

Packaging Impacts Consultation Regulation Impact Statement

My awareness of this public consultation arises out of a letter that Senator Don Farrell sent to me in response to a letter that I had written in August concerning Container Deposit schemes. I did not hear or read about it through any of my regular media resources. This would indicate that it has been poorly advertised to the public.

What advertising was done to alert the public to this consultation?

As someone who has lived in South Australia for most of their life and who has now shifted to Western Australia, I find that there is a marked contrast in the amount of litter which is to be seen in public places. While I will not pretend that South Australian roadsides etc are pristine, they certainly are a lot cleaner than WA. The difference is that there is CDL in SA and not in WA. We noticed the same effect when we visited Tasmania last year.

Litter represents resources of material and energy which are being wasted. Recycling these materials would actually assist Australia in meeting its Greenhouse gas targets as aluminum and glass require significantly less energy to recycle than it takes to manufacture them from virgin materials. A similar picture exists for cardboard, however not to the same extent.

The document, Packaging Impacts Consultation Regulation Impact Statement, is not designed to be read by the general public. The language is technical rather than every-day English. I wonder how many people would be prepared to work their way through it. The title alone is designed to intimidate rather than encourage public participation. How about something simpler: Reducing Packaging Waste – Invitation for public comment.

It concerns me that the following statement is made on page 15

“The CBA results do not include all of the non-market values that lead consumers to value packaging recycling and reduced litter, such as environmental benefits or a feeling of civic duty.”

I agree that it is difficult if not impossible to put a value on civic duty.

However it is possible to cost the energy/materials saved by recycling.

Table 3 on page 8 would make a good starting point for this calculation.

It is also possible to cost the amount spent on cleaning up litter.

These are not the full environmental impacts, but together they would make a useful contribution to the calculation.

The result of not putting environmental benefits into the calculation is that we do not have a proper Cost Benefit Analysis. From that it flows we (the public) cannot properly evaluate the various options presented in this document.

The paper asks a series of questions for those who respond to it.

Are the projected rates for packaging recycling and litter reduction realistic?

Answer: 100% efficiency of recycling is impossible, the 2nd Law of Thermodynamics and the diminished returns as we approach higher values ensures this. However we should aim for the highest possible level,

consistent with the process saving more in energy than would be expended in manufacturing from virgin material.

What that energy saving figure would be, varies with the material being recycled.

Some materials eg aluminium have an excellent energy return, while others eg plastics are more problematic.

☑ Are the costs and benefits identified for each option realistic? Are there any additional costs or benefits that should be factored into the CBA? Are you able to provide data to back up your views?

Answer: How do we know whether the CBA is realistic, when the environmental factors have not been costed into the calculation? This is a major flaw of this document.

☑ What impact, if any, would the options have on packaging consumption, for example would the options lead to a reduction in consumption levels?

All of the options are likely to have some positive reduction effect.

Option 1: non Regulatory approach, with the costs borne predominantly by government.

As the government is not the cause of the problem, it is not right that tax-payers bear the burden.

This approach should be rejected.

Options 2 a,b,c

Option 2a: Should be rejected out of hand as it only deals with the packaging part of the resource issue.

It gets a good BCR because it does not calculate all of the costs.

Option 2b: deals with packaging and beverage containers – this is an improvement. But what is the consequence for packaging/beverage companies if the targets are not met?

Option 2c: Is the best of these options as it places more responsibility on those responsible creating the issue. It also has higher targets, which is desirable.

Option 3 Advance Disposal Fee. This is a good option, if some of the money collected is used to fund recycling schemes that directly reward the individual. I believe that the CDL scheme in South Australia works well because people get money in their hand for putting in the effort to recycle.

I have met a number of people who refuse to be involved in household recycling schemes because for them it is too much trouble. Giving people an economic incentive helps to get around this slothfulness.

For example for many years, I collected all of waste paper and cardboard from my high school and transported it too the recycling depot. Typically this was 200- 300 kg per week. My reward for this was the knowledge that I was helping the environment. People like me are rare as I was willing to do it at my cost and get no reward. I suggest that more people would be involved in recycling if they got some sort of financial reward for their recycling efforts.

How would Option 3 work for imported products?

I note that the amount of imported food being sold in major super-markets is increasing significantly.

That represents a lot of packaging.

Option 4 Container Deposit Legislation

The weakness of both schemes is that they only deal with beverage containers.

Of the two proposed schemes the Hybrid scheme is preferable to that of the Boomerang Alliance.

☑ Do the options provide opportunities for increasing the recycling levels of other materials? If so, to what extent?

I do not see that any of the options are likely to increase the recycling of other materials.

☑ What is the likely impact of the options on costs to households and businesses?

I cannot quantify any costs as I do not have access to the data.

One area that needs particular attention is the waste being generated by the building industry. I know that this is outside of the scope of this consultation, but it is an area of significant waste production.

In conclusion, I would make the observation that packaging design can be significantly improved to increase recyclability. Standardised sized containers with a standardized formulation of components would make recycling easier. Manufacturers can get their brand differentiation by the labels that they put on it.

Yours faithfully

Clinton Garrett BA DIP T
3rd January 2012

