Implementing the Container Refund Scheme in Queensland

Results of consultation

Consultation on the Implementing the Queensland Container Refund Scheme in Queensland discussion paper ran for four weeks from 17 February 2017 to 20 March 2017.

The discussion paper sought feedback on the implementation of a state-wide Container Refund Scheme (CRS) particularly around the structure and operating arrangements of the Scheme.

The discussion paper asked 13 questions structured around five different themes:

Refund payments
1. Please provide your views on the various refund options (i.e. cash, voucher, direct bank credit, etc.) that may be available to a person returning containers to a container refund point.

Refund marking
2. Do you think a logo or picture to represent the refund marking is easier to understand than the text, similar to that used in South Australia and Northern Territory?
3. Do you agree with broadening the eligibility to receive a refund to ‘participating jurisdictions’ rather than only in the ‘state of purchase’?
4. Do you support providing flexibility in the Scheme to allow for the use of more than one way to identify an eligible container (i.e. barcode technology, container shape, manual identification)?

Accessibility and infrastructure
5. What is the best way to provide fair and reasonable access to a container refund point?
6. What options might be available to the retail sector to participate in the Scheme?
7. How far would you be willing to travel and where would be a convenient location (i.e. public places and buildings, supermarkets, transfer stations, material recovery facilities) to redeem your containers?
8. How can convenience for redemption of containers and equitable access to all in the community be enhanced (i.e. co-locating container refund points with other collections such as e-waste, establishing new infrastructure)?
9. Do you think that the provision of a specific number of refund points to a certain area should be legislated?

Scheme administration
10. Do you think it is appropriate for the Queensland Government to be responsible for setting the handling fee and deciding how this is allocated among Scheme participants?
11. Do you think the Queensland Scheme should have a single Scheme coordinator or multiple Scheme Coordinators?

Implementation and review
12. What do you think might be a reasonable period for the Scheme, from time of introduction, to achieve a targeted level of access?
13. How long do you think the Scheme should operate before being reviewed?
Number of submissions

Just over 2,600 submissions were received, of which 34 were from companies or organisations, and the remainder from individuals (Table 1). Except for one submission received through the Get Involved Website, all submissions were received by email.

<table>
<thead>
<tr>
<th>Source</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individuals</td>
<td>2,600</td>
</tr>
<tr>
<td>Organisations</td>
<td>34</td>
</tr>
<tr>
<td>Total</td>
<td>2,634</td>
</tr>
</tbody>
</table>

Table 1: Summary of submissions received

Submissions from individuals

Petition from Australian Marine Conservation Society submitted by individuals amounted to 1,724 submissions. 858 submissions were received from members of the Boomerang Alliance. Responses from both these campaigns were consistent and expressed the following:

All individual responses (except 1) are in favour of a Container Refund Scheme.

Common comments provided include:

- 10c refund should provide the right incentive
- Wine bottles should be included in the scheme
- Reasonable access to convenient locations to redeem refunds is essential
- Councils and community organisations must have fair access to container refunds and/or handling fees from containers they have collected
- Barcode marking on eligible containers should be mandatory to prevent fraud and monitor the scheme’s progress
- Remote and community run collectors should have access to regional redemption points
- A scheme coordinator should comprise of a number of stakeholders. The scheme coordinator should be an independent, not-for-profit organisation.
- The scheme coordinator should report on the scheme every 4 years.
- The scheme should be self-financing with the beverage industry covering the costs of the scheme
- All containers collected must be recycled
- Targets should be enforced and consistent with international standards
- Severe penalties should apply for breaching scheme conditions and contracts.

Submissions from organisations

A total of 34 submissions were received from organisations (Table 2). A list of organisations is provided at Appendix 1.
Implementing the Container Refund Scheme in Queensland

<table>
<thead>
<tr>
<th>Sector</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste industry</td>
<td>5</td>
</tr>
<tr>
<td>Local government</td>
<td>9</td>
</tr>
<tr>
<td>Environment</td>
<td>7</td>
</tr>
<tr>
<td>Beverage and retail industry</td>
<td>7</td>
</tr>
<tr>
<td>Other</td>
<td>6</td>
</tr>
<tr>
<td>Total</td>
<td>34</td>
</tr>
</tbody>
</table>

Table 2: Submissions received from organisations

**Beverage and retail sector**
Seven submissions were provided by the beverage and retail sector.
The main aspects identified were:

