

# Draft Container Refund Scheme Bill 2021

Summary of feedback received from public consultation



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# Executive Summary

During the public consultation process there were 101 formal submissions received for the proposed draft *Container Refund Scheme Bill 2021*. Encompassing the views of local government, regional groups, industry representatives, waste and recovery businesses, commercial and not-for-profit organisations, and individuals. Additionally there were 3334 responses to the online survey, and over 130 attendees in five webinar sessions.

Within the submissions received, there were two campaign responses, encouraging individuals and organisations to send in a template submission. These campaign responses comprised roughly 40 per cent of the submissions received. The first template response (10 received) originated from beverage industry lobby group TasRecycle, and the second template response (25 received), originated from the Tasmanian Hospitality Association in conjunction with TasRecycle. There were seven responses heavily based on the template responses but added some additional information.

Overwhelmingly there is support for the introduction of a Container Refund Scheme in Tasmania and approval for the drafted Scheme. Only three per cent of submissions stated they did not support a Scheme at all – this related to concerns about what more could be done around litter and waste, recycling and resource recovery in Tasmania.

Community benefits was the standout theme throughout the submissions – specifically it was important the introduction of the Scheme would provide opportunities for charities, sporting clubs, and community groups to see the greatest possible financial and employment benefits from the Container Refund Scheme.

An area of contention identified in the submissions related to the governance arrangements – specifically whether a ‘split responsibility’ model is going to result in the best outcomes for the most people.

Some submissions raised concern the proposed ‘split responsibility’ governance approach, particularly with regards to which model would provide the greatest benefits to Tasmanians. Contention over the governance model was reflected in the number of submissions comparing various Container Refund Schemes in other Australian states and territories – particularly NSW/ACT and QLD/WA.

However, across all submissions comparing different Scheme approaches, the intent was clear that Tasmania should take the opportunity to learn from successes and challenges in other jurisdictions ensuring we have the best possible Scheme.

The key topic areas identified in the submissions are:

- Scheme governance
- Scheme harmonisation
- The role of charities and community groups
- Implementation
- Financial implications
- Logistics; and

- Implications on small beverage

This report also covers the results of the short online survey and the webinar sessions.

Work is now being undertaken to integrate the feedback from the submissions, survey results and webinar conversations into the policy design for the Scheme. This is to ensure that the Tasmanian Container Refund Scheme will be effective in meeting the needs of the community, as well as achieving the objectives of reducing litter and increasing recycling rates.



# Introduction

In June 2019, the Minister for Environment announced the Tasmanian Government would be introducing a Container Refund Scheme (CRS) in 2022. As a result, the Department of Primary Industries, Parks, Water and the Environment (DPIPWE) is developing a Scheme that would best serve the Tasmanian community. As part of this process, a Ministerial Advisory Group (MAG) and an Expert Reference Group (ERG) have formed to advise on the design of the Scheme, with stakeholders represented from the beverage, retail and hospitality industries, the waste and recycling sector, environment groups, local government, and charities.

In February 2021, it was announced Tasmania will have a ‘split responsibility’ governance model, bringing together all relevant sectors to deliver the best Scheme for Tasmania. The split responsibility model – which operates in NSW, ACT, and has been announced as the Victorian Government’s preferred model – involves a Scheme Coordinator who will run the administration and finance for the Scheme, while a separate Network Operator/s run the network of Refund Points.

To prepare for the implementation of the Scheme in 2022, the *Container Refund Scheme Bill 2021* (the Bill) was drafted. The Bill is the legislative mechanism for the introduction of the Scheme, and covers the establishment of the Scheme, requirements for container approvals, and identifies Scheme participants. It also explains the administration of the Scheme, including the roles of Scheme Coordinator, Network Operator/s, and other key participants

The Bill was released for public consultation on 5 June 2021 and closed 9 July 2021. Supporting materials included an Explanatory Paper describing how the provisions of the Bill will operate, and a Regulatory Impact Statement which assesses any potential restrictions on competition, impacts on business, and general benefits and costs. DPIPWE officers also conducted webinars with the general public, local government and targeted stakeholders to discuss the impact of the Bill and ran a short survey. The public consultation revealed broad support for a Container Refund Scheme in Tasmania and the Government was commended on the initiative. Approximately half of the written submissions expressed general support for the Bill, for the objectives of reducing litter and increasing recycling, and the contribution this will make to the Circular Economy. The Scheme was also welcomed for its potential to benefit community groups and charities.

