

COAG STANDING COUNCIL ON ENVIRONMENT AND WATER

8 JUNE 2012

PACKAGING IMPACTS CONSULTATION REGULATION IMPACT STATEMENT CONSULTATION SUMMARY REPORT

1. BACKGROUND

On 7 December 2011, the Standing Council on Environment and Water (SCEW) released the Packaging Impacts Consultation Regulation Impact Statement (RIS) for public comment. Public comment was sought on the following policy options:

- Option 1: National Waste Packaging Strategy
- Option 2: Co-regulatory Packaging Stewardship, with three specific sub-options
 - 2 (a): the Australian Packaging Covenant replaced by co-regulation under the *Product Stewardship Act 2011*
 - 2 (b): Industry Packaging Stewardship
 - 2 (c): Extended Packaging Stewardship
- Option 3: Mandatory Advance Disposal Fee
- Option 4: Mandatory Container Deposit Scheme (CDS), with two specific sub-options
 - 4 (a): Boomerang Alliance CDS
 - 4 (b): Hybrid CDS

Eleven public consultation sessions were arranged, in all capital cities and three regional centres (Townsville QLD, Albury NSW and Bunbury WA), commencing in Brisbane on 13 February 2012 and concluding in Sydney on 7 March 2012. Due to low registrations, the Canberra session was cancelled. In total around 250 people attended the sessions. Each session consisted of a two hour public forum, including a presentation by PricewaterhouseCoopers on the economic analysis. The sessions were followed by a series of 30 minute bilateral meetings with interested stakeholders.

The closing date for public submissions on the Packaging Impacts Consultation RIS was 30 March 2012. A total of 197 submissions were received, including four late submissions. In

addition, around 3,000 'campaign'¹ submissions were received with a form message in support of a national container deposit scheme.

This report provides a summary of the key messages arising from the public consultation sessions and public submissions. It is an overview of the main matters raised by the public regarding the Consultation RIS and should be read in conjunction with the Packaging Impacts Consultation RIS and associated documents, available at:

www.scew.gov.au/strategic-priorities/packaging-impacts.html.

2. METHODOLOGY

Submissions which did not fall into the 'campaign' category are referred to as 'substantive' submissions and were classified according to the stakeholder group they represented. A list of these substantive submissions and their stakeholder classifications is at Attachment A. Submissions were then analysed to identify the views expressed on the various options, as well as any additional matters raised relating to the RIS.

Due to the volume and use of a consistent pro-forma message, campaign submissions were analysed as a group, with any personalised messages or preferences in relation to policy options recorded.

Views expressed by participants at public forums were also considered and key themes that emerged at forums have been included in the analysis.

The consultation report discusses the views expressed in submissions in terms of the following categories:

- Problem (the policy problems that are being addressed)
- Base case (the 'no additional government action' scenario modelled)
- Options (policy options to address the identified problems)
- Cost-benefit analysis (analysis of the potential costs and benefits of the policy options to the Australian economy)
- Distributional impacts (impacts that the options will have on particular stakeholder groups – i.e. consumers, local governments, etc.)
- Data (any technical issues with the accuracy of data presented or new data provided)

¹ The SCEW Secretariat identified 'campaign' submissions as those where a pro forma email was generated by the submitter entering their details into a website and a 'non-campaign' submission as one that was individually submitted. It is noted that there were a number of 'non-campaign' submissions that contained form text in support of a national container deposit scheme, but were individually emailed from the submitter's email account.

3. SUMMARY

During the public consultation period for the Packaging Impacts Consultation Regulation Impact Statement (RIS) from 7 December 2011 to 30 March 2012, around 250 people attended public forums and many submissions were received. 197 substantive submissions were from a diverse range of stakeholders including from organisations representing industry, local government, industry/government partnerships and the community, as well as from companies, state and local governments and individuals.

