

30 June 2025

Waste Policy and Legislation
Office of Circular Economy
Department of the Environment, Tourism, Science and Innovation

Via email: oce.policy@detsi.qld.gov.au

Dear Waste Policy and Legislation team

Re: Draft Queensland Waste Strategy 2025–2030

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide feedback on the draft Queensland Waste Strategy 2025–2030 (the Strategy). We commend the Queensland Government on its goals to move towards zero-waste, stimulate economic growth, support jobs and reduce costs of living with the development of this Strategy.

GBCA provides the following key points in relation to the Strategy:

- A new Waste Strategy is an important opportunity to prioritise circular outcomes - While the Strategy includes mentions of circularity, it focuses objectives and actions for recycling and waste management rather than addressing the root causes of waste generation.
- Government leadership is critical to driving progress on circularity at scale – Establishing circular criteria within state public procurement policies is vital to supporting circular materials management and construction techniques, creating demand across supply chains and encouraging innovation.
- Investment in circularity is vital – The Queensland Government has central role to play in reducing waste, emissions and costs while creating opportunities for Queensland businesses to develop innovative, circular products and practices that will be in demand domestically and internationally.
- Establishing appropriate targets and metrics to measure and encourage circularity will be critical for government and industry progress towards a circular economy – Measuring progress against landfill diversion and recycling rates will not be enough to get us there.
- GBCA strongly supports the inclusion of the built environment as a high priority for development of an action plan – Construction and demolition waste alone accounts for 39% of Australia's total waste generation. Many opportunities exist to deliver circular outcomes, innovation and economic gains in a more circular built environment.

GBCA provides additional information and comments in response to the consultation questions in the submission attached. We welcome the opportunity to work with Queensland Government's Office of Circular Economy to discuss ways in which we can support action in relation to the points and in the submission.

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings – including social infrastructure – fitouts and communities. Green Star aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities
- contributing to market transformation and a sustainable economy.

To arrange further discussion, for a briefing on our work to date regarding ..., or for additional clarification of the points made above, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at katy.dean@gbca.org.au.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'D. Rooney', with a stylized flourish at the end.

Davina Rooney
Chief Executive
Green Building Council of Australia

Draft Queensland Waste Strategy 2025–2030 consultation

GBCA provides comment on the following questions for consultation:

How can we encourage reducing and reusing materials, and where do you think more investment is required?

While the draft Queensland Waste Strategy 2025–2030 (the Strategy) makes welcome commitments to reducing waste and improving recycling, it retains a strong emphasis on recycling and waste management rather than addressing the root causes of waste generation. Recycling is an important component of resource recovery, but it is only one part of a circular economy. Greater focus is needed on strategies that prioritise waste avoidance, such as designing for longevity and disassembly, prioritising repair and reuse, and product stewardship. These strategies focus on retaining the highest value of materials in circulation for as long as possible, rather than devaluing materials in the linear, take-make-waste model in which our economy currently operates. Developing, implementing and strengthening upstream measures like these will help Queensland move beyond managing waste to genuinely designing waste out of the system. Waste is also costing Queenslanders and Queensland businesses dearly. GBCA, in partnership with Coreo, the Clean Energy Finance Corporation (CEFC) and NSW Government, has just released the report, [Australia's waste\[d\] opportunity](#). Calculations in the report show that the construction of a new, average-sized (137m²) apartment in Brisbane has material costs of around \$1740 per m², while on average, we are wasting around 22% of materials. That's around 142kg of waste, and around \$384 spent on wasted materials per square metre. If we consider the Queensland Government's target of 247,000 new homes by 2029 under the National Housing Accord, there are clearly huge savings to be made if we focus on ways to reduce waste, rather than only relying on recycling.

Government leadership

There are already examples of Australian organisations adopting or developing circularity initiatives. These are not only reducing waste and saving costs but also delivering additional value to the economy. However, government leadership through policy and procurement is essential to drive change at scale.

Developing a waste strategy with a strong circularity focus is a critical step. While metrics such as targets for construction and demolition landfill diversion rates are influencing some positive changes, diversion rates don't tell us how much material and value is lost along the way even when we do recycle (for example, some recovery rates are as low as 14%¹). We must develop and adopt material circularity metrics and targets for recovery channels.

Establishing circular criteria within state public procurement policies is also vital to supporting circular materials management and construction techniques, creating demand across supply chains and encouraging innovation.

A useful resource for government is GBCA's [A practical guide to circular procurement for new buildings and major refurbishments](#), developed with support from the Queensland Government, NSW Government, Government of South Australia and CEFC.

Government investment

The world is demanding circular, low-carbon building materials and a growing, decarbonising economy needs an innovative and competitive supply chain. Investment by the Queensland Government to create a more circular economy will cut waste, reduce emissions and create opportunities for Queensland

¹ <https://www.dcceew.gov.au/sites/default/files/documents/apff-national-report-2020-21.pdf>

businesses to develop innovative, circular products and practices that will be in demand both domestically and internationally.