*“...it is expected that the proposed Tasmanian CRS will deliver a noticeable decrease in the amount of public beverage container litter and positive changes in the general recycling behaviours of the community...”*

Submission from Australian Grape and Wine

Many submissions nostalgically referred to a glass bottle collection service that previously existed in Tasmania and indicated that the proposed Scheme is a welcome continuation of beverage container recycling. These submissions expressed that it was “*about time*” Tasmania had a CRS and the Scheme in Tasmania was “*long overdue*”.

While there was a range of feedback about the design and implementation of the Scheme, only three per cent of submissions indicated they are against a Container Refund Scheme. These submissions were still broadly in support of litter reduction and reducing waste but believe there are other approaches than the Scheme to achieve these objectives.

# Scheme Governance

## Support Split Responsibility

Many submissions stated support for the split responsibility governance model. A common suggestion was the split responsibility model prevents the monopolisation of the Scheme.

*“Each scheme partner has distinct drivers for cost efficiency, high consumer redemption rates, good citizen access and scheme integrity. The Scheme Coordinator is motivated to manage the scheme’s costs efficiently, while the Network Operator is motivated to increase participation and drive container returns”*

Submission from Cleanaway

It was provided that the split responsibility model balances the interests of the beverage industry with the interests of resource recovery, logistics, not-for-profits and local government. Submission feedback also indicated the split responsibility model ensures accountability and best-practice design, and it creates a positive commercial tension and clarity for stakeholders.

## Against Split Responsibility

Of the submissions received, 58 raised concerns with the split responsibility model - 35 of which were template submissions. A number of these were concerned that the Network Operator role would act as a ‘middleman’ and impede the ability of community groups to get the maximum benefit from the Scheme. This theme was consistent throughout the responses against split responsibility.

*“...concerned that the model proposed by Government delegates considerable authority to Network Operators to decide who enters the scheme and the terms under which they participate in the scheme. For example, a Network Operator could decide to enter into an arrangement with one or two refund collection point providers in order to minimise the number of contractual arrangements they need to manage. This is not consistent with a decentralised model in which local communities have a strong say and role in the scheme.”*

Submission from SelfHelp Workplace

Other submissions perceived the Network Operator role to be “an additional layer of bureaucracy” and would result in a scheme that was “over governed”. It was argued that by having a split responsibility model, key management activities are duplicated, resulting in higher costs for organisations and consumers, and lower return rates.

Some of these submissions noted the difference between the recommended model in the 2018 Marsden Jacobs report, a single operator model, and the Tasmanian Government’s preferred split responsibility model. These submissions did not feel the reasoning for a different model had been adequately explained.

As an alternative, some submissions note that they would support a split responsibility



model that permits multiple Network Operators. In this context, there was also support for the Refund Points operating separately from the transport and processing elements of the Network Operators. This model was also argued to give more opportunities to small and medium sized business and maximise return rates.

## **Interstate and International Schemes**

Throughout the submissions there were often comparisons made to Container Refund Schemes in other Australian states and territories, as well as international Schemes. These comparisons were sometimes positive, focusing on the achievements of other places with these Schemes which have often been in place for a long period of time, and that Tasmania should follow in their footsteps. These submissions often also focussed on the positive recycling rates in places where Container Refund Schemes are in place, particularly European countries.

Conversely, some of these submissions were negative, particularly about different governance models in different parts of Australia. These submissions are often focussed on a criticism of the Network Operator in NSW and ACT as a 'monopoly model'. These submissions are also concerned that the NSW governance model does not support charities and community groups as much as the QLD/WA governance model, and for this reason suggested that Tasmania should align more with QLD/WA.

Across all of these comparisons, the intent was clear that Tasmania should take the opportunity to learn from successes and challenges in other jurisdictions to ensure we have the best possible Scheme that will benefit the most people and most effectively achieve the objectives of the Scheme.

# **Scheme Harmonisation**

A consistent theme throughout the written submissions was the need for harmonisation across the various Container Refund Schemes in Australia, and on a range of elements. The primary areas where harmonisation was supported were eligible containers, refund amount, refund marking, and administrative processes. Across Australia, the States are working to harmonise on refund amount, container approvals, container eligibility and administrative processes.

## **Eligibility of Containers**

There was mixed support for harmonisation of eligible containers across Australia. Some submissions suggested partnering with other jurisdictions to share eligibility systems already in place, and that harmonisation should be maintained to enhance interjurisdictional consistency and reduce administrative burden, confusion and complexity. Other submissions encouraged and supported enhancing product stewardship principles by moving beyond beverage containers 'littered' and 'consumed away from home' and suggested that many recyclable containers should be included such as juice, milk, cordial, wine, spirits, and household items such as detergent, cleaning agents, oils.

