

Thursday, 31 March 2011

The Commissioner

Queensland Flood Commission of Enquiry

P.O. Box 1738

Brisbane QLD 4001

Attention: The Honourable Justice Catherine Holmes

Dear Justice Holmes,

Thank you for providing us the opportunity of making a submission to this important flood and natural disaster event open enquiry.

The Waste Contractors and Recyclers Association of Queensland (Inc) WCRAQ, is Queensland's peak industry association. Our members operate in every sector of the waste and recycling industry. Membership includes international and national corporate group companies as well as many family based operators. The member's operations are state wide.

WCRAQ provides to the commission its response on a number of key observations we have identified as being pivotal industry lessons from the flood and other weather events. Our response is focussed on the cleanup and recovery, removal, and disposal, community and business operations as these relate to solid, liquid, hazardous and regulated wastes.

Background

Waste generation and its removal for treatment and disposal, is a 7 day a week operation. WCRAQ has advocated to government for many years that the collection, transport and disposal of all solid, liquid and hazardous waste materials, must be recognized as an *essential community service*. Its efficient removal from all sources of generation underpins the basic principles for maintaining a healthy, vibrant community and safe living environment.

WCRAQ members understand very clearly the impacts that extreme weather events have on their operations, and it is for this reason all have emergency operational management plans in situ, to ensure when major weather events do occur, the collection and removal of waste in the community in some form or another can be undertaken.

Local government has traditionally had the responsibility for cleaning up and removing wastes

following major weather events. It is well placed for this. Typically an affected local authority engages private sector contractors to assist in the work.

What became very clear and was proven as fact from the recent flood events is that whilst local government authorities may have disaster cleanup management plans in place, these typically only focuses on households, street debris, parks, green waste or creek debris.

Cleanup plans conducted by local authorities after the recent flood event were observed to be done remarkably efficiently at a domestic household / street level, but what actually occurred on the ground was a significant failure of focus by any level of government to look at the clean up scale at the macro level.

The result being that in the overall approach to managing the problem , all clean up plans failed to include any detailed, critical approach or analysis for the handling, removing, managing or disposing of the very significant quantities of commercial and industrial waste types that are generated when these events occur and impact industry. Waste streams that had to be managed included significant quantities of hazardous, regulated, liquid and organic waste streams, generated as result of the industrial and business community impacted.

Observations

WCRAQ has advocated for many years of the need for the State Government to have a master crisis management plan for managing wastes generated, and for its removal in the event of a major bio security incident, oil spill disaster or similar natural disaster event occurring.

Despite repeated attempts by the association to engage various state agencies, DEEDI, DERM, and other departments in the discussion, and after having numerous meetings with these government agencies, all attempts have failed as the departments have been incapable of making a decision and committing with industry such a master document.

The flood events of this summer yet again prove the critical need for such a plan to be committed to by government in order that it protect the community from environmental and health impacts of these disasters.

The WCRAQ members are committed to working with Government to ensure we get a definitive and more efficient and collaborative approach to managing waste as result of impacts from such events. It has the capacity, capability and understanding for delivering such a master plan.

The WCRAQ's critical observations to note are:

- Waste and Recycling industry companies and operators were not engaged in any of the pre-planning processes nor had any understanding of Council needs or that of any level of Government for the removal and cleanup process that had to be conducted following the

floods. This resulted in a very chaotic situation arising where industry assets could not be deployed effectively initially, and at one point the cleanup process nearly became paralyzed, as waste couldn't be moved in or out of delivery and receipt points. Industry assets were called upon at very late notice and as the sector was balancing normal business waste and removal operations from unaffected areas, against a hugely different logistics issue, with unknown needs, it resulted in a very fine balancing act, to maintain and achieve what was ultimately seen as a good result.

➤ Private sector landfill and waste transfer operations were urgently asked to operate outside normal operating hours and outside of planning and environment approvals to take flood related clean up wastes. This left company directors of the companies at the time exposed to breaches of license conditions.

➤ Some government regulators have since become difficult to deal with following the event as they grapple with issues that some facilities may now have different operating and fill levels, resulted as taking in many tens of thousands of tonnes of additional wastes quickly.

➤ The lack of planning for temporary storage, locating and bulk out of flood clean up wastes resulted in parks, car parks, streets and road reserves being used to deposit household and street waste. This resulted in significant operational, land contamination, leachate run off, and at times safety issues. It may have been seen as a coordinated response understood by Council's but industry operators had little or no understanding of asset needs, which in turn saw very confusing events arise and of who was doing what and who was responsible.

