



Care For Hedland Environmental Association Inc.

A.B.N. 11 873 448 055

Registered Association Number A1011932D

PO Box 436

Port Hedland, Western Australia, 6721

Sarah McEvoy

Executive Director, Strategic Policy

Department of Water and Environmental Regulation

Level 4, The Atrium, 168 St Georges Terrace, Perth WA 6000

Locked Bag 33, Cloisters Square WA 6850

Submission in Response to WA Container Deposit Scheme Consultation Regulation Impact Statement

Dear Ms McEvoy,

The Care For Hedland Environmental Association (now on referred to solely as the Association) is an independent environmental group based in Port Hedland, in north-west Western Australia. The Association has a membership of just over 160 members from Port, South Hedland and Wedgefield and has a diverse demographic of short term to long term residents, local business/industry, community and indigenous representation. The protection and ongoing sustainable management of the coastal environment of Port Hedland and the surrounding area is one of the Association's primary areas of focus. The Association has for fourteen nesting seasons been conducting a local volunteer Flatback Turtle (*Natator depressus*) monitoring program along Cemetery Beach and Pretty Pool Beach.

The Association would like to thank the Department of Water and Environmental Regulation for the opportunity to provide comment on the WA Container Deposit Scheme and once more for the consultation RIS.

As long-time advocates of recycling and waste minimisation, the Association strongly supports the implementation of a CDS in WA. The Association ran their own localised CDS from 2009-2012 to great effect, helping to reduce general litter and broken glass litter hazards in residential areas. We would welcome such an initiative again, particularly state-wide.

The Association's stance on the implementation of a CDS in WA has not changed since the previous submission. Taking into account several changes to the scheme as noted in the consultation RIS, the Association wishes to state their preference to include all containers in the CDS, such as those smaller than 150mL and those that may be less likely to become litter. Allowing all containers to be recycled through the CDS will encourage good habits in the household and may mean that less containers enter the waste stream instead of the correct recycling stream. As mentioned in the CDS RIS, the lack of responsibility taken by producers of beverage containers is a market failure and the Association looks forward to seeing how this can be addressed. Avoiding waste and the need to deal with recyclable containers should be the first priority, which lies with the producers of the beverage containers.

With regard to imported containers from New Zealand, it would be worth adding the CDS refund symbol to all of these containers as they are equally viable in the recycling stream. The strong crossover between Australia and New Zealand, as well as New Zealand citizens' push for governments to introduce their own CDS, support the idea that these containers should be included in Western Australia's scheme. This would also be forward thinking for a time in the near future when New Zealand and Australia's CDSs align.

The Association is in agreement that liquid paperboard should be left out of the CDS. This would present less confusion for consumers.



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The costs of changed behaviour due to a CDS (holding on to container to refund later and picking up containers that would otherwise not have been picked up) were not included in the analysis due to a lack of available data. In low socioeconomic areas, or in areas with many people of a low socioeconomic background, the Association believes that such behaviour would make a large difference to the costs of a CDS and it is important not to discount such potentially positive behaviour changes. The Association understands that it is difficult to quantitatively measure these factors but would appreciate them not being discounted in the evaluation of the viability of a CDS.

The Association's views on the questions posed by the CDS RIS are below.

1) Do you think that the reform objective (set out in section 2) is appropriate?

The revised objectives are broader than the original objectives, however, engaging the community in active and positive recycling behaviours is perhaps the most important as this changing of behaviours is what will make the most difference to WA recycling rates, allowing the rest of the aims to follow. The Association feels that it is important to retain the element of community engagement as an objective, alongside waste avoidance and recovery helping to minimise environmental impacts.

2) Do you think that the proposed CDS (Option 2 – set out in section 3.2) will achieve the reform objectives in Western Australia?

Option 2 is preferable to option 1 and would be more attractive with the aforementioned changes that the Association would like to make to the current scheme.

3) Do you support the introduction of the proposed CDS (set out in section 3.2) in Western Australia?

Yes, the Association is supportive of the proposed CDS, preferably with the above changes.

4) Do you believe the proposed CDS will deliver a net benefit to Western Australia (Cost benefit analysis is set out in section 4.1)?

Yes, this appears to be an appropriate analysis.

a) Do you believe that the analysis of the costs and benefits under-estimates, over-estimates or omits any of the costs or benefits arising from the proposed scheme?

The Association believes the analysis under-estimates the benefits of the scheme and omits the benefits gained from consumers changing behaviours in the scheme. However, as previously mentioned, the Association understands that this data is difficult to quantify. All other relevant costs and benefits have been included.

5) Do you believe the proposed CDS will result in an appropriate distribution of the costs and benefits between stakeholder groups (set out in section 4.5)?

The Association believes that producers of beverage containers should bear more of the overall cost of the CDS in Western Australia, however, understands that these costs are likely to be passed on to consumers by the producers so as to benefit the producers.

6) Do you think there would be any unintended consequences from the proposed CDS?

a) Yes / No

No, the Association believes that a CDS would bring only positive benefits to Western Australia across the economic, environmental and social sectors.

b) If Yes, then please specify



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7) Do you think the proposed implementation process and timing are appropriate?

The Association is pleased that a CDS will be implemented in Western Australia and welcomes its commencement as soon as possible to reap the benefits from a CDS, protect the natural environment from preventable litter and reduce landfill.

8) Do you have concerns with Western Australia obtaining exemptions under the MR Act and the TTMR Act?

No, the Association is happy for this to take place and follow on from existing CDS framework in other states.

9) Any further comments from stakeholders.

The Association would like to reiterate that refund points should be at easily accessible locations, such as retail centres, as stand-alone points and donation points, as well as at existing recycling centres. These are the locations that people would be most likely to bring their recycling to, rather than at sporting and entertainment events or public events. Having refund points near to retail facilities means that the cash generated from the recycling can be immediately spent, which is convenient to consumers and encourages them to recycle. In the past, with the Association's Cash For Trash and Recycle Day initiatives, there have been dedicated drop-off points and the Association feels that this would be the best option as much of the community is already in this habit.

On top of this, the Association would be keen to operate a dedicated refund point, given our prior experience in this area since 2009 and status as the sole environmental group in the town of Port Hedland. Not only would this benefit the Association as extra publicity for our programs, but the CDS and its benefits would be further highlighted through our social media and communication channels throughout the community.

The Association again thanks you for the opportunity to be involved and would welcome the opportunity to remain involved in the process going forward. The Association would also welcome the opportunity to be involved in any further review and consultation of the current CDS for Western Australia.

For anything further regarding the above submission, please do not hesitate to contact myself directly.

Kind regards,

Jo Smith

Association Coordinator

Care For Hedland Environmental Association