Recommendations from [Australia's waste\[d\] opportunity](#) report include:

- Introduce financial incentives such as rebates or subsidies for projects that achieve a high level of material recovery and secondary material reuse, rather than just reporting high diversion rates.
- Create dedicated grants for projects that focus on reuse or refurbishment of existing structures.
- Utilise landfill levies to not only discourage landfilling of unused materials, but to reward projects for diverting resources into secondary markets. Offer rebates to recyclers recovering over 90%, with the unrecoverable 10% receiving a full levy rebate if landfilled.

Examples of other areas for investment include:

- Understand and map the opportunities – GBCA led a project on behalf of the South Australian Government to produce [Circular economy in South Australia's built environment: Action plan](#). This report identifies opportunities for government and industry investment and action.
- Sector investment – In NSW, the [NSW Net Zero Manufacturing Initiative](#) supports NSW businesses and industries to lead in the net zero transition by increasing their competitiveness, attracting investment and opening new growth opportunities. From the total \$275 million in grant funding available, \$100 million is allocated to the Low Carbon Product Manufacturing Program to expand and increase local manufacturing capacity for low carbon products and materials.
- Building capacity in the supply chain – Based on recommendations within the Australian Sustainable Built Environment Council's report, [Our upfront opportunity](#), is the opportunity to support Queensland-based circular and/or low-carbon product and materials manufacturers to develop Environmental Product Declarations (EPDs). EPDs are a critical tool in understanding the provenance of products and materials and encouraging EPD uptake will have widespread positive impacts for waste and the environment. However, EPDs can be expensive, time consuming and challenging for small businesses to attain. Investing in innovative Queensland businesses and supporting them to attain EPDs could deliver a range of outcomes, such as:
 - Growing the capacity of the local supply chain to support more sustainable projects – from homes and buildings to major infrastructure.
 - Assist projects, such as Brisbane 2032 venues, to achieve their sustainability objectives. This could include procurement sustainability targets (such as verified locally-produced materials or locally-recycled content) and commitments to achieve Green Star certification (relevant Green Star credits include: Credit 2 – Responsible Construction; Credit 6 - Responsible Structure; Credit 7 – Responsible Envelope; Credit 8 – Responsible Systems; Credit 9 – Responsible Finishes; and Credit 21 – Upfront Carbon Emissions; and Credit 40 – Market Transformation).
 - An opportunity to pilot elements of the Queensland Waste Strategy 2025-2030.

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

Targets are important and it is critical that they are ambitious. We should not be backing away from current targets, but looking for ways these can be achieved while creating valuable economic opportunities.

As noted above, while metrics such as targets for construction and demolition landfill diversion rates are influencing some positive changes, diversion rates don't tell us how much material and value is lost along

the way even when we do recycle (for example, some recovery rates are as low as 14%²). We must develop and adopt material circularity metrics and targets for recovery channels.

GBCA urges the Queensland Government to move swiftly in creating action plans for the priority products and materials identified in the Strategy, with appropriate targets and measures to encourage circularity.

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

While establishing and reporting on metrics for circularity is not always straightforward there are many resources that can help the Queensland Government to identify the most appropriate options. For example, the European Union, the Netherlands and Scotland have all developed policies, frameworks and metrics to encourage and measure circularity.

As noted previously, while metrics for construction and demolition landfill diversion rates are influencing some positive changes, only measuring progress against landfill diversion and recycling rates will not be enough to achieve a circular economy.

Please also consider the report, [Australia's waste\[d\] opportunity](#) which introduces the objective to establish national benchmarks for construction and fitout projects to increase material productivity, bring down costs, and reduce climate impacts. Page 6 of the report provides an overview of benchmarks developed with material flow data from 142 (primarily metropolitan) construction and fitout projects from across Australia. More detailed information is also available within the report.

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

GBCA strongly supports the inclusion of the built environment as a high priority area for focus and development of an action plan.

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

GBCA strongly supports the development of actions plans to support the objectives of the Strategy. We would welcome the opportunity to work with the Queensland Government to help to develop an action plan for Queensland's built environment.

As noted above, GBCA led a project on behalf of the South Australian Government to produce [Circular economy in South Australia's built environment: Action plan](#).

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?

GBCA urges the Queensland Government to consider the recommendations and findings of the Circular Economy Ministerial Advisory Group in its report, [The circular advantage](#). Harmonisation in areas such as classification of waste materials, definitions and standards and related regulations will lead to better outcomes for waste and recycling, reduced complexity and improved productivity. We urge the Queensland Government to support efforts for nationally harmonising standards.

² <https://www.dcceew.gov.au/sites/default/files/documents/apff-national-report-2020-21.pdf>

What measurable actions can you implement to progress each focus area in the strategy?

GBCA supports the strategic focus areas identified in the Strategy. The information provided above provides examples for action and progress in these areas, particularly:

- Harness economic opportunity
- Unleash innovation
- Reduce the cost of living
- Reduce impact of waste on the environment

We note the following GBCA and industry resources (in addition to those referenced above) that can further support action in the strategic focus areas:

- [Nature positive roadmap: For new developments – Draft for consultation](#)
- [A nature roadmap for the supply chain: Discussion paper](#)
- [Our homes weigh a tonne \(of carbon per square metre\): A call to action](#) and the supporting [Technical report](#)
- [A practical guide to upfront carbon emissions: For new buildings and major refurbishments](#)
- [Defining infrastructure net zero](#)