➤ Commercial and industrial business owners across the flood affected areas were largely left unassisted in the cleanup process initially as insurance companies stepped aside of responsibility. This resulted in a total breakdown of communication to determine who was going to pay for the removal of waste, what waste could go where, and of a total lack of prioritizing of facility clean ups. Fortunately both Brisbane and Ipswich City Councils had the foresight to take responsibility for this but the uncertainty caused significant delays. This then cascaded to potential hazardous incidents occurring as food and organic wastes went sour, sometimes in hundreds and in several cases thousands of tonnes being affected.

➤ It was evident that no central register is held by either Council's or any state government agency ie DERM or DEEDI, that lists and identifies critical business and industry facilities that could become potential environmental or bio hazard sites in the event of a natural disasters occurring, ie poultry farms, food processing operations, abattoirs, meat and freezer stores, cold rooms, organic material stores, paint, regulated and hazardous waste storage locations.

➤ Freezer and cool rooms and other business facilities could not be accessed to get pallets of product out as forklifts could not be sourced across the city. This then resulted in both solid and liquids including dairy foods going off, and waste operators staff then having to work in very difficult situations and some operators having to use breathing apparatus to remove industry generated waste. This resulted in several bio hazard incidents occurring as result of rotting meat, and a lack of priority for deploying limited industry assets to clean these up as a priority.

➤ The need for liquid waste and of sludge removal equipment was not focused on until after the event, and then industry assets became incapable of meeting demand. No priority management plan was set in place to get industry assets deployed to critical infrastructure first. This resulted in industry assets being deployed to operations of lesser importance operations, ie first in first served, not by critical need.

➤ Hazardous waste removal and regulated waste management grew into a large issue as the clean up took place. WCRAQ members co-ordinated this direct with Councils but it was a very critical oversight at the beginning of the exercise.

➤ Household hazardous waste and the management of this became a significant issue in some areas. It resulted in very urgent requests to remove and dispose, for example, cyanide containers and one incident to manage the safe removal of a 120 kilogram container of aluminium powder. This was capable of causing a significant explosion if it got wet.

➤ Asbestos removal in waste became an issue as householders cleared houses.

➤ Little thought was given by the community to attempt to recover household affected items that could have just been washed with water and reused. This impacted significantly the quantity and volume of waste managed and it was very disturbing to note how no thought was given to recover many simple personal home affects, ie push bikes, tools, swings and toys.

➤ Recycling and recovery of metals could have significantly reduced costs of disposal if more planning and thought was taken to temporally locate, store and then sort the waste rather than just send it all to landfill for disposal at the pace it was done.

Issues for the commission's consideration

It is absolutely critical that a master crisis waste and recycling management plan be developed with all key stakeholders to ensure the issues and observations that did occur as result of the floods in 2011 are not repeated.

Council plans must also be overhauled to address a more macro waste cleanup and waste type response.

The central emergency management centre should have overarching responsibility of ensuring the master cleanup plan is enacted and all responsibilities are clearly understood.

WCRAQ advocates that any developed waste management cleanup plan should also cover not only natural disaster events, but also include bio security incidents, as well as manmade disasters, ie oil spills or chemical spills.

The management of business wastes from commercial and industrial sectors, food processing operations, abattoirs, and regulated, hazardous and liquid wastes must be factored into such a future plan. The plan after it is adopted should be reviewed and discussed with all stakeholders at least once a year to ensure it remains active and vibrant and stay's aligned to Queensland's growth and business activity.

In the case of household's it would really assist future clean up from extreme weather events that prior to each summer period, government conducts a household hazardous and regulated waste cleanup event and households are encouraged to remove these wastes well ahead of summer events. Such an event should also be made available to small business in some form.