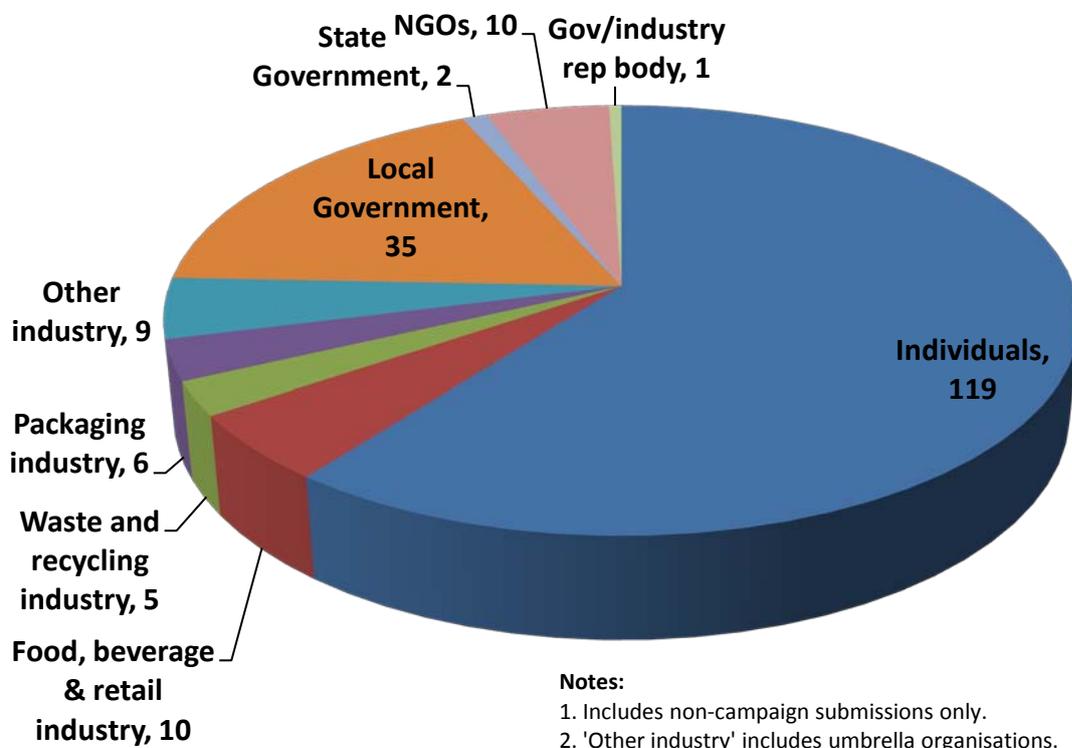
The industry submissions covered a wide spectrum of interests and were grouped by sector:

- Food, beverage and retail
- Waste and recycling
- Packaging
- Other (which captured tobacco, electronics and publishing as well as umbrella organisations representing a broad range of industry sectors).

Around 3000 submissions were a petition-style campaign (the form text of which can be read at Attachment B) expressing support for a container-deposit scheme.

Figure 1 provides a breakdown of the composition of substantive submissions by stakeholder type (it does not include the campaign submissions).

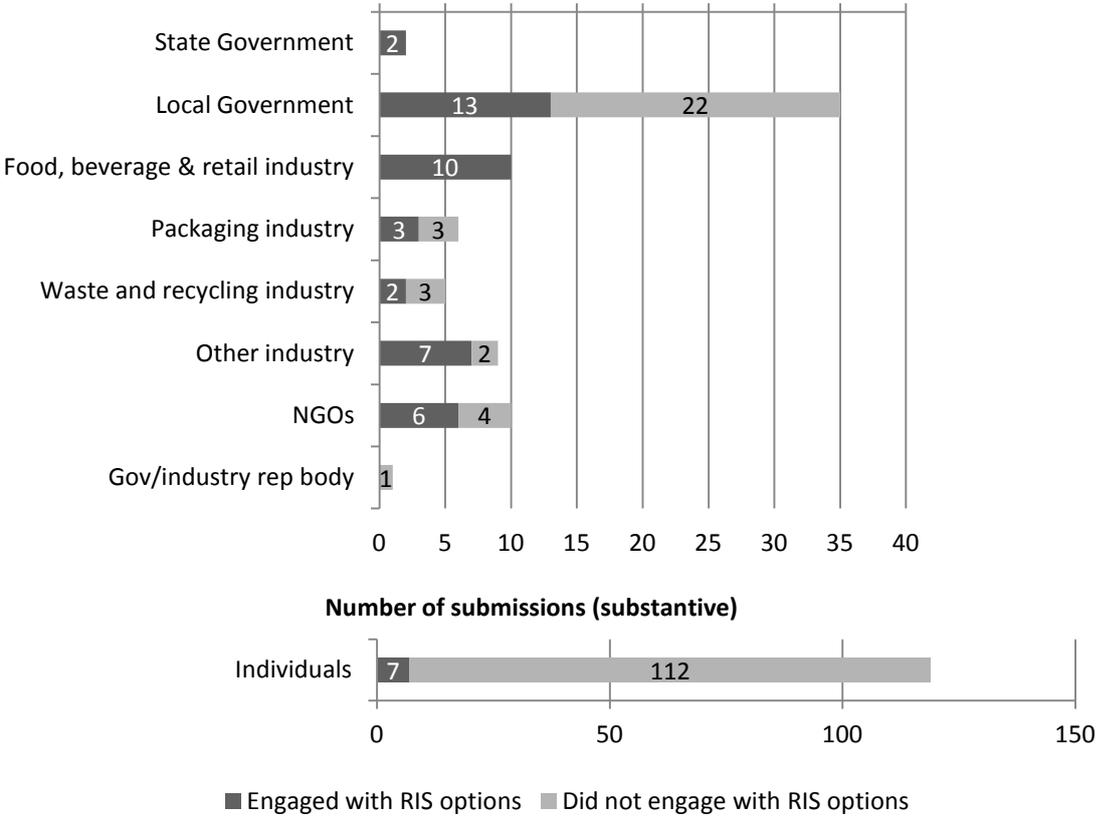
Figure 1: Composition of substantive submissions by stakeholder type



