**Subject:** Packaging Impacts Consultation Regulation Impact Statement

Dear Sir/Madam

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

I believe that a 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 of placing recycling bins in public places will not work effectively and therefore cannot take the place of a recycling refund solution that is already working in many countries and of course has been operating successfully in South Australia for over 30 years. Further evidence of the effectiveness of a CDS can be obtained from Clean Up Australia figures where the numbers of beverage containers picked up in South Australia (on Clean Up Day) are more than 25% less than those picked up in other states.

Placing recycling bins in public places will do nothing to reduce litter. These bins will 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 reward people for doing the right thing when they recycle. And the scheme has the added advantage of returning money to the community through groups such as the Scouts, who will organise clean-ups in a bid to raise funds.

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. CDS is the only way to quickly and sustainably remove an extra 4 billion beverage containers a year from the litter and landfill streams and build a network of recycling depots around Australia.

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 also be used to collect electronic goods and other valuable waste material for recycling. So it’s time stop doing studies and implement a CDS.

It’s worth considering this salient point. Every day the Commonwealth delays a national container deposits system another 9 million recyclable beverage containers go into landfill. 9 million! Further, some of those 9 million are ending up as litter in our public areas, waterway & oceans. 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.

Thank you

Gavin Imhof