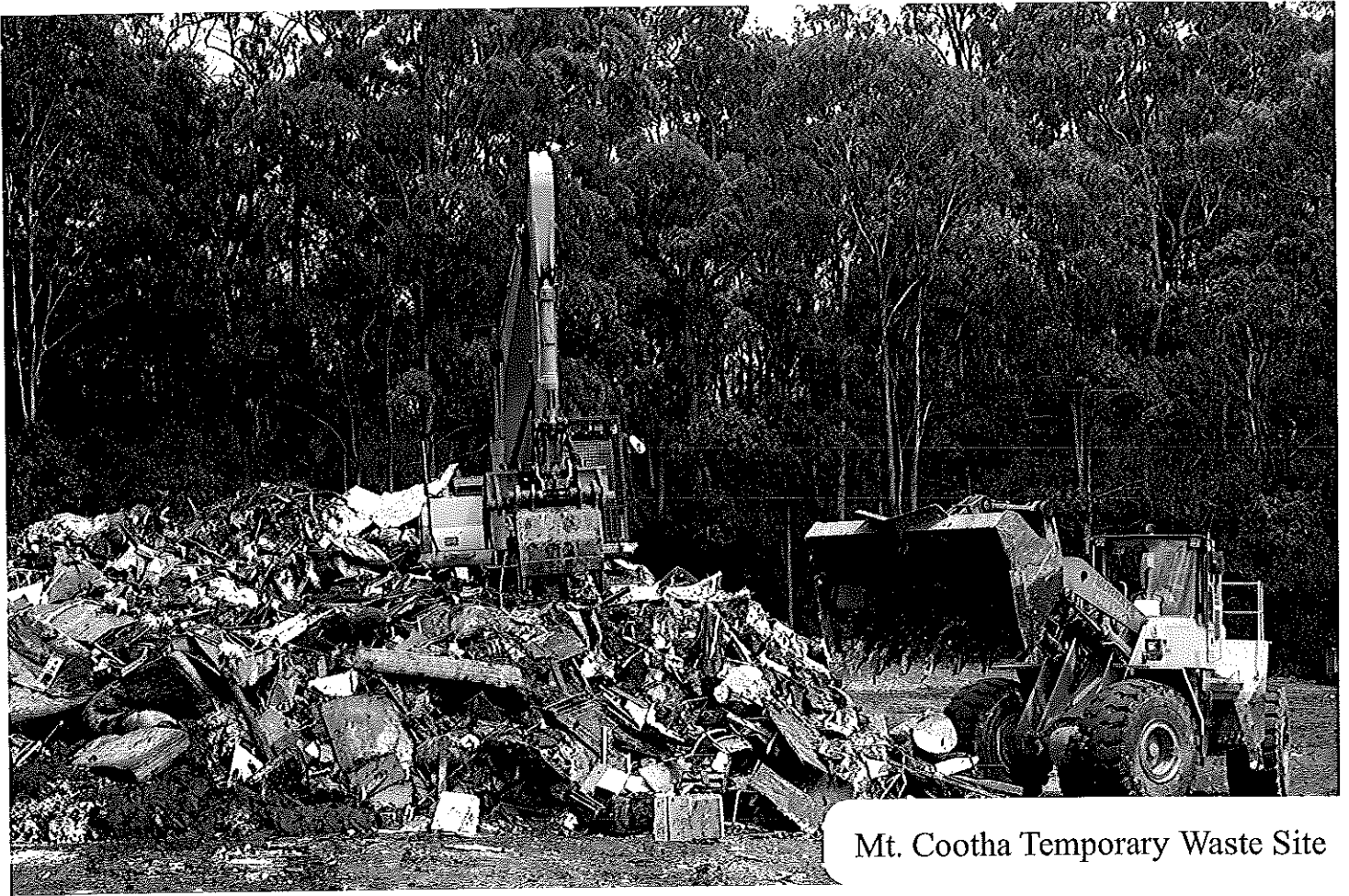
We have attached a number of pictures as reference and for information to assist the commission in viewing what was largely a hidden and unreported issue.

The Association trust our observations and issues reported will assist the commission with its deliberations and if we can assist with any further information please do not hesitate to contact us.