While a number of substantive submissions provided detailed discussion on the merits of the various options in the Consultation RIS, a large proportion, particularly from individuals and local

government, expressed a position in support of a particular approach without engaging with specific options. Figure 2 shows the stakeholder types and whether those substantive submissions engaged with the options presented in the Consultation RIS by discussing and expressing a view on one or more option.

Figure 2: (Split chart) substantive submissions by stakeholder type and type of engagement with RIS options



4. PROBLEM

The Consultation RIS defined the problem which may lead to government policy action as:

The key problem with the current state of packaging consumption and recycling in Australia is that Government objectives for reduced waste and increased resource recovery are not being met due to the low or suboptimal rates of recycling for glass, plastic, steel and aluminium in the commercial, hospitality and institutional sectors (away-from-home). This leads to loss of resources, increased use of landfill and environmental externalities including litter.

Another issue is that innovations in packaging design are not necessarily improving the recyclability of packaging materials.

In addition, there is a potential for increasingly fragmented jurisdictional approaches which add to regulatory complexity, increase business costs and uncertainty for investment, and fragment end-markets. The resultant inconsistency and duplication hinder the efficient operation of businesses operating in a national market.

Continued improvements in recycling rates will rely on local government who provide municipal services. The current disparity in provision of services across urban, regional and rural settings illustrates that an expansion and improvement of these services cannot be assumed.

Furthermore, the Consultation RIS stated that the objectives of government action are to:

- reduce packaging waste and increase packaging resource recovery

- reduce the need to landfill recyclable packaging materials
- reduce the negative amenity, health and environmental impacts of packaging waste and litter in line with community expectations, and
- promote a consistent national approach to regulating packaging.

This summary of the problem or the stated objectives was not questioned by the majority of substantive submissions (noting that campaign submissions did not address this).

Many substantive submissions expressed the view that producers of packaging (who are generally businesses which manufacture and sell a packaged product) lack enough incentive to reduce their use of packaging and to reduce the use of non-recyclable materials in their packaging. This was often expressed in terms that industry uses ‘too much’ packaging.

Submissions from local government emphasised the costs they bear in addressing downstream impacts of packaging waste through the operation of kerbside recycling programs for households and of litter cleanup programs in public places.

Many individuals and local governments indicated that litter was a problem of visual amenity, public safety (broken glass) and wildlife protection (generally plastics). The majority of these submissions were most concerned about beverage container litter affecting streets, highway roadsides and parks. Concerns about the impact on litter within the marine environment were also raised at the Hobart public forum. Concerns that cigarette butts were not included in the analysis were raised at a number of public forums, including in Melbourne.

A number of industry submissions (including two out of three umbrella organisations) questioned the extent of the problem, noting that the Consultation RIS ‘base case’ projects an improved level of future recycling and better litter outcomes without any additional government intervention. In terms of defining the problem, industry submissions also indicated that:

- Sustainability is not just about recycling. For example, the trend to light-weight packaging is environmentally positive even if lighter packaging materials are not (currently) recyclable.
- The relationship between recycling rates and litter volumes is contestable. For example, some submissions emphasised the importance of consumer decisions in littering.
- The concept of meeting ‘community expectations’ in relation to packaging waste and litter is not a clear definition of a policy objective.

5. BASE CASE

The **base case** is the estimate of recycling and litter rates between 2010 and 2035 if the current arrangements remain in place: including kerbside recycling in all states and territories, a CDS operating in South Australia and the Northern Territory, and the Australian Packaging Covenant arrangement continuing in operation.

Under the base case, the Consultation RIS assumes an increase in recycling from 62.5 per cent to 79.0 per cent from 2010 to 2030 and a 10 per cent reduction in litter relative to 2010.

A submission by the SA Government, and submissions by a number of NGOs and industry associations, expressed a view that the Consultation RIS presented an overly-optimistic view of future recycling and litter outcomes. At the Adelaide public forum there were also questions raised about the base case projections.

6. OPTIONS

Almost all submissions identified a need to take action to address packaging waste and litter and a large number suggested that industry should take greater responsibility for the environmental impacts of packaging.

All campaign submissions and 131 of the 197 substantive submissions expressed general support for a national container deposit scheme. Those submissions that provided discussion around the options were more mixed in their views.

