

Dear DWER

Many thanks for the invitation to submit responses to the CDS RIS. I am chiefly concerned about the statement:

*“Beverage suppliers (manufacturers, importers, wholesalers or retailers) that bring eligible containers into Western Australia will be responsible for funding the refund and associated costs.”*

This smacks very much of the South Australian method whereby the 10c is collected by the Beverage Companies and then refunded to claimants. The flaw in that method is that the Beverage Companies get to pocket (keep) the 10c from the estimated 20% of eligible containers that are never returned for a credit.

Seems to me that the Beverage Companies should collect the 10c, forward that money to the Regulator and then the Regulator should pay the refund. The 20% unclaimed, will fund the Regulator.

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

Yes – subject to my opening remarks.

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

Yes

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

Yes

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

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

No

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)?

Yes

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

a) No

b) If Yes, then please specify

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

Yes

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

No

8) Any further comments from stakeholders.

Nil

Kind regards,

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Murray 