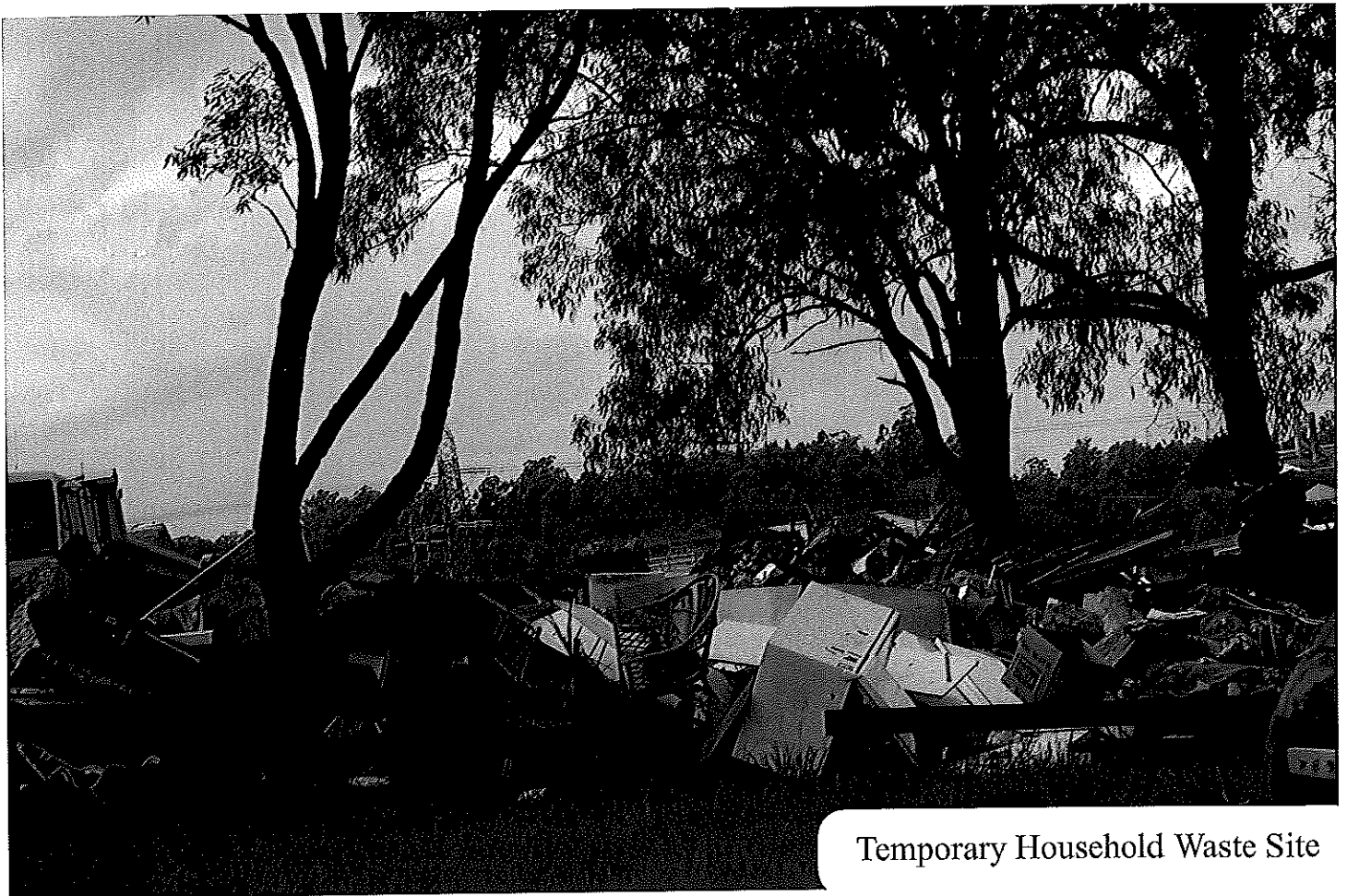
Yours Sincerely,



~~Rick Ralph~~
Executive Director
Waste Contractors and Recyclers Association of Queensland (inc)