6.1 OPTION 1: NATIONAL WASTE PACKAGING STRATEGY

Establishment of a **non-regulatory national strategy covering all packaging materials** and funded from additional government resources which would co-ordinate jurisdictional action to reduce packaging litter and increase packaging recycling.

Projected 81.1% packaging recovery rate by 2035.

Projected 15% litter reduction relative to 2010 levels by 2035.

A number of submissions from industry associations and the food and beverage industry supported option 1. It was supported because it is non-regulatory, promotes national consistency among jurisdictions and shows substantial recycling and litter benefits for a relatively low cost.

Several NGOs were opposed to option 1 because it still relies on taxpayer, rather than industry, funding of a suite of programs which may be expected to have a moderate impact on recycling performance but run the risk that targets may not be met. Concerns were expressed that this option may not motivate behavioural change by the producers or consumers of packaging and that it does not hold industry responsible for meeting targets.

6.2 OPTION 2: CO-REGULATORY PRODUCT STEWARDSHIP (THREE SUB-OPTIONS)

2(a)—Australian Packaging Covenant replaced by co-regulation under the Product Stewardship Act 2011. Packaging ‘brand owners’ and distributors would be liable parties under the Act. Regulations would prescribe enforceable recycling targets and other outcomes for approved co-regulatory arrangements.

Projected 80.6% packaging recovery rate by 2035.

Projected 15% litter reduction relative to 2010 levels by 2035.

2(b)—Industry Packaging Stewardship based on the National Bin Network proposal by the beverage-manufacturing sector which builds on option 2(a) with added targeted initiatives for away-from-home beverage containers.

Projected 81.9% packaging recovery rate by 2035.

Projected 15.4% litter reduction relative to 2010 by 2035.

2(c)—**Extended Packaging Stewardship** which includes all initiatives in options 2(a) and 2(b) plus larger improvements in packaging recycling and litter reduction. The focus would be identified problem areas such as low recycling rates.

Projected 86.4% packaging recovery rate by 2035.

Projected 15.4% litter reduction relative to 2010 levels by 2035.

Out of those substantive submissions that examined specific options within the Consultation RIS (see dark grey sections of bar chart at Figure 2 above), option 2 attracted the most support.

The food and beverage industry supported option 2(b) and generally accepted options 2(a) and 2(c) as viable alternatives. The packaging industry supported sub-option 2(b). One packaging industry association supported options 2(a) and 2(b). A retail industry submission supported option 2(a) since it builds on the Australian Packaging Covenant concept but provides a system of enforceable targets to guarantee scheme performance and which could better manage free-riders. At several public forums, including in Sydney, stakeholders highlighted that away-from-home recycling is not restricted to stadiums and public places, but also includes workplaces, businesses and other commercial areas.

Campaign submissions, the SA Government submission, some local government submissions, and one umbrella industry association submission, expressed concerns that plans under option 2(b) for industry to install public place recycling bins could become a responsibility for local government to maintain and empty and/or that public place recycling bins tend to get contaminated with non-recyclable material.

Concern was expressed at the Perth public forum that the projected recycling under this option was unlikely to eventuate in WA because distance factors mean that the critical mass of recycle needed to encourage investment in recycling would not occur.

Three local government representative organisations supported an extended producer responsibility approach (option 2(c)), along with a small number of individual local councils.

Two umbrella industry bodies did not support option 2 on the basis that it involves a regulatory intervention by government. These submissions expressed the view that the compliance costs and risks associated with regulation-making and enforcement are not justified by the modest benefits described in the Consultation RIS.

Some substantive submissions interpreted elements of option 2 (such as option 2(a)) as a form of industry self-regulation. This interpretation prompted some to express concerns about the extent to which industry 'could be trusted to meet targets', and noted that the Australian Packaging Covenant model had underperformed in meeting its targets in the past.

6.3 OPTION 3: MANDATORY ADVANCE DISPOSAL FEE (ADF)

A **mandatory ADF** levied on all packaging materials to influence packaging producers' choices in respect of choice of packaging material. The fee would vary depending on the type of material utilised and funds raised would be used for initiatives similar to those proposed under option 2(c). As a result, projected recovery rates and litter trends for option 3 are the same as option 2(c)

Projected 86.4% packaging recovery rate by 2035

Projected 15.4% litter reduction relative to 2010 levels by 2035

Two local government representative organisations and 3 local councils, along with a consumer-advocacy NGO and several individuals indicated support or limited support for this option.

A larger number of substantive submissions did not support option 3, including industry associations and individual companies, several NGOs and a local government representative organisation. The most common concern expressed was that an ADF would be seen by the community as a tax and that it could cause consumer prices to rise. Associated with this was a concern that a taxation approach may fail to engage individuals, industry and communities in a positive way and/or fails to take a lifecycle approach to the packaging problem.

