

# Submission on the NSW Environment Protection Authority's Driving NSW's circular economy: Discussion paper on enhancing the NSW Container Deposit Scheme

December 2022

## Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission therefore represents the consolidated view of Western Australian Local Government. However, individual Local Governments and Regional Councils may have views that differ from the positions taken here.

MWAC endorsed this Submission at its meeting on Wednesday, 14 December 2022.

## Introduction

WALGA welcomes the opportunity to comment on [Driving NSW's circular economy: Discussion paper on enhancing the NSW Container Deposit Scheme](#).

Since its introduction in 2017, the NSW Container Deposit Scheme, known as Return and Earn, has contributed to significant litter reduction across the state, raised recycling rates and delivered more than \$1 billion in refunds to the community.

The NSW Environmental Protection Authority (EPA) is seeking feedback from community, industry and government sectors on proposed expansion of the scheme.

The *Driving the NSW Circular Economy discussion paper* examined four options to expand the Return and Earn scheme in order to deliver further benefits to the community.

These were:

1. Glass only expansion of the Scheme
2. Comprehensive expansion of the Scheme to capture a broad range of additional beverage containers
3. Comprehensive expansion of the Scheme to capture a broad range of additional beverage containers plus plain milk containers
4. Dedicated kerbside glass bin.

While all options were found to deliver a net benefit, the preferred option identified (Option 2) proposes the expansion of the Scheme through the inclusion of a broad range of additional beverage container types.

South Australia undertook a consultation process, between 2019 and 2021, to gauge community and industry feedback on proposed changes to the state's Container Deposit

Scheme. This consultation showed broad support for expanding the range of beverage containers included in the SA Scheme.

Queensland's government announced in November 2022 it will soon seek feedback on expanding its Scheme to include glass wine and spirit bottles at a minimum.

WALGA acknowledges the significant environmental and community benefits provided by individual schemes since their inceptions, and that the reviews present an opportunity for aligning the scope of containers across states to assist in developing consistent national frameworks and messaging. WALGA's [Policy Statement on Container Deposit Schemes](#) has been used as a basis for this Submission. In particular these criteria have been used to assess whether there is benefit in including these materials in the Scheme:

- a) *Does the material or container type cause significant environmental or social impacts?*
- b) *Does the material or container type cause significant costs for waste processors?*
- c) *Does the material or container type have unrealised potential for recycling / resource recovery?*
- d) *Is the material or container type likely to be disposed of illegally?*
- e) *Does the material or container type cause significant community concern?*
- f) *Is there an alternative system in place to recover the material or container type effectively?*

This Submission provides feedback on the proposed scope and type of materials to be included in an expanded Return and Earn Scheme.

## Comments

The expansion of the Return and Earn scheme proposes the inclusion of glass wine and spirit bottles, cordial and concentrated fruit juice containers, alongside increased size limits for beverages already included in the Scheme.

The changes are estimated to add an additional 417 million containers to the scheme each year. Plain milk containers and health tonics are proposed to remain excluded. The proposed changes for each container type are outlined in Table 1.

### **Do you support an expansion in scope of containers included in the NSW Scheme?**

The expansion in scope of containers in the NSW scheme will deliver a range of benefits including increased diversion of glass from kerbside recycling bins leading to cleaner streams of separated material for processing, further reduction of litter and clearer messaging surrounding eligibility.

### **Do you support the proposed containers that would be included in an expanded scope?**

The inclusion of glass wine and spirit bottles, cordial and concentrated juice containers and increase in size of currently accepted containers is supported, as these changes will reduce community confusion around accepted items and potentially provide more incentive to participate at both household and commercial level.

The Discussion Paper outlines the continued exclusion of plain milk and alternative milk containers from an expanded Scheme on the basis these are already effectively recovered through the kerbside system, are a staple item in households (including low-income) and are not considered a high-volume litter item.

WALGA acknowledges these points, however, based on an assessment against the criteria included in the WALGA Policy Statement, would support the inclusion of these materials in an expanded scheme in order to recover higher rates of quality materials and provide further incentive for householders to divert these materials from landfill, particularly in areas where kerbside recycling may not be accessible.

Inclusion of plain milk and milk alternative containers also has the potential to increase commercial participation in the scheme, through the high volume of container types used by the hospitality sector.

Consultation feedback from South Australia conducted in 2021 has indicated a high level of interest in including milk containers in an expanded Scheme, with only 12% of respondents in favour of continuing to exclude plain milk containers.<sup>1</sup>

Table 1: A summary of the current and proposed container types

<b>Beverage type</b>	<b>Accepted in current scheme</b>	<b>Proposed inclusions</b>	<b>WALGA Comment</b>
Wine and spirits	Wine and spirits in plastic containers from 150ml to 3L  Wine sachets (plastic and/or foil) 150ml – 250ml  Wine in aseptic packs 150ml – 1L	Wine and spirits in glass containers from 150ml to 3L  Wine sachets (plastic and/or foil) 250ml – 3L  Wine in aseptic packs 1L – 3L	<b>Support</b>
Fruit and vegetable juice	All container types 150ml – 1L	All container types 1L-3L	<b>Support</b>
Flavoured milk	All container types 150ml – 1L	All container types 1L – 3L	<b>Support</b>
Concentrated fruit and vegetable juice (intended for dilution)	Not accepted	All container types 150ml-3L	<b>Support</b>
Cordial (undiluted)	Not accepted	All material types 150ml – 3L	<b>Support</b>
Flavoured alcoholic beverages with a wine base	Aseptic packs 150ml – 1L	Aseptic packs 1L – 3L	<b>Support</b>
Plain milk and milk substitutes	Not accepted	Not accepted	<b>Suggest including in the Scheme</b>
Registered health tonics	Not accepted	Not accepted	<b>Support</b>

<sup>1</sup> [Improving South Australia's Recycling makes cents – Consultation summary report](#)