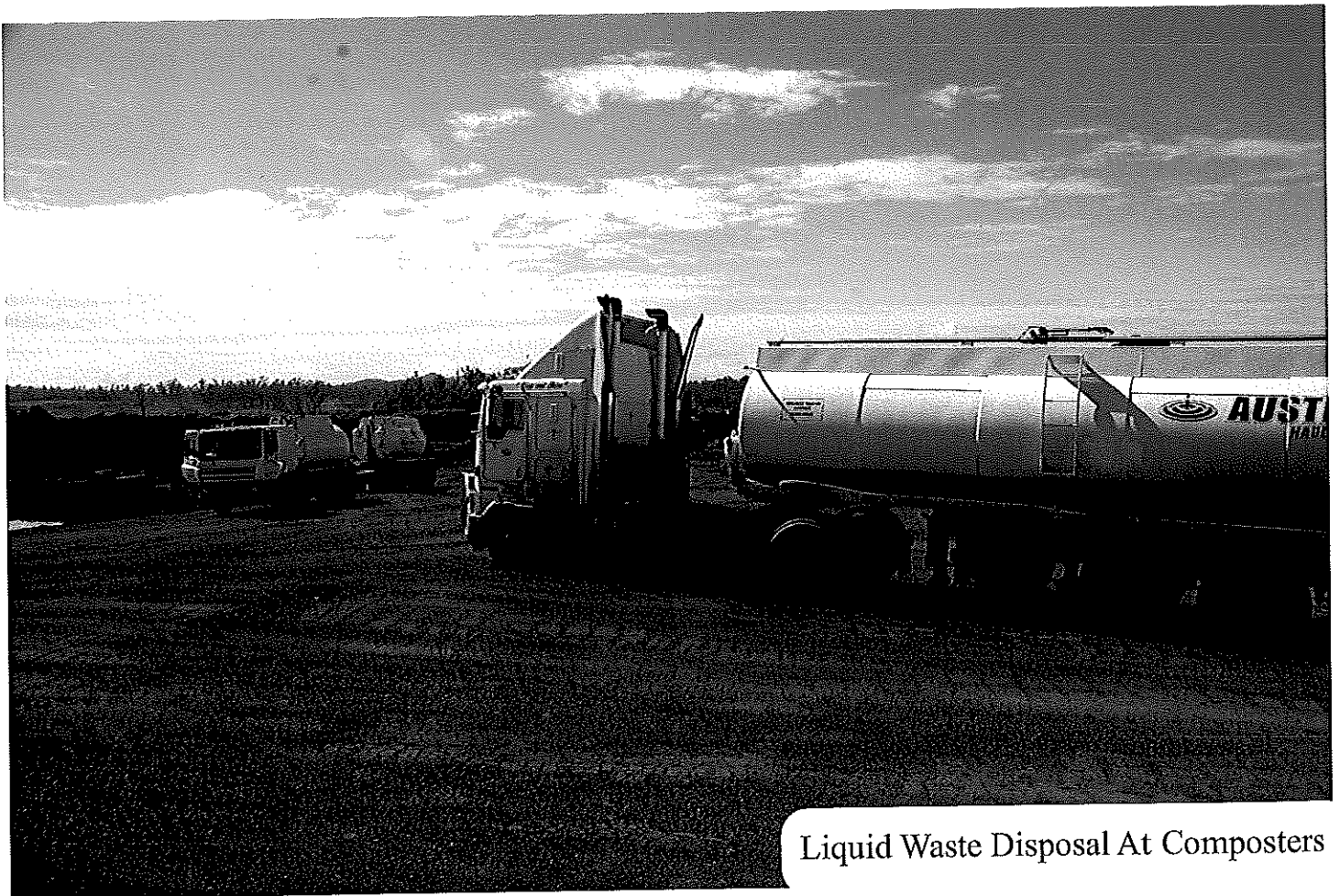
Mt. Cootha Temporary Waste Site



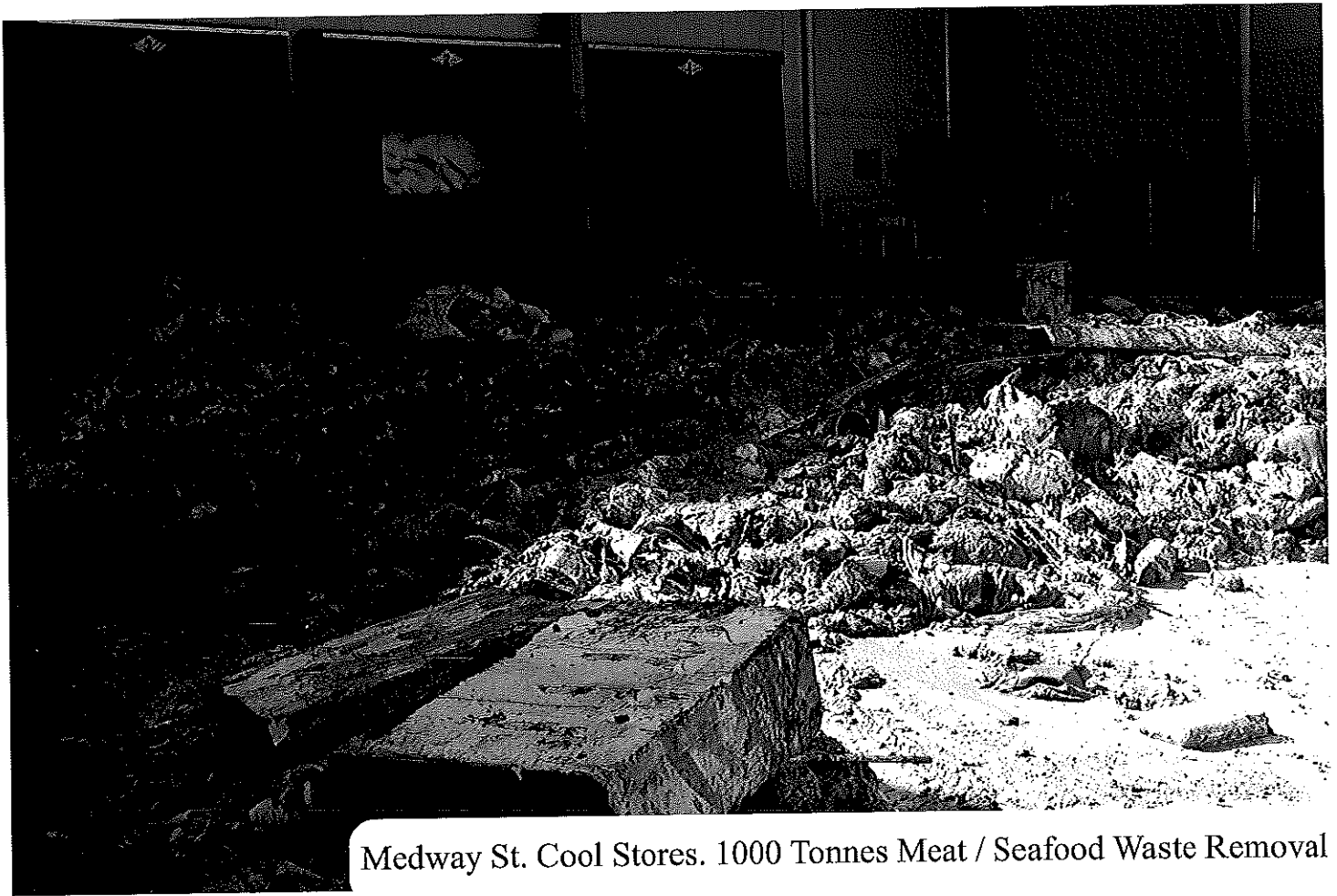
Temporary Household Waste Site



