

30<sup>th</sup> March 2012

[SCEW.Secretariat@environment.gov.au](mailto:SCEW.Secretariat@environment.gov.au)

The Secretary  
Standing Council on Environmental and Waste Secretariat  
GPO box 787  
Canberra, ACT 2601

Dear Sir

Re: Packaging Impacts Consultation RIS.

Epson Australia Pty Ltd is a subsidiary of the Seiko Epson Corporation (SEC) whose headquarters are in Japan. Our principal function in Australia is the import and distribution of computer printers, projectors, scanners and peripherals.

We have most recently, and continue to be, involved with the E-SIG (Environment Special Interest Group) of the AIIA (Australian Information Industry Association) and are working with a number of OEM's (Original Equipment Manufacturers) in a co-regulatory framework in relation to the Product Stewardship Act.

We have reviewed the Packaging Impacts Consultation RIS and note the various proposals for change to the managing of packaging waste. We are also aware of the successes of the Australian Packaging Covenant (APC) (and previously the National Packaging Covenant).

Epson Australia is a small company in Australia with a very lean staffing structure. All our products are imported in a fully packaged state (as part of global distribution) - no re-packaging is carried out in Australia. Although our parent adopts environmental designs in packaging we have little ability to influence this as our parent seeks to ensure packaging is minimised (in order to reduce shipping costs) to the maximum extent possible.

In addition, our sales into the consumer market are not direct with our customers (often going through multiple distribution layers) and the packaging is ultimately removed in the home so that it can be recovered via domestic recycling and/or local council recycling schemes or customers retain the packaging for later use.

The APC has made in-roads into reducing packaging finding its way into waste streams, and we realise that it appears its focus is falling on companies using Sustainable Packaging Guidelines (SPG) it has developed, and reduction of litter.

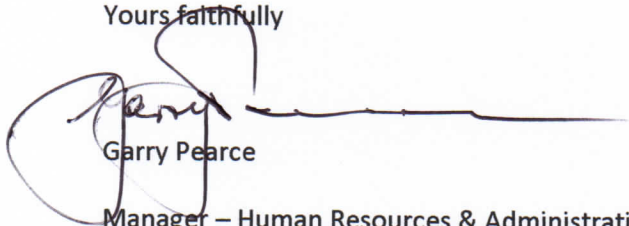
Epson believes that given its past success that the current APC should be maintained. To enter into any co-regulatory type of arrangement at this stage would take the focus away from the successes of the APC, and possibly add extra cost burdens to business (which we have seen in the Co-regulatory Framework for the Product Stewardship Act).

We believe that now that the APC has been running for several years it should be more focussed on where real improvements can be made in packaging design and reduction of litter, rather than pursuing a "catch-all" policy that treats all packaging as being of equal concern.

In our view the current APC format should remain, but consideration be given to reducing the burden on those companies (where packaging is out of their hands) whose parent company is already taking environmental considerations into account in their packaging.

Should you have any questions or require further comment, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Garry Pearce', with a long horizontal flourish extending to the right. The signature is written over the printed name and title.

Garry Pearce

Manager – Human Resources & Administration