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Standing Council on Environment and Water
Consultation Regulation Impact Statement
SCEW.Secretariat@environment.gov.au

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Dear Madam/Sir,

**Australia must immediately implement a container deposit scheme (CDS) in order to
reduce waste and greenhouse gas emissions**

I live in the beautiful Northern Rivers of NSW, and come from a legal and education background. I thank you for the opportunity to comment on the Consultation Regulation Impact Statement, and look forward to continued input into this matter.

Deep and immediate GHG emissions reduction must be a cornerstone of the RIS

The RIS does not put enough emphasis on limiting packaging and waste in order to reduce GHG emissions. Without immediate action by Governments at all levels to drastically cut GHG emissions across all policy areas, there is the real risk of catastrophic climate change. Instrumental to achieving GHG reductions is the implementation of a national CDS coupled with product stewardship laws that impose a real financial disincentive to overconsumption and wasteful practices; as well as factoring in the real environmental impacts of packaging and waste on GHG emissions, biodiversity loss and degradation of our life support systems of water, air and soil. Government must be proactive, pre-emptive and progressive in implementing these necessary measures to avert catastrophic climate change.

CDS already exist and are proven to be effective!

South Australia has a CDS that has been operating successfully for over 30 years. Because of this scheme, more than 80 per cent of recyclable containers never see landfill, which means container litter has virtually disappeared.

The Northern Territory is soon to implement a CDS, and many progressive and wealthy European nations, such as Sweden, Germany, Denmark and Norway have operated economically and environmentally successful CDS schemes for decades.

Beverage container recycling rate figures used in the RIS are inaccurate

Data shows that the national recycling rate of beverage containers is about 40%¹ - down from the 48% claimed in the Packaging Regulatory Impact Statement.

Implementation of a CDS is cheap!

The RIS fails to do a financial analysis that reveals the financial impacts on industry and consumers, when research shows that CDS will cost only half a cent a container.

A CDS means more jobs!

The Cost Benefit Analysis (CBA) used in the RIS fails to include the financial benefits of more jobs and extra non-container materials going to CDS drop-off centres.

Single use plastic bags should be banned or levied

The RIS fails to address single use plastic bags, which have significant environmental impacts.

The CBA used in the RIS ignores the detrimental impacts plastic bags have on our environment. Plastic bags are a major litter problem in our parks and waterways, and can result in the deaths of many turtles, Cetaceans, birds, and other species. The accumulation of plastic in our oceans has dire consequences for the health of numerous marine and bird species, with subsequent negative health implications for humans.

More bins and advertising is NOT the same as a proven CDS

In its peer review of the RIS, ABARE found that a major problem is that it treats theoretical industry options such as more bins and advertising as having the same validity as proven schemes such as a CDS. When there have been numerous litter campaigns, educational awareness programs and advertising regarding littering, with minimal effect, industry cannot avoid addressing real solutions to reducing waste.

¹ <http://m.smh.com.au/environment/environmental-groups-claim-320000tonne-black-hole-in-official-recycling-figures-20120213-1t2aw.html> ; <http://www.boomerangalliance.org.au/cash-for-containers/cash-media/73-black-hole-in-australias-recycling-of-packaging.html>

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.

Delay on implementing a CDS means more containers go to landfill

Every day the Government delays a national CDS, another 9 million recyclable beverage containers go into landfill. It is therefore imperative that government implements a CDS sooner than later.

Implementation of a CDS is a win-win for taxpayers, governments and the environment

A national CDS will double the recycling rate, clean up the litter, create jobs and reduce pollution and provide a system for better waste management for other goods, such as e-waste and batteries.

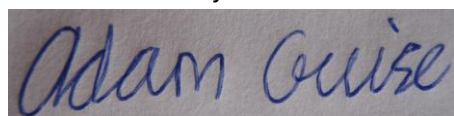
In summary, a CDS has the potential to:

- reduce the volume of litter in our parks, beaches and roadsides by 12-15%;
- significantly reduce the number of turtles, lizards, seals and birds killed by litter across Australia;
- achieve a 6% diversion of all Municipal Solid Waste away from landfill;
- reduce Australia's GHG emissions by over 1.3 million tonnes of CO₂ per year (equivalent to 197,000 homes switching to 100% renewable energy);
- save enough water to permanently supply over 24,000 Australian homes;
- deliver the same level of Australian air quality improvements as taking 140,000 cars off the road;
- provide 250,000+ Australian homes with access to recycling services for the first time;
- save rate payers over \$59.8 million per annum; and
- increase Australia's recycling by over 630,000 tonnes per annum.

I trust you will take my recommendations on board and implement them into Government policy.

Once again, thank you for the opportunity of having input into the consultation process.

Yours faithfully,



[submitted electronically]

Adam Guise