The submissions also provided mixed feedback on whether eligible containers should

require barcodes. Some submissions indicated that barcodes may be an obstacle to anti-litter objectives and discourage people from collecting litter, while others suggested that requiring barcodes reduces fraud when compared to the weight-based system. There was also discussion about the condition of the containers when returned, such as crushed cans or glass bottles with peeled-off labels.

Submissions pointed out that current eligibility requirements are inconsistent between containers for wine, spirits, cider and beer, particularly those that come in 750ml bottles. Some submissions argued that all these beverages and container types should be included in the Scheme because it would be less confusing for consumers and result in better returns. This feedback tended to acknowledge that while this approach would not be in harmonisation with other States, it supports a broader product stewardship approach, would better utilise all recyclable materials, and enhance material processing capacity.

*“If the purpose is to recycle, reduce litter and reduce landfill - then let’s capture everything. How about Tasmania becoming a world leader in this space...”*

Submission from King Island Cloud Juice

Other submissions wrote that wine, spirits, cider and/or beer containers should be excluded. Feedback indicated that the exclusion of wine is consistent with other State legislation and suggested that alcohol bottles are generally not part of the litter problem, that these beverages are generally consumed at home or at licenced venues, and that there are existing initiatives for addressing resource recovery, recyclability and circular economy objectives in the wine industry. The key feedback regarding the eligibility of alcoholic beverages was that there is currently an inconsistent application of eligibility with some beverages and types of containers.

## Refund amount

There was broad support for harmonisation of the 10c refund amount to reduce Scheme costs and administration, and to ensure consistency across schemes. However, a number of submissions questioned the 10c refund, pointing to reports that suggest that 10c is not enough financial incentive to return containers. Some of these submissions argued that the refund amount should be greater than 10c and suggested a European model where refund amounts vary based on container type and may be up to 50c per container, while others opposed suggestions to increase the refund amount as it could exacerbate market distortions and argued that there is no evidence that increasing the amount would result in higher redemption rates.

## Refund marking

National consistency on the refund marking was broadly supported. Submissions stressed that a consistent refund mark is crucial to ensure the smooth implementation of the Scheme and to reduce the impact on producers and the time needed to transition.



## Administration and IT systems

A key element of harmonisation raised in written submissions was the administrative processes, including container approvals and registrations, IT systems, reporting processes, and auditing. It was suggested that harmonising these elements will avoid the duplication of effort and the need to use multiple systems. There was some support expressed for a single national system for container approvals and other administrative elements of the Scheme. A number of submissions suggested that Tasmania should use the same IT system as is used in the Queensland and Western Australian Schemes.

## Small Beverage

The local Tasmanian beverage industry raised concerns about aspects of the Scheme that will disproportionately impact their industry over big beverage. Key issues were labelling, registration of containers, potential fees for scheme involvement, as well as administrative and labour costs. As small beverage producers operate on a much smaller margin than big companies, the introduction of the Scheme could create challenges for these smaller operators. Some submissions noted that they feel an expectation to raise prices and pass these costs onto the consumer, and their concern is that this will push them out of a competitive market.

*“I am also very concerned that the compliance costs for small producers would add yet another layer of costs to products that have to work hard to compete in what is a commodity-based industry.”*

Submission from Ashbolt Farm

Some beverage industry submissions argued that the inclusion of smaller local beverage producers in the Scheme would not contribute to the Scheme objectives, as they produce boutique and premium products. It is argued that these products are not contributing to litter, and because they are already being captured by the current kerbside recycling process, their inclusion in the Scheme would not assist with litter reduction in Tasmania.

A number of these submissions also indicated that it is important that all containers that meet the appropriate recyclability criteria should be included in the Scheme, including wine. A discrepancy was noted between boutique cider and beer companies (many of whom bottle in 750ml glass bottles) and the wine industry, who use the same packaging but are currently exempt from the Scheme. These submissions note that their beverages are consumed in the same contexts as wine, and thus should be exempt for the same reasons.

# Community Groups and Charities

Some submissions noted their appreciation of DPIPWE and Tasmanian Government for their engagement with the charity sector during the development of the Scheme. A consistent theme in most submissions were a desire for community groups to receive the maximum possible benefits from the Scheme. Many submissions noted that the Scheme is an important revenue raising opportunity for community groups, and the importance of community groups being considered throughout the Scheme development process. This was raised particularly in relation to the ability of smaller organisations to have the same opportunities for involvement as bigger organisations.

*“A third objective of the Bill should be to maximise the community participation in the scheme by encouraging a wide range of individuals and organisations to participate in the collection, return and processing of beverage containers.”*

Submission from Nexus Inc.

