

19 June 2025

Department of the Environment,
Tourism, Science and Innovation

Dear Sir/Madam,

Queensland Waste Strategy 2025-2030

Master Builders is the peak industry body for building and construction in Queensland and represents the interests of 10,000 building and construction related members. Our membership spans the full spectrum of the industry – from residential and commercial builders to subcontractors, manufacturers, and consultants.

Master Builders supports the government's intent in the draft waste strategy to reducing, reusing and recycling valuable materials as much as possible. In particular we support the goal to implement "practical measures to boost recycling and reduce impact on the environment without adding additional costs".

Master Builders supports a circular economy in its [Sustainability Goals](#). More sustainable building practices and a commitment to achieve a net-zero built environment is part of our goal to reduce the environmental impact of the built environment. As part of the action plan under the Goals, Master Builders is working through partnerships covering product assurance, traceability and net zero innovation with the aim of developing better tools for the safe use of products, essential for increasing the use of recycled materials in construction.

The experience of Master Builders members has been that the Waste Levy has not been effective in introducing a change in practices to result in a meaningful reduction of waste from construction sites. More support is needed for the recycling and reuse of construction waste if the government is to achieve the goals of this strategy.

We have provided a detailed response, covering each of the specific questions in the consultation, in the attached.

Thank you for the opportunity to contribute to this important consultation. If you require any further detail or clarification, I can be contacted at *email redacted* or Tel: *number redacted*.

Regards,

Michael Hopkins
Executive Manager – Advocacy and Member Services

ATTACHMENT

1. Are there any changes needed to the draft new Queensland Waste Strategy to reflect the challenges in meeting some targets?

In setting the vision for waste reduction and recycling the Queensland Waste Strategy as drafted achieves its objectives. Importantly, it recognises the essential role of working in partnership with industry, local governments, and the wider community.

However, it's in the follow-up action plans—outlined in the draft—where the real strategy will take shape. For the construction sector, it's critical that the Built Environment action plan reflects the specific challenges the industry faces, especially when it comes to waste separation, sorting, and on-site storage. Many construction sites operate within tight spatial and logistical constraints, making it difficult to meet high recovery and recycling targets. The action plan should set out realistic, staged targets, and include support to help businesses adopt to new waste management strategies.

It's vital that these measures do not increase construction costs—specifically the cost of delivering new housing in Queensland. It is being reported that the current waste levy already regularly adds \$3,500 to the cost of a new home.

2. Are there other data or metrics that need to be collected to effectively measure progress against the Queensland Waste Strategy targets?

Better data will support benchmarking and highlight areas where the strategy and action plan can target investment and policy reform to improve performance. Better data will also help the industry to strategically direct its own investments.

With the stated goal of the strategy to support the circular economy and increasing innovation data and metrics should clearly indicate where progress has been achieved—and where further effort is required.

To support this ambition, more granular data collection should begin with:

- construction and demolition (C&D) waste types and volumes by region and project scale
- rates of reuse, recycling, and recovery specific to the construction industry
- availability and market uptake of recycled C&D materials.

3. Are there other priority products or materials that should be included in the priority products and materials list?

Priority products for the construction industry include:

- Aluminium and steel – high volume and high value proposition for recycling
- Concrete – opportunity to tackle a bulky and high carbon material
- Plasterboard – high volume and problematic in landfill
- Insulation and composite materials – growing in use but difficult to recycle
- Ceramics and tiles – heavy, inert materials with limited recycling options.

4. Do you support continuing to develop action plans that support the draft new Queensland Waste Strategy?

Yes, action plans are essential for translating policy into practical outcomes. They provide a clear and structured pathway to achieving the strategy's goals and are the right tool to explore the full range of opportunities for progress. This helps prioritise actions that deliver the greatest impact for the lowest cost.

Action plans also offer a way to address the specific challenges and opportunities unique to the construction industry, ensuring that strategies are relevant and workable in the context of delivering new construction.

However, for the action plans to succeed, they must be co-developed with industry stakeholders to ensure they are both practical and cost-effective.

5. What are the barriers to establishing technologies to process problematic waste streams?

The construction industry operates in a fast-paced, high-risk environment with tight margins, making it particularly challenging to implement change. Project delivery is often fragmented across multiple independent contractors and stakeholders, further complicating the adoption of new or innovative approaches. The sector's high level of regulation adds another layer of complexity, often acting as a barrier to investment in alternative practices.

In Queensland, the decentralised and geographically dispersed nature of construction activity adds another hurdle. Long distances and high transport costs can make recycling solutions economically unviable, particularly in regional or remote areas.

One of the unique challenges for construction is the requirement for recycled products to demonstrate full compliance with the National Construction Code. This typically demands traceability throughout the supply chain, which is currently limited or inconsistent across most stages of construction. In response to this challenge, industry has worked collaboratively to towards improving digital traceability along the supply chain. This work is reflected in the National Building Products Coalition's guide to [Traceability and Digitalisation of Building Product Information](#).

To help overcome these barriers, a mix of targeted support measures is needed. These could include:

- targeted grants to support innovation and recycling infrastructure
- regulatory clarity around the use of recycled materials and compliance pathways
- government leadership to improve digital traceability of construction products
- demand-pull mechanisms, such as minimum recycled content requirements in government procurement and public infrastructure projects.

6. What national reforms or harmonisation measures do you support, or not support, in terms of the benefits or costs to Queensland businesses, councils or Queensland more broadly?

The Queensland strategy needs to align should work with the steps being taken nationally towards a circular economy and specifically the [National Framework for Recycled Content Traceability](#).

7. Are the settings for the Queensland waste levy appropriate?

Taxes and fees such as the waste levy inevitably add to the cost of housing. While the strategy aims to avoid direct impacts on households, indirect costs—such as those passed through construction—are harder to avoid. It is being reported that the levy regularly adds \$3,500 to the cost of a new home.

One challenge is the cost and practicality of on-site waste separation, particularly on space-constrained sites such as high-density urban projects or residential house lots. These sites often lack the capacity for multiple bins or on-site sorting facilities.

Another significant barrier is Queensland's limited recycling and resource recovery capacity, which places a disproportionate burden on smaller and regional construction projects. This presents a clear opportunity to invest levy revenue into building this capacity, making it easier and more economical for construction businesses to manage waste sustainably.

To address these challenges, the waste levy setting should be amended to:

- targeted exemptions or rebates for construction businesses that invest in on-site recycling or use recycled materials
- increased support for recycling infrastructure, with a particular focus on regional areas.

8. How can Queensland reduce the impacts of waste levy settings in New South Wales on interstate waste transfer?

Improving opportunities for recycling will also help to reduce the demand for waste transfer across the border. Stronger enforcement and tracking of waste movement will also help to crack down on interstate waste.

9. Are there any wastes missing from the list of wastes that are excluded, exempt, and discounted from the waste levy?

Materials containing crystalline silica (such as engineered stone) are regulated materials and like asbestos need to be disposed of safely. Therefore like asbestos, therefore they should be exempt from the levy.

10. What should waste levy funds be re-invested into?

Innovation and the circular economy are the focus of the strategy and yet currently receive a small proportion of investment from the fund. This is an area of opportunity.

The waste levy funds should be redirected to achieving the goals of the strategy, specifically:

- recycling infrastructure tailored to C&D waste.
- recycling processing technologies for regional sites.
- market development for recycled materials through procurement mandates and innovation grants.

11. Are there any other administrative issues with the waste levy that need to be addressed?

All administrative processes add time and cost and take away from the central role of delivering more housing.