Specific concerns expressed about option 3 related to uncertainty over how an ADF would be implemented. For example, there was a concern that, if imposed as a uniform excise duty per tonne of packaging material produced, then the financial impact on glass beverage containers would be greater than the impact on PET or aluminium substitutes, since glass containers are heavier. There were other concerns that suggested that the ADF option would exempt imports and therefore might unfairly disadvantage Australian producers of packaging or packaged products, exposing them to unfair competition from untaxed imports.

6.4 OPTION 4: MANDATORY CONTAINER DEPOSIT SCHEME (TWO SUB-OPTIONS)

[Note: The contents of campaign submissions and those submissions that did not examine particular options, most of which supported the concept of a container deposit scheme, are discussed in Section 6.5 below.]

4(a)—Boomerang Alliance CDS. A Boomerang Alliance CDS model based on a hub and spoke container redemption/collection model and a \$0.10c per container deposit. A not-for-profit organisation would consolidate deposits and collect revenue from the sale of redeemed recycle.

Projected 82.8% packaging recovery rate by 2035.

Projected 12.4% litter reduction relative to 2010 levels by 2035.

4(b)—Hybrid CDS. A CDS model based on international schemes and some data from the SA scheme. This is an industry-run scheme operated by a Product Stewardship Organisation. The number of collection points is the same as for 4(a) however with a focus on store-front style depots.

Outcomes in terms of recovery rates and littering trends are the same as for 4(a) but estimated establishment and operating costs are higher.

While all campaign submissions and a large number of substantive submissions from individuals supported the broader concept of a container deposit scheme (see section 6.5 below) only a small number discussed the CDS options outlined in the Consultation RIS. Nine submissions from individuals expressed support or limited support for options 4(a) and/or 4(b) and one individual was opposed to both sub-options.

One-third of state/local government submissions (including local government representative organisations) supported at least one of the option 4 sub-options. Local governments commonly noted that providing recycling and litter clean-up services to their residents is costly and that the implementation of option 4 should ensure that the packaging aspects of these costs are borne by the packaging industry rather than by ratepayers.

The Local Government Association of Queensland was opposed to option 4 and provided a detailed cost-benefit analysis of the potential impacts of this option, arguing that Queensland councils would bear higher costs than estimated in the Consultation RIS. In addition, some local government attendees at the Albury and Darwin public forums expressed concerns about the potential negative impacts of a container deposit scheme on local governments in relation to existing waste services contracts.

The majority of industry submissions did not support options 4(a) and 4(b). They were generally seen as expensive options that would result in increased regulatory burden on the beverage industry. Industry associations for the food and beverage industry, the retail industry, the packaging industry and umbrella organisations expressed strong concerns. Three packaging industry submissions and three food and beverage industry submissions indicated opposition to option 4. The waste and recycling industry submissions did not explicitly support or oppose option 4 but one commented that the option would require new infrastructure which competes with existing kerbside and material recovery facility infrastructure; therefore, it argued that preference should be given to policies that promote investment in new infrastructure which builds upon, and does not compete with, existing assets.

Industry comments emphasised that these options were ineffective in addressing the broader environmental impacts of packaging, and could stifle innovation in more sustainable packaging design. Some industry submissions noted that option 4 does not target away-from-home recycling specifically and has the potential to undermine existing at-home recycling systems.

Two NGOs indicated support for option 4(a) and one of these also supported option 4(b). One NGO did not support both sub-options. Boomerang Alliance was the proponent of option 4(a) and expressed the view that the Consultation RIS overestimated the costs and underestimated the potential benefits of this option. They also pointed out that the analysis of option 4(a) did not include the creation of an 'unclaimed deposit' fund to incentivise domestic recycling, which was an element of their preferred model.

In addition, a number of substantive submissions suggested that the SA container deposit scheme should have been used as a model for a national approach.

6.5 CAMPAIGN SUBMISSIONS AND OTHER GENERAL SUPPORT FOR CONTAINER DEPOSIT SCHEMES

Around 3000 'campaign' submissions came from individuals, which contained standard wording from an NGO's website and indicated in-principal support for a national container deposit scheme in Australia, stating that this is the only effective way to tackle Australia's growing problem with packaging waste and litter. A number of people included additional personal comments, such as describing favourable experiences with schemes in South Australia, Europe and North America, and referring back to when beverage companies used to pay consumers to return bottles for re-use and

opportunities for children and low-income people to earn pocket money through redeeming containers. Frustrations were also raised with the highly visible nature of beverage container litter, the danger and inconvenience of broken glass and the impact of litter on native wildlife (land and water). See Attachment B for the pro-forma text accompanying campaign submissions.

