



11 June 2025

Minister Andrew Powell,
Minister for the Environment and Tourism and Minister for Science and Innovation
Department of the Environment, Tourism, Science and Innovation

Draft Queensland Waste Strategy 2025 - 2030
Submission from the Product Stewardship Centre of Excellence

Dear Minister,

This submission is made on behalf of the Product Stewardship Centre of Excellence, an independent not-for-profit charity. The Centre exists to facilitate the avoidance and reduction of waste and create positive environmental and social outcomes through sustainable design, resource conservation, reuse, repair, and recycling.

Our submission seeks to highlight the critical importance of effective product stewardship in preventing and reducing waste, increasing recycling, reuse, and repair, as well as removing unsafe chemicals, conserving resources, decarbonising the economy, and fast-tracking Australia's transition to a circular economy by 2030.

Product stewardship is a cross-cutting approach that has broad relevance to Waste reduction strategies and the four action areas of the Queensland Waste Strategy 2025-2030: Reduce, reuse, recycle, and harness economic opportunity.

About the Product Stewardship Centre of Excellence

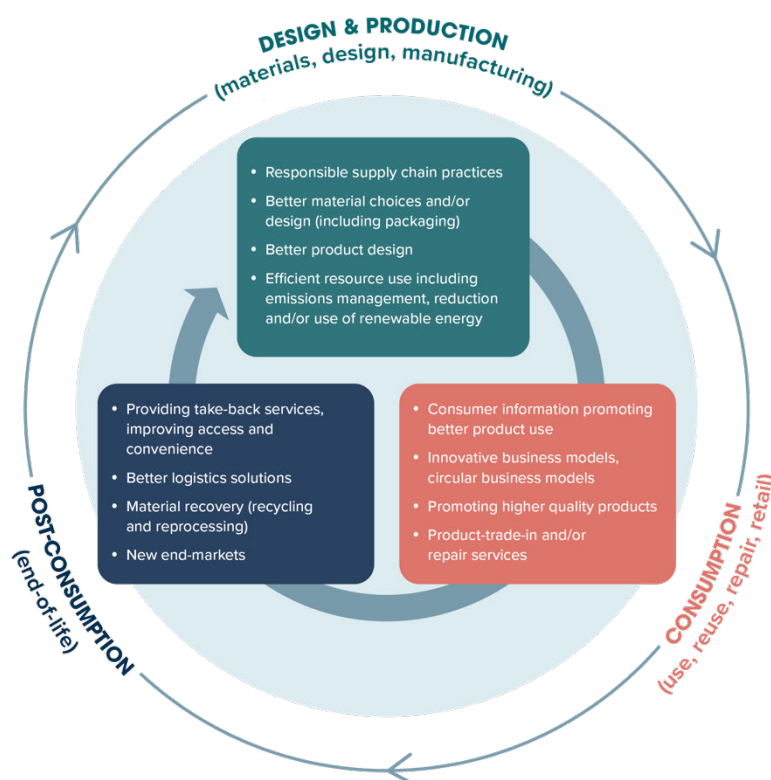
The Centre helps businesses, industries, associations and product stewardship organisations to adopt a strong lifecycle approach to deliver their ESG and circular economy objectives. The Centre also provides independent advice and guidance to governments on priority areas for stewardship and reports annually on product stewardship activity in Australia, including its benefits and effectiveness. These insights support policymakers, brands, manufacturers, and retailers in making informed decisions around product stewardship initiatives. More information about the Centre can be found here: <https://stewardshipexcellence.com.au/>

Why Product Stewardship?

Product stewardship is a proven effective approach for managing and reducing the environmental and human health impacts of products, packaging, and materials throughout their lifecycle as illustrated in the recent study on the Benefits and

Effectiveness of Product Stewardship by the Centre in partnership with the Institute for Sustainable Futures, University of Technology Sydney (see below). In Australia, the benefits of industry funded product stewardship initiatives are significant and wide ranging as demonstrated in this recent research project.