Archerfield Rd. Waste Site - Metal Recovery



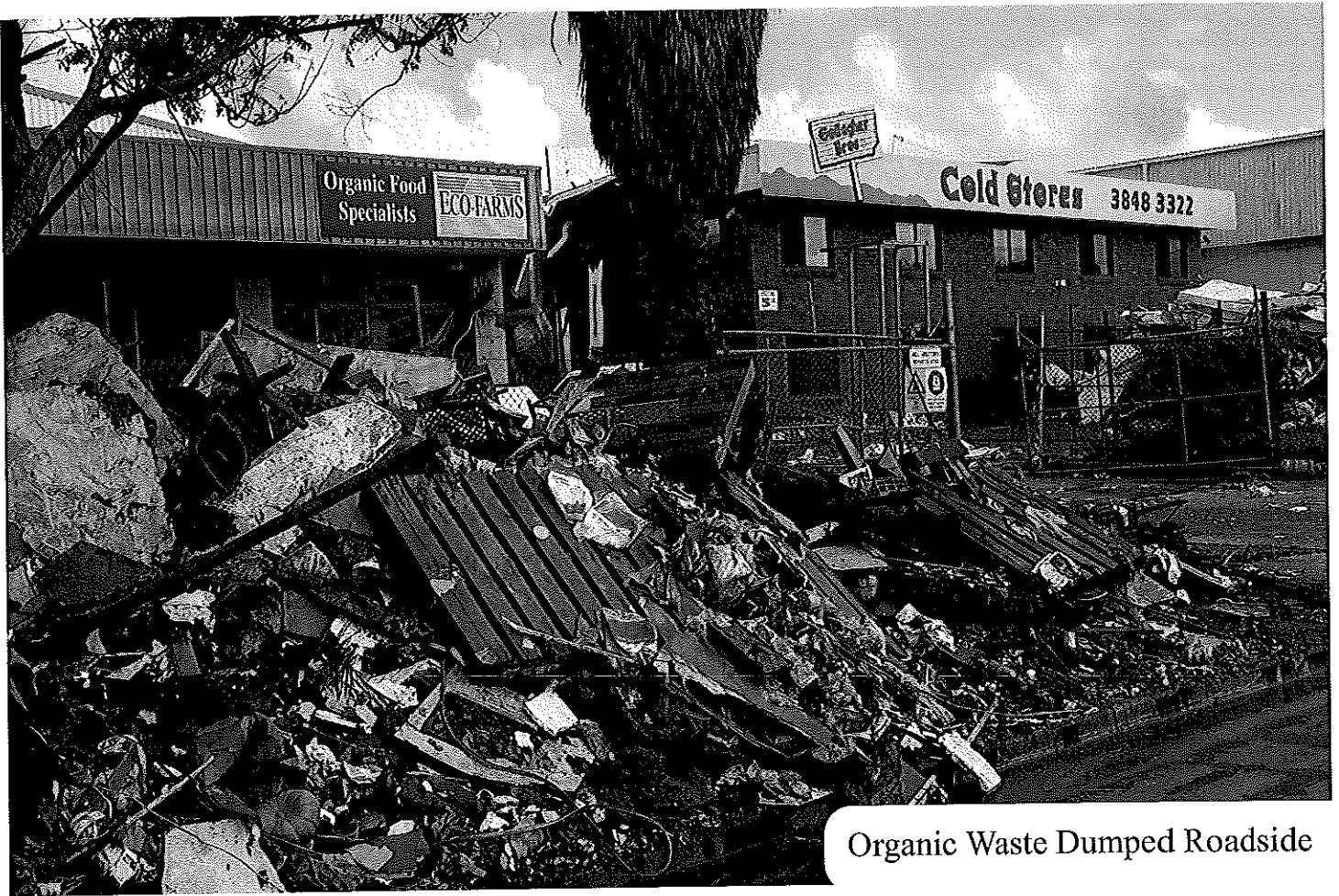
Liquid Waste Disposal At Composters



Medway St. Cool Stores. 