

D12/7240

30 March 2012

Standing Council on Environment and Water Secretariat
GPO Box 787
CANBERRA ACT 2601
Email: secretariat@environment.gov.au



Dear Standing Council on Environment and Water Secretariat,

ORANGE CITY COUNCIL'S SUPPORT OF A NATIONAL CONTAINER DEPOSIT SCHEME AND SUBMISSION REGARDING THE CONSULTATION REGULATION IMPACT STATEMENT ON PACKAGING

Orange City Council is writing to express our ongoing support of the introduction of a national container deposit scheme (CDS). At Council's meeting on 3 June 2010, Council resolved to express our commitment to the introduction of a CDS by writing to both NSW State and Federal Governments. Letters were sent to the then respective ministers for the environment, The Hon Frank Sartor and The Hon Peter Garrett.

Council reaffirmed its commitment to a national CDS at its Environmental Sustainability Community Committee meeting in March 2012. Orange City Council is committed to the reduction of litter in its local government area (LGA). A national container deposit scheme will reduce the prevalence of beverage container litter more than any other form of mitigation measure.

Containers by their very nature and capacity to float and accumulate pose a significant visual impact on the environment. By placing a value on an item of waste that has somewhat of a bad reputation within the community, one can quickly observe positive outcomes in changing community behaviour in how this waste item will be perceived i.e. it now has a financial return benefit to the consumer and secondly, there is a tangible link between the consumer and the recycling entity that will ensure its re-use once returned to a collection centre. The value that a consumer places on their effort to recover this waste item (particularly if it was a form of litter pollution) is even more valuable than the financial return.

A CDS would offer numerous benefits. Existing schemes and research show the following:

- Thanks to a container deposit scheme that has been operating successfully for over 30 years, South Australians currently recycle more than 80 per cent of their recyclable containers seeing the virtual disappearance of container litter;
- New data shows the national recycling rate of beverage containers is about 40% - down from the 48% claimed in the Packaging Regulatory Impact Statement. It's the biggest problem facing the packaging industry;

ORANGE CITY COUNCIL'S SUPPORT OF A NATIONAL CONTAINER DEPOSIT SCHEME AND SUBMISSION REGARDING THE CONSULTATION REGULATION IMPACT STATEMENT ON PACKAGING

30 March 2012

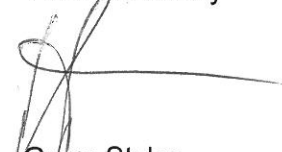
- Every day the Commonwealth delays a national container deposits system another nine million recyclable beverage containers go into landfill; and
- CDS is the only way to quickly and sustainably remove an extra 4 billion beverage containers a year from the litter and landfill streams and build a network of recycling depots around Australia.

Council has also reviewed the recently released Consultation Regulation Impact Statement (RIS) on national measures to increase packaging recovery and decrease packaging litter. With respect to the RIS, Council have the following comments:

- In Council's view, the RIS understates the benefits and overstates the costs of environmental policies. In Council's experience and opinion, the RIS contradicts the evidence from real life operating CDS which shows considerable benefits;
- The failure to do a financial analysis that reveals the financial impacts on industry and consumers, when previous research has shown CDS will cost half a cent a container;
- The RIS fails to include the financial benefits of more jobs and extra non-container materials going to CDS drop-off centres; and
- The RIS treats theoretical industry options such as more bins and advertising as having the same validity as proven schemes such as a CDS. A major problem also found by ABARE in its peer review of the RIS.

Orange City Council supports the RIS option of a mandatory national Container Deposit Scheme as Council estimates that the scheme will double the recycling rate, clean up the litter, create jobs, reduce pollution and provide a system for better waste management for other goods, such as e-waste and batteries. The other options provided in the RIS offer strengths and advantages. If these positive aspects were combined with a mandatory CDS, a robust waste management strategy would be achieved.

Yours sincerely



Garry Styles
GENERAL MANAGER