A number of substantive submissions from individuals were also generally supportive of container deposit schemes without indicating a preference for any of the options identified in the Consultation RIS. 107 individuals indicated in-principal support for the concept of a container deposit scheme but few addressed the details of option 4 in the Consultation RIS. Local governments, also, were often supportive, with 19 local governments indicating in-principal support. Of these, one local government organisation was also supportive of options 4(a) and 4(b). Three NGOs and one waste and recycling industry participant also indicated in-principle support.

6.6 OTHER OPTIONS

A common theme among substantive submissions, other than from the packaging industry, was the idea that industry should be required to design all their packaging so that it is recyclable. Some also suggested that industry should be obliged to include recycle from Australian sources in their packaging.

7. COST-BENEFIT ANALYSIS

A small number of substantive submissions commented on the cost-benefit analysis (CBA) presented in the Consultation RIS and in *Attachment C – Cost-Benefit Analysis Report*. Generally, these comments were at a high level, although some submissions engaged with the detailed analysis.

General comments in substantive submissions included:

- The costs and benefits are realistic.
- The costs are too uncertain, and the benefits do not account for upstream and other environment benefits, such as greenhouse gas reduction.
- Excluding non-use values leads to an incomplete analysis. Options 1-3 achieve significant benefits if the willingness-to-pay values are considered.
- While the willingness-to-pay results indicate residents will pay more for recycling, local government experience indicates they do not want to pay higher rates (a form of property tax).

A few of these submissions specifically commented on the costs estimated in the CBA for option 4. Some asserted that the estimated costs for option 4 were too high. Three submissions (from the SA Government, an NGO and a waste and recycling company) provided specific information to substantiate the claim that the costs estimated for option 4 were too high and questioned the estimated costs and/or projected outcomes for option 2; particularly for option 2(b) (industry packaging stewardship).

Conversely, a local government association, which had re-estimated the costs and benefits for option 4 in Queensland, argued that the Consultation RIS underestimates the participation costs and

overestimates the savings to local government for this option. Concerns were also expressed at the Darwin public forum that the participation costs applied in the Consultation RIS for a CDS were not high enough and questioned whether transport costs had been included in the CBA.

A theme in substantive submissions, including several individual submissions, was that further work is needed to assess the 'co-benefits' of different options, especially a national container deposit scheme. The Consultation RIS had identified a number of potential co-benefits: increasing recycling of other materials, reducing litter in general (not just packaging litter), increasing employment, and reducing greenhouse gas emissions and water use. Many submissions stressed that a container deposit scheme would have substantial co-benefits and these should be quantified.

8. DISTRIBUTIONAL IMPACTS

Most local government submissions emphasised that local governments currently fund the operation of kerbside recycling collection and litter cleanup services. These also recommended that any policy decision made following the Consultation RIS should ensure that the packaging aspects of these costs should be passed through to industry and consumers, as the parties responsible for packaging design and consumption decisions.

Many local government submissions expressed a view that a container deposit scheme would have the desired effect of moving part of their costs to industry and consumers; however, some commented on the need for possible compensation to waste contractors as a result of lower kerbside yields. A submission from the Local Government Association of Queensland presented analysis which indicated that container deposit schemes would not reduce local government costs. Two food and beverage industry submissions and a waste industry submission also believed container deposit schemes would bring higher costs for local governments.

Industry submissions expressed concern that regulatory interventions are likely to increase consumer prices for packaged products. Submissions by the food, beverage and packaging industries also warned that such price rises would cause substantial job losses as a result of reduced sales. Other submissions, including campaign submissions, suggested that container deposit schemes would give rise to many new jobs in the recycling industry.

Substantive submissions from individuals who favoured container deposit schemes generally expressed views that industry, not consumers, should bear the costs of such a scheme. Many indicated that they expected consumer prices to go up by only 10 cents, being equal to the value of its deposit. Campaign submissions stated that the net cost of such a scheme would be less than half a cent per container.

9. DATA

Several substantive submissions suggested that the Australian Packaging Covenant's packaging consumption and recycling data and the estimates used in the Consultation RIS for beverage container consumption and recycling were incorrect. These submissions claimed that consumption data has been underestimated and recycling data has been overestimated, leading to inflated recycling rates. An NGO submission provided re-estimated consumption and recycling data.

The Australian Packaging Covenant pointed out in its submission that its recycling data is sourced and collated from primary sources by independent consultants based on an agreed and robust methodology.

Other data was also presented in submissions, including:

- estimated price rises and job losses under a national container deposit scheme, and
- beverage container litter incidence in different jurisdictions.