- The refund marking must be generic and consistent across all schemes and need not be text or be part of the label. Instead the refund mark could be incorporated into the container and be located on a part of the container that is least likely to be damaged.
- Flexibility in the scheme operation will ensure that costs are minimised
- Refund points need to be located in reasonable proximity to consumers and returning eligible containers needs to be convenient.
- Government should set the handling fee in consultation with the Product Responsibility Organisation.
- The beverage industry sees no disadvantage in having a single coordinator for the scheme. The benefits of this approach include a potential reduction in scheme establishment, management and operating costs.
- The beverage industry believes that it is best placed to operate and administer the scheme
- The scheme should be reviewed within two years of operation with a further review of the functionality and success of collection points after five years of operation.
- Harmonisation between the Queensland and NSW schemes will reduce costs and logistical imposts on beverage manufacturers such as the labelling, container approval, refund mark and refund amounts.
- Legislation is critical for the good governance of the scheme and in ensuring that the operations of the scheme are transparent and subject to proper audit and review.
- Appropriate penalties and sanctions are critical to deter fraud.
- Consideration should be given to potential adverse effects on the operation of existing kerbside systems.
- The retail sector supports non-mandatory participation in providing container take-back or collection points.

**Local government**
Eight individual councils and one representative organisation provided submissions.
The main aspects identified include:

- The potential impact on kerbside services due to some loss of material as a result of the scheme.
- Councils with kerbside stated that the introduction of the scheme should have no negative financial impact on existing kerbside recycling services.
- A mix of standalone and mobile refund points is appropriate.
- Local government sees a role and a benefit for local government participation in regional and remote areas.
• The scheme needs to cognisant of vast distances in Queensland and that access points will need to be convenient for people.
• A review of the scheme should occur within six months and then every two years.

**Environment organisations**
Seven submissions were received from environment organisations. Environment organisations are supportive of the scheme.
The main aspects identified were:
• The scheme must be convenient for consumers
• The scheme must be transparent and have an efficient system of cash flow and refund return
• Must be complementary to kerbside services where present
• Clear targets and penalties must be established
• Coordination should be through a not-for-profit entity to ensure accountability of the whole system
• There must be accessibility across the state.

**Waste industry**
Five submissions were received from the waste industry.
The main aspects identified were:
• The scheme should be consistent with New South Wales
• The scheme should allow for more than one way to identify eligible containers. Logos were preferable to text.
• There should be a single scheme coordinator
• Preference was given to a cashless refund system to reduce possible fraud
• Consumer convenience for return and refund is critical to the success of the scheme
• Consumer behaviour change is likely to take longer in QLD compared to SA where a culture and habit for refillable containers already existed prior to the introduction of the CRS.
• Preference for Queensland Government to legislate retailer participation
• A review of the scheme should occur after five years

**Other organisations**
Submissions were received from the scouting and guiding movement as well as charities and not for profits. Whist all the submissions from these organisations supported a container refund scheme, concern was raised about the extent to which charities and not-for-profits would actually benefit.
Common issues identified were:
• Organisations suggested a scheme that would allow charities and not for profits to accept containers and collect refunds and/ or handling fees
• Legislation to ensure community organisations and charities benefit from the scheme and are not sidelined by large corporate entities
• 10c refund should provide the right incentive
• Beverage manufacturers should wear the cost
• Legislate the number of collection sites
Appendix 1 - Organisations that made submissions

Local government
Local Government Association of Queensland
Mareeba Shire Council
Logan City Council
Moreton Bay Regional Council
Douglas Shire Council
Cairns Regional Council
McKinleyShire Council
Mackay Regional Council
Cloncurry Shire Council

Retail and beverage industry
Australasian Association of Convenience Stores
Australian Beverages Council
Craft Beer Industry Association
Association of Container Deposit System Operators
Diageo Australia
Exchange for Change
Shopping Centre Council of Australia
Winemakers' Federation of Australia
Woolworths

Other organisations
Guides Queensland
Scouts Queensland
Lutheran Youth of Queensland
Queensland Outdoor Recreation Federation
St Vincent de Paul

Waste industry
Australia and New Zealand Recycling Platform Limited
Cleanaway Recycling
Closed Loop
Container Deposit Systems Australia
Ecobox Solutions
Impact Recycling
Tomra Collection Solutions
Implementing the Container Refund Scheme in Queensland

Environment
Sunshine Coast Environment Council
Australian Marine Conservation Society
Boomerang Alliance
Tangaroa Blue Foundation
Greenpeace
Positive Change for Marine Life
Wide Bay Burnett Environment Council