13 July 2026

Angela Moody
Chair
Queensland Productivity Commission
Level 17, 69 Ann Street
Brisbane QLD 4000
via: [Submissions portal]

Submission: Inquiry into the impacts of the Australian Government's 2025 Environment Protection Reforms on Queensland

Dear Ms Moody,

The Waste Recycling Industry Association Queensland (WRIQ) welcomes the opportunity to provide feedback to the Queensland Productivity Commission's Inquiry into the impacts of the Australian Government's 2025 Environment Protection Reforms. WRIQ represents more than 100 waste and recycling businesses collectively managing 97 per cent of Queensland's waste collections as well as owning and operating more than $3.8 billion in essential waste and recycling infrastructure across the state. Our industry contributes around $2.7 billion to Queensland's economy each year and employs approximately 16,000 Queenslanders.

Queensland's waste and recycling industry supports strong environmental protection. Our members work within environmental regulation every day and understand its importance. The issue raised in this submission is not whether environmental regulation is needed. It is whether the Commonwealth's 2025 reforms will improve environmental outcomes without unnecessarily increasing costs, delaying investment and making Queensland businesses less productive.

Waste and recycling is already one of Australia's most highly regulated industries. Queensland businesses understand the need for strong environmental standards. The concern is not regulation itself. It is unnecessary duplication that increases cost without improving environmental protection. Our members are increasingly required to navigate multiple layers of Commonwealth, State and local government regulation to develop, expand and operate waste and recycling facilities. Every extra approval means more consultants, more legal advice, more delay and less money available to invest in better recycling facilities.

Essential for community Essential for environment

The Queensland Productivity Commission has been asked to consider how the Commonwealth reforms will affect Queensland. The greatest risk is that additional Commonwealth regulation will make it harder for Queensland businesses to invest, recycle more material and deliver the environmental outcomes governments are seeking.

Businesses are facing more cost and uncertainty

Waste and recycling businesses make long-term investments. Every new recycling facility, landfill or processing plant requires confidence that governments are working towards the same outcome. However our members consistently tell us that Commonwealth environmental regulation is becoming more difficult to navigate, adding cost, time and uncertainty. Businesses are now expected to navigate Commonwealth, State and local government approvals for the same project. Each additional process adds time, cost and uncertainty, but doesn't always improve environmental protection.

Our members questioned whether additional Commonwealth processes are delivering better environmental protection, or simply duplicating existing State requirements. Several concerns were consistently raised during consultation, including:

- duplication between Commonwealth, State and local government approval processes.
- increasing approval timeframes that delay investment decisions.
- additional reporting and compliance requirements that add cost without improving environmental outcomes.
- limited engagement with operators before new requirements are introduced.
- uncertainty that makes it more difficult for businesses to commit capital to long-term projects.

Regulation should support investment in recycling, not slow it down

The Commonwealth reforms should make it easier for businesses to recycle more material, invest in better facilities and respond to emerging environmental challenges. Instead, our members identified several examples where Commonwealth policy has increased complexity or shifted costs onto industry without delivering practical improvements. One of the strongest concerns was the continued lack of progress on product stewardship. After years of discussion, businesses are still waiting for stewardship schemes to deliver the markets and funding they were promised. In the meantime, industry continues to carry the operational and financial burden.

The Commonwealth asked industry to build domestic recycling markets. It then introduced export restrictions before those markets existed. Businesses were left carrying the commercial risk while government policy caught up. Operators also described the practical difficulties faced by facilities near the Queensland–New South Wales border, where differences in container refund arrangements can prevent recyclable material from being commercially recovered. Stewardship schemes should encourage recycling—not make it harder because material crosses a state border.

Businesses are also dealing with growing Commonwealth reporting obligations, including climate reporting and emerging PFAS requirements. These issues are important, but new reporting should improve environmental outcomes, not duplicate work businesses are already doing.

These examples point to a broader issue. Good environmental regulation should make it easier for businesses to recycle more material and invest in better environmental outcomes. When regulation increases cost and complexity without delivering a measurable environmental benefit, it reduces productivity without achieving its intended purpose.

Good regulation starts with industry

Government shouldn't first meet waste operators after the rules have already been written. Waste and recycling businesses work with environmental regulation every day. They understand what works in practice, where unintended consequences occur and how new requirements affect investment and operations.

Too often, Commonwealth policy makers and regulators develop new requirements without first understanding how waste and recycling facilities operate in practice. Consulting businesses after the rules have already been drafted leaves little opportunity to improve the final outcome. The best regulation is developed with the people responsible for making it work.

Recommendations

WRIQ recommends the Queensland Productivity Commission consider the following recommendations in developing its final report to the Queensland Government.

1. **Reduce duplication between Commonwealth and State environmental approvals** to minimise unnecessary cost, delay and regulatory burden for Queensland businesses.
2. **Only introduce new Commonwealth environmental requirements** where they deliver a clear environmental benefit.
3. **Recognise existing State regulatory processes wherever possible**, rather than creating parallel approval pathways for the same activities.
4. **Reform product stewardship schemes** so they support practical recycling outcomes, create stronger domestic markets and reduce unnecessary costs for industry.
5. **Don't introduce new regulation** before the supporting markets, funding or infrastructure exist.

6. **Engage waste and recycling businesses earlier in policy development**, before key regulatory decisions have been made.
7. **Increase direct engagement between Commonwealth regulators and industry**, including regular visits to operating waste and recycling facilities to better understand how businesses operate in practice.
8. **Continue working with industry during implementation**, not just during formal consultation periods, to identify unintended consequences and improve regulatory outcomes.

The Queensland Productivity Commission has an opportunity to highlight where Commonwealth regulation is unnecessarily reducing productivity for Queensland businesses and recommend practical reforms that support both environmental protection and economic growth. Queensland's waste and recycling industry isn't asking for lower standards. It's asking for smarter regulation. Businesses are ready to invest, recycle more material and deliver better environmental outcomes. Government should be removing barriers to that investment—not creating new ones.

Yours sincerely,

[redacted]

Alison Price
Chief Executive Officer

Waste, Recycling Industry Association (Qld) ABN 50 986 260 101
A Level 5, 14 Banfield Street, Chermside QLD 4032
E memberservices@wriq.com.au
wriq.com.au