Subject: RIS and Container Deposit Scheme submission

I write as a private individual, and cannot comment on the technical aspects of the CRIS and supporting documentation available for public comment beyond the following points which I consider relevant:

1. ABARE's assessment of the CRIS made the completely unsupported statement that South Australia's CDS scheme could not be assumed to work as well across Australia, given Australian's assumed lack of interest in relatively low refund amounts in our current wealthy state. Should we assume therefore that South Australians are either much less wealthy than all other Australians, or more easily incentivized by the prospect of the occasional extra 5cents, than any other Australian? This seems nonsense. There seemed no explanation for the fact that the CDS in South Australia seems to be working, and no reason given for the statement that this could not be extrapolated.

There seemed to be no attempt to establish through survey questions whether Australians (particularly children in need of pocket money) regarded refunds as worth the effort. I refuse to believe that Australians are so wealthy that none of them will make the effort to seek refunds.

2. Comparative studies were made of a number of overseas schemes. No justification was given for selecting the schemes in question - one would think that the most successful (measured by volume or quantity of recycled beverage containers, or by financial viability) would be assessed. References were made to the German system, but this was not fully assessed - I believe it would be profitable to use the German system of product packaging recovery overall, and in particular, of beverage packaging.

3. My experience, fairly limited to frequent but short visits there, is that in Germany, manufacturers are legally responsible for recycling their products and packaging. This incentivizes them to reduce packaging overall, and to use materials which are easy and cost-effective to collect and recycle or reuse. This in turn creates a cultural system where people are very diligent about recycling (a culture we should encourage by using CDS as social engineering to move towards, rather than simply assume that Australians can't be guided to reduce litter and care more about recycling). This, like the carbon tax, simply moves the true cost of packaging and materials onto the manufacturer, and through their pricing, the consumer, rather than spreading it over the whole community. Consumer demand for products with less packaging, and more recyclable packaging, which relate to cheaper products, can be seen by the type of packaging in Germany.

4. If South Australia can run a CDS, why on earth can't the rest of the country. If the price of carbonated sugar drinks, alcohol or bottled spring water goes up by 5c a container, which can simply be recovered by the consumer when returning to a RVM or collection point (like any scout hall with its cage of squashed cans), how can that be a difficult problem. It seems to me that manufacturers would be mad not to go along with this scheme, as uncollected refunds are simply profit for them.

My understanding of the documents is that many factors, especially the pressure to change beverage packaging in the future, were inadequately assessed in a very narrow theoretical modelling exercise, which simply left out those cultural and social behaviours which economists find difficult to quantify, but which nonetheless exist, and will effect any scheme.

The CRIS seemed an exercise in delaying action, and hoping for some non-mandatory, non-regulatory magical mechanism to keep millions of drink containers out of land fill. Container deposit schemes may not be perfect, but will make a quick improvement both to litter, and to manufacturing decisions on the use of non-recyclable materials.

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