ATTACHMENT A – LIST OF SUBMISSIONS

List of substantive submissions classified by stakeholder group:

Number	Respondent	Stakeholder group
001	Clint Garrett	Individual
002	Fay Briggs	Individual
003	John Tillman	Individual
004	Helen Lynes	Individual
005	Alison Dorn	Individual
006	Alex Portnoy	Individual
007	Ross Headifen	Individual
008	Horsham Rural City Council	Local government
009	Liverpool City Council	Local government
010	Northern Territory Senior Round Table	NGO
011	Bland Shire Council	Local government
012	City of Newcastle	Local government
013	Broken Hill City Council	Local government
014	Christine Jones	Individual
015	Ross Headifen	Individual
016	Dawn & Steven Tuften	Individual
017	Wentworth Shire Council	Local government
018	Wesfarmers	Food, beverage and retail industry
019	Keep Australia Beautiful WA	NGO
020	Holroyd City Council	Local government
021	Gabrielle Ryan	Individual
022	Simone van Hattem	Individual
023	Craig Walters	Individual
024	Helen McCormick	Individual
025	Sally Stent	Individual
026	Mike O'Rourke	Individual
027	Ben Bush	Individual
028	Walter Bloom	Individual
029	Stuart Dean	Individual
030	Michael Strickland	Individual
031	Josephine (Nina) Jurak	Individual
032	Shire of Manjimup	Local government
033	Dereka Ogden	Individual
034	David Whistler	Individual
035	Cassi Plate	Individual
036	Liz Thornton	Individual
037	Simone Gillespie	Individual
038	Areana Eivers	Individual
039	John Parkinson	Individual
040	Rowena Skinner	Individual
041	Glenda John	Individual
042	Wendy John	Individual
043	Mick Daley	Individual

Number	Respondent	Stakeholder group
044	Olha Brumerskyj	Individual
045	Roberto	Individual
046	Douglas Whitehead	Individual
047	Nina Scott	Individual
048	Sue Hall	Individual
049	Australian Packaging Covenant	Industry/government representative body
050	Amorina Priestley	Individual
051	Jenny Henty	Individual
052	Rosemary Sankey	Individual
053	AFROCAB	NGO
054	Robin Knox	Individual
055	Peter Mills	Individual
056	William Solomon	Individual
057	Gary Browne	Individual
058	Coca Cola	Food, beverage and retail industry
059	Government of South Australia	State government
060	Helen Wainwright	Individual
061	Johanne Green	Individual
062	Louise Sales	Individual
063	David Wyatt	Individual
064	Uniting Justice Australia	NGO
065	Peter D. Jones	Individual
066	Conny Harris	Individual
067	John Ahern	Individual
068	Signe Westerberg	Individual
069	Confidential	NGO
070	Kate da Costa	Individual
071	Dave Brigden	Individual
072	Margaret Davies	Individual
073	Ben O'Callaghan	Individual
074	Graham and Jenny West	Individual
075	Gabi Duigu	Individual
076	Umprun Incentive Recycling	Waste and recycling industry
077	Wendy Bishop	Individual
078	Rod and Desiree Mould	Individual
079	Richard Telford	Individual
080	Southern Waste Strategy Authority	Local government
081	Lara McMahon	Individual
082	Gavin Imhof	Individual
083	John Nave	Individual
084	Colin Maltman	Individual
085	Grant Evington	Individual
086	Jasmine Wigley	Individual
087	Tia Terry	Individual
088	Sarah Lam	Individual
089	Julie Marlow	Individual
090	Helen D Harris	Individual

Number	Respondent	Stakeholder group
091	Michael Hassett	Individual
092	Jane Stephens	Individual
093	Mimi Hayton	Individual
094	Matthew and Felicity Wilson	Individual
095	Dee Sier	Individual
096	Mark and Anne Verhagen	Individual
097	Suzanne Waterman	Individual
098	Alcoa Australia Rolled Products	Packaging industry
099	Carolyn Miller	Individual
100	Consumers Association of WA	NGO
101	Patricia Boyd	Individual
102	Waste Contractors and Recyclers Association of NSW	Waste and recycling industry
103	Alice Beauchamp	Individual
104	John Boom	Individual
105	Sarah Hatcher	Individual
106	Lismore City Council	Local government
107	Helen Smith	Individual
108	Margaret Makewell	Individual
109	Sjirk Bangma	Individual
110	Mandy Stubbs	Individual
111	Caroline Ryan	Individual
112	Madison Cooke	Individual
113	Anina Rich	Individual
114	Alan Wardrop	Individual
115	Mark Landmann	Individual
116	Paul Vonwiller	Individual
117	Manly Council	Local government
118	Keep South Australia Beautiful (KESAB)	NGO
119	Marion Cook	Individual
120	Lion Ltd	Food, beverage and retail industry
121	Australian Beverages Council	Food, beverage and retail industry
122	Ashleigh Kemp	Individual
123	British American Tobacco Australia	Other industry
124	Alasdair Stuart	Individual
125	National Packaging Covenant Industry Association (NPCIA)	Packaging industry
126	Bungendore - Palerang Council	Local government
127	Confidential	Local government
128	Australian Information Industry Association (AIIA)	Other industry
129	Pamela Rey and Peter Tierney	Individual
130	Lake Macquarie City Council	Local government
131	Packaging Council of Australia	Packaging industry
132	Jocelyn Seton	Individual
133	Mark Ziebell	Individual
134	City of Sydney	Local government
135	Willoughby City Council	Local government
136	Susanna Evington	Individual
137	Whitehorse City Council	Local government