“An overemphasis on end-of-life interventions limits the opportunity to reduce environmental and human health impacts of products and materials across the whole lifecycle.” [Evaluating product stewardship benefits and effectiveness, Summary Report, May 2023](#)



Product stewardship has promoted circular design, making products more durable, less hazardous, and more recyclable. It has also led to improved production practices, contributed to CO2 mitigation, and resulted in the diversion of hundreds of thousands of tonnes of used chemical drums, tyres and machine lubricants to mobile phones, televisions and computers from landfill, and increased recovery of materials available for manufacturing. All of these predominantly funded by industry with minimal investment from government.

Benefits and Effectiveness of Product Stewardship

Product stewardship initiatives deliver a wide range of benefits including:

- **Environmental:** eliminating hazardous materials, conserving resources and materials, preventing and reducing waste, and reducing greenhouse gas emissions

- **Social:** improving workers' health and safety across the supply chain, and increasing accessibility to repair services or collection points for recycling
- **Economic:** job creation, upskilling, reskilling, and creating new markets for recovered materials

Recommendations

The Product Stewardship Centre of Excellence proposes the following recommended changes to the draft Queensland Waste Strategy 2025-2030.

1. Accelerate the adoption of effective product stewardship as a central pillar of the government's waste strategy. This should in particular focus on implementing waste avoidance measures that reduce waste and enable reuse of priority products and materials. Such action would encourage greater investment by producers, brands and retailers into necessary repair and recycling infrastructure in Queensland. These should include the following five characteristics of effective product stewardship, which integrate seamlessly with the existing proposed mechanisms:
 - a. Regulation* to enable and ensure high levels of industry or business investment and participation.
 - b. Clearly defined objectives - measurable environmental, social, and economic performance indicators demonstrate benefits and allow for continual assessment of the strategy's effectiveness
 - c. Good governance - this includes well-defined roles and responsibilities of all actors, including government agencies and ensures transparency through public reporting
 - d. Use of financial incentives - to drive behaviour change of businesses, consumers, repairers, collectors, sorters and recyclers, and to encourage private investment in new technology, recycled content products, and systems.
 - e. Effective marketing - leading to high community and business awareness and increased participation.
2. Leverage government procurement - especially in the context of major events such as those surrounding the 2032 Olympic Games - to send market signals and provide commercial opportunities for industry leaders. Procurement guidelines should be adopted that include product reparability and durability indexes, and recycled material content metrics.
3. Adoption of the [Queensland Draft E-Products Action Plan 2023-2033](#) and broadening its implementation to include other priority product classes including batteries, photovoltaics, clothing textiles, tyres, bedding, resilient flooring, furniture and treated timber.
4. Adoption of the [NSW Government's Product Lifecycle Responsibility Act](#) as the template for future state-based producer responsibility regulations in Queensland (ensuring harmonisation of state led initiatives).

Closing Comments

The Queensland Waste Strategy 2025-2030 is a significant opportunity to achieve waste reduction in the state. Adopting a whole-of-lifecycle effort, drawing upon principles of effective product stewardship, will increase the likelihood that these reductions will be achieved within the government's timeframe.

Regulated product schemes are a very effective way to enable greater waste reduction, improved recycling and give capability to circular economy policies. They unlock significant private sector investment into product stewardship actions that substantially minimise the environmental and human health impacts of products across the entire lifecycle. It also provides a practical pathway for businesses and governments to deliver systemic change.

Finally, the Queensland Waste Strategy 2025-2030 can build on the Queensland Draft E-Products Action Plan 2023-2033, which provides a blueprint for such whole-of-lifecycle efforts.

The Centre would welcome the opportunity to discuss these ideas in more detail with the Department.

Yours sincerely,

A handwritten signature in black ink that reads "Rose Read". The signature is written in a cursive, flowing style.

Rose Read

Director

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