

30/07/2014

Mr Jon Black  
Director-General  
Department of Environment and Heritage Protection  
GPO Box 2454  
Brisbane QLD 4001

Via email: [Epact.Policy@ehp.qld.gov.au](mailto:Epact.Policy@ehp.qld.gov.au)

Dear Jon,

The Chamber of Commerce and Industry Queensland (CCIQ) writes to you to express our support for the proposed *Environmental Protection and Other Legislation Amendment Bill 2014* (the Bill) amending sections of the *Environmental Protection Act 1994* and the *Waste Reduction and Recycling Act 2011*.

CCIQ notes that in particular, the Bill aims to improve the efficiency of technical assessment for contaminated land matters through private sector providers and the improvement of the EIS process creating efficiencies, transparency, certainty of process and speeding up of time frames.

Additionally, the Bill amends Chapter 8 of the *Waste Reduction and Recycling Act 2011* for the improved recovery of waste materials under the Beneficial Use Approval (BUA) framework.

The Bill will replace general BUA's with 'end of waste codes' which will provide clarity around when a waste ceases to be recognised as a resource. Improving this process will create further incentives for market opportunities to be realised through the uptake of more applications for end of waste codes.

CCIQ is supportive of initiatives that encourage the development of market opportunities whilst championing waste management. The Queensland business community are strongly committed to balancing environmental sustainability with economic prosperity and recognise their role in minimising the impact of their activities on the environment.

CCIQ believe these reforms adequately reflect the intentions of the industry-led waste strategy which was developed as part of the government's election commitment. These reforms will achieve the waste strategy's key objectives in:

- Adding value to waste;
- Managing more wastes as resources;
- Promoting regional opportunities for managing wastes locally;
- Further developing the secondary materials reuse in Queensland; and

- Retaining the value of material in the economy for as long as possible.

CCIQ highlights for your consideration the potential for a DEHP service that can facilitate linking businesses to accessing opportunities to reuse secondary materials.

CCIQ notes the increase in penalties and highlights that for those who deliberately and knowingly break the law, penalties act as a key deterrent and enforcement measure. CCIQ acknowledges the recent emphasis on education and awareness strategies and believes this is generally a more constructive methodology as is a pragmatic approach when determining accountability.

CCIQ wishes to express our appreciation for the opportunity to consult with the Department on the 8<sup>th</sup> July 2014 in relation to the Bill's implications for Queensland small business operators.

CCIQ looks forward to working with the Department in achieving the goals of the review. Should you have any questions regarding this letter please do not hesitate to contact me on 07 3842 2279.

Yours sincerely,



**Nick Behrens**  
General Manager of Advocacy