Number	Respondent	Stakeholder group
138	Catriona Wagg	Individual
139	Prudence Wawn	Individual
140	Hobsons Bay City Council	Local government
141	Confidential	Individual
142	Win Chandler	Individual
143	Shire of Broomehill Tambellip	Local government
144	Wollongong City Council	Local government
145	Mindarie Regional Council	Local government
146	Andrew Judd	Individual
147	Waverley Council	Local government
148	Australian Council of Recycling (ACOR)	Waste and recycling industry
149	Orange City Council	Local government
150	Australian Chamber of Commerce and Industry	Umbrella industry group
151	Warringah Council	Local government
152	SITA Australia	Waste and recycling industry
153	Imperial Tobacco Australia Limited	Other industry
154	Mal Everett	Individual
155	Schweppes Australia	Food, beverage and retail industry
156	Australian Food and Grocery Council (AFGC)	Food, beverage and retail industry
157	Adam Guise	Individual
158	Winemakers Federation of Australia (WFA)	Food, beverage and retail industry
159	Australian Industry Group	Umbrella industry group
160	Australian Hotels Association	Food, beverage and retail industry
161	Boomerang Alliance	NGO
162	Confidential	Packaging industry
163	Local Government Association of NSW	Local government
164	Keep Australia Beautiful National Association	NGO
165	Local Government Association of Queensland	Local government
166	Gosford City Council	Local government
167	Jo Daniels	Individual
168	Peter Morris	Individual
169	Judy Blyth	Individual
170	Confidential	Individual
171	Philip Morris Limited	Other industry
172	Confidential	Packaging industry
173	Yarra Ranges Council	Local government
174	South Australian Wine Industry Association	Food, beverage and retail industry
175	Moira Shire Council	Local government
176	Municipal Association of Victoria	Local government
177	Clean Up Australia	NGO
178	Business South Australia	Umbrella industry group
179	Revive Recycling	Waste and recycling industry
180	Australian National Retailers Association	Food, beverage and retail industry
181	Kalya Micenko	Individual
182	Epson Australia	Other industry
183	Confidential	Packaging industry
184	Kael Driscoll	Individual

Number	Respondent	Stakeholder group
185	Publishers National Environment Bureau	Other industry
186	Jill Merrin	Individual
187	Shauna Forrest	Individual
188	Zena Hotker	Individual
189	Keelah Lam	Individual
190	Western Australian Local Government Association	Local government
191	Cowra Shire Council	Local government
192	Andrew Mackinnon	Local government
193	Peter Thompson	Individual
194	Ben Huxham	Individual
195	Northern Territory Government	State government
196	Moreton Bay Regional Council	Local government
197	City of Swan	Local government

RE: PACKAGING IMPACTS CONSULTATION REGULATION IMPACT STATEMENT

I wish to make comment on the *Packaging Impacts Consultation Regulation Impact Statement*.

I believe that a 10-cent recycling refund for drink containers is the only effective way to tackle Australia's growing problem with packaging waste and litter.

The beverage industry's alternative – placing recycling bins in public places – will not work and cannot take the place of a proven recycling refund solution that is already working in many countries.

Placing recycling bins in public places will do nothing to reduce litter. These bins become contaminated and vandalised and are a huge burden on the finances of local government. On the other hand, a recycling refund scheme will save money for local councils, reduce litter and pay people to do the right thing when they recycle.

For years, under the *National Packaging Covenant*, recycling targets have not been met. We cannot let ineffective solutions and flawed industry schemes distract us any longer.

The *Regulation Impact Statement (RIS)* makes it clear the main packaging problem is beverage containers with overall recycling well below 50%, and away-from-home recovery at about 22%. Beverage containers need to be the priority for action.

A container deposit scheme will cost less than half a cent per container and will generate new sustainable recycling industries, jobs and investments. A recycling refund scheme also has the potential to support a network of recycling drop-off centres that could be used to collect electronic goods and other valuable waste material for recycling.

The *RIS* says a container deposit scheme is expensive because it requires investment in new infrastructure – but this is investment by the private sector in recycling systems, which should be encouraged instead of treated as a cost.

It's important for the community to participate in recycling, but they have to know it will benefit the environment. Only a container deposit scheme delivers clean material for recycling so we can save maximum energy and resources and reduce pollution globally and in our communities.