1000 Tonnes Meat / Seafood Waste Removal



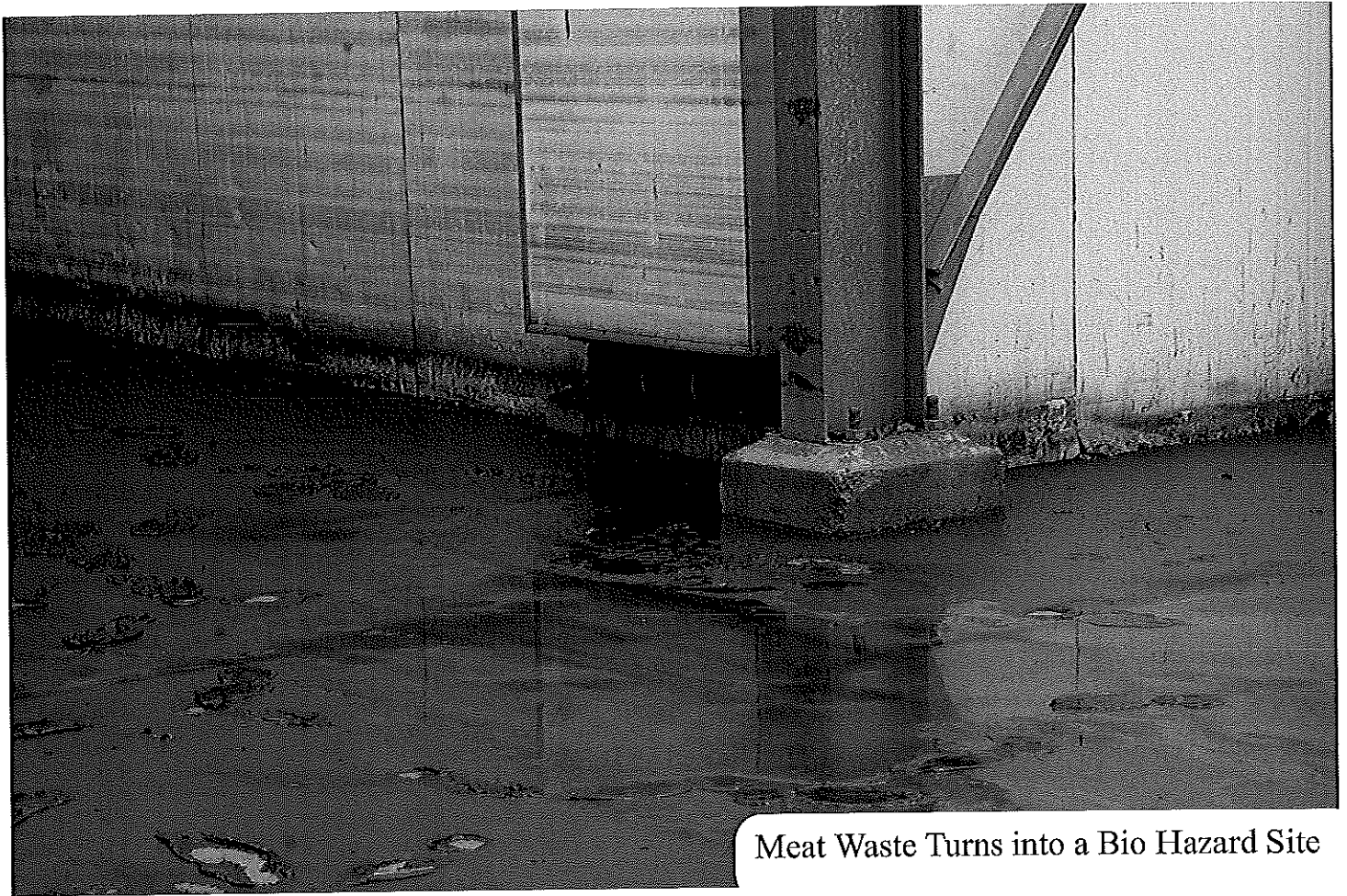
Internal Freezer Work



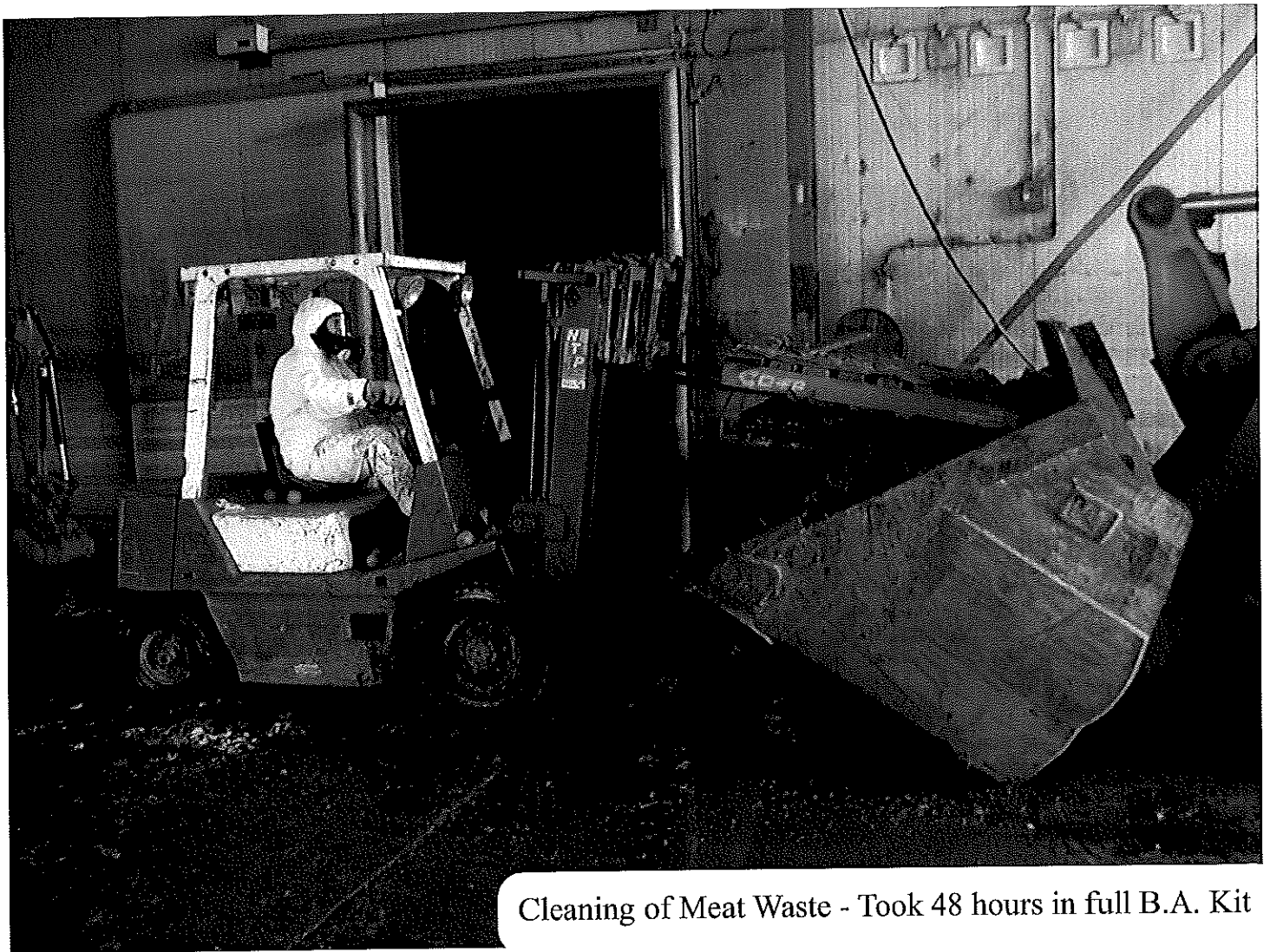
Organic Waste Dumped Roadside



Seafood - After flood



Meat Waste Turns into a Bio Hazard Site



Cleaning of Meat Waste - Took 48 hours in full B.A. Kit