Submissions from organisations who wish to become a Refund Point noted that they are concerned about their ability to create meaningful employment opportunities and financial benefits under the current model where they would have to sub-contract with the Network Operator, and thus not receive the full handling fee. Most submissions concerned with Refund Point Operators contracting through the Network Operator came from the template submissions. Another focus was on ensuring that all interested community groups can nominate to receive container refunds as donations, such as obtaining a Scheme identification number and receiving donations as a direct deposit to the community group’s bank account. A comparison point raised was the NSW model which limits donations to ‘eligible charities’.

*“The Government must ensure that all community groups and charities are eligible to have refund donations paid directly to them, at the Refund Point.”*

Submission from Launceston PCYC

Some submissions suggested that there should be a mandated minimum involvement of community groups within the scheme, to ensure that the Network Operator is not able to “lock out” small organisations.

*“Noting the imbalance in negotiating power of the charity sector when dealing with large multi-nationals, and often a lower level of resource and organisational sophistication. The experience of charities in the implementation of interstate schemes has often seen charities marginalised or excluded, after expending a relatively significant amount of scarce resources on preparation to participate.”*

Submission from Charitable Recycling Australia

Further submissions also identified the need for community groups and social enterprises to be embedded in the governance structure of the Scheme to counter the previously



mentioned imbalance between small community groups and large national or international companies likely to be involved in the scheme.

*“Charity and Community groups can bring a viability to a broader reach of collection points, via an extensive geographic spread, lower costs through an ability to mobilise volunteer members and the broader community, and often the willingness to take a smaller commercial return without the need to reward shareholders. However, to achieve this in a realistic, effective, and efficient way, participation at many levels within the scheme will be needed.”*

Submission from Charitable Recycling Australia

## Financial and employment benefits

Many of the submissions from the community and charity sector focused on the potential employment and financial benefits that could arise from the introduction of the Scheme. These submissions point out that to achieve maximum container collection, and therefore litter reduction, there need to be strong incentives for community groups to participate fully in all elements of the Scheme. This includes groups being able to directly receive donations at the Refund Points, the creation of business opportunities, local jobs and training opportunities for local people, and active participation that can provide regular income for community organisations.

# Implementation

## Refund Points

The submissions indicated broad support for a variety of Refund Point infrastructure to meet diverse community needs. It was suggested that having multiple options can allow small businesses, non-government organisations, volunteers and social enterprises to be involved, and that Refund Points should include proactive signage, surveillance and enforcement strategies to deter anti-social behaviour. Suggested Refund Point types include:

- Automated kiosk such as reverse vending machines. Some submissions suggested allowing multiple automated kiosk providers to encourage competition. It was also suggested that the Legislation should allow for other types of automated technology that don't provide refunds, but can accept and sort containers, and divert refunds to charity organisations.
- Staffed depots, including drive-through services
- Bag-drops
- Over-the-counter returns
- Pop-up drives
- Waste transfer and recycling centres
- Existing kerbside recycling
- Dedicated collections at commercial premises and events

It was suggested that the Regulations should provide standards for the operation of

automated kiosk and other Refund Point types. It was also suggested that there is a voluntary opt-in approach to Refund Points such as automated kiosks and over-the-counter returns, as opposed to mandating who must be a Refund Point.

A key theme regarding Refund Point locations was that they should maximise opportunities for refunds and equitable access for consumers, including locals and visitors, with minimal effort to consumers. Many submissions suggested that consideration should be given to regional and metropolitan consumers separately to ensure needs are met across the community, and that there should be a minimum network standard for Refund Points based on convenience and accessibility for consumers.

*“...there is a clear added benefit of the government mapping out proposed collection point locations in order to mitigate the risk of some areas being underserved while others having operators in close proximity of each other...”*

Submission from Waste Management & Resource Recovery Association Australia

There was mixed feedback on using retail settings as Refund Points. Some feedback indicated support for the inclusion of retail liquor outlets as Refund Points, and that retail stores and local businesses are convenient for consumers because they are high activity areas. Other submissions cautioned against using retail as Refund Point operators due to potential difficulties with space, security, material handling and costs.

In locating Refund Points, submissions also noted key safety considerations, such as noise, hours of use, and using low-risk premises. Location suggestions included areas of residential density, where automated machines could be installed for either refunds, or no-refund donations, and automated donation machines could also be installed like post-boxes in convenient areas.

## Education and Awareness

Some of the submissions noted the importance of an appropriate education and awareness campaign for the Scheme to be a success. This includes educating the public on the condition of the containers that can be returned (i.e. crushed or not crushed, lids on or off, cleanliness of containers), where they can be returned, and the cost-benefit balance of the Scheme. The submissions noted that an important part of this is clarifying which entity – Scheme Coordinator, Network Operator, or both – