



The Office of the General Manager

30 March 2012

Standing Council on Environment and
Water Secretariat
GPO Box 787
CANBERRA ACT 2601

Dear Sir/Madam

Re: Submission on Packaging Impacts Consultation Regulation Impact Statement

Thank you for the opportunity to provide feedback on the Packaging Impacts Consultation Regulation Impact Statement. In 2010, Willoughby City Council passed a motion to support Container Deposit Schemes as a way of increasing recycling rates, reducing the volume of litter in our parks and reserves and reducing the financial burden on our ratepayers by reducing the cost of kerbside recycling systems. The success of take-back schemes such as South Australia's container deposit legislation, which achieves recycling rates of over 80%, shows that the 65% National Packaging Covenant target is not only achievable but could be surpassed.

Willoughby City Council, as with all Councils and Shires in Australia, plays a significant role in the collection, treatment and disposal of waste and recycling for both the domestic and commercial sectors. We are also responsible for cleaning up litter and public place waste and recycling and are burdened by the ever increasing cost of disposal for these materials. We also provide waste education programs to promote public place recycling, and litter awareness.

Willoughby City Council believes that a best practice Container Deposit Scheme will achieve an increase in resource recovery and a decrease in litter. We also believe that under a Container Deposit Scheme, funding will be made available to promote public place recycling and litter awareness.

Of the options outlined in the RIS, only 4 (a) and (b), offer a Container Deposit Scheme. Therefore these two options would be favoured by Willoughby City Council. A CDS is proven to minimise costs to Local Government and could also benefit the community by potentially facilitating the collection of other packaging materials such as cardboard and paper, as well as other items such as e-waste and hazardous materials at the same collection/drop off points as the beverage containers.

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The Australian Packaging Covenant (APC) claims that the increase in the overall recycling rate in Australia is due to improvements in paper and glass recycling and investment in infrastructure projects. From a local government perspective we have seen little evidence of the APC carrying out its objectives or providing assistance in infrastructure provision or collection of recycling. We are also seeing an increase in non-recycling packaging and complex blends of plastics, often found in beverage containers, which are not recyclable and are causing contamination issues at our MRF's. We would like to see the APC working harder with their stakeholders to focus on the design reusable and recoverable packaging.

Two areas that have been overlooked in the Consultation RIS, are the impacts these options may have on Climate Change in terms of a reduction in green house gas emissions and the impacts the Carbon Pollution Reduction Scheme may have on the recycling industry under each of the proposed options.

We look forward to seeing how the feedback from the Consultation RIS will help formulate a national approach to addressing the issues of packaging resource recovery and litter reduction.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Nick Tobin', with a long horizontal line extending to the right.

Nick Tobin
GENERAL MANAGER