

30<sup>th</sup> March, 2012



Secretariat  
COAG Standing Council on Environment and Water  
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[admin@anra.com.au](mailto:admin@anra.com.au)

Dear Secretariat,

**Re: ANRA Position on the Packaging Impacts Consultation Regulation Impact Statement**

The Australian National Retailers Association (ANRA) is a member of the National Packaging Covenant Industry Association (NPCIA). ANRA's views are broadly represented in the NPCIA submission to the COAG Standing Council on Environment and Water Packaging Impacts Consultation Regulation Impact Statement (PICRIS).

For background, ANRA represents the interests of Australia's leading national retailers, across the full spectrum of retail products and services. Members of ANRA include household names in supermarkets, department stores and specialty retailers. ANRA members employ over 450,000 people and generate around \$100 billion in annual turnover.

ANRA believes the Australian Packaging Covenant represents the appropriate regulatory mechanism for packaging product stewardship within Australia. ANRA notes that only the 'base case' and Option 2A - transitioning the Australian Packaging Covenant under the *Product Stewardship Act 2011* – within the PICRIS are expected to generate a net benefit for the Australian economy.

In ANRA's view, Option 2A is the desirable outcome. This option is expected to generate the greatest net benefit to the Australian economy. ANRA's members are also multi-jurisdictional businesses and therefore see the value in achieving greater regulatory efficiency by consolidating multiple jurisdictional frameworks into single jurisdictional coverage.

Option 2A is likely to ensure greater accountability of liable parties (through enforceable penalties), lowering the scope for 'free rider' behaviour. Option 2A also provides the foundations for launching more targeted product stewardship initiatives. A co-regulatory arrangement of this nature is also flexible enough to accommodate future changes in the nature of the challenges being addressed.

If Option 2A is selected as the appropriate course of action, ANRA would welcome the opportunity to provide input into the design of any parameters used to identify liable parties – akin to the design of those used in the National Television and Computer Product Stewardship scheme.

Should you have any questions on ANRA's position on this matter please contact ANRA's Policy Manager, Mr Russell Goss, on (02) 8249 4520 or [rgoss@anra.com.au](mailto:rgoss@anra.com.au)

Sincerely,

A handwritten signature in black ink, appearing to read "Margy Osmond", written in a cursive style.

Margy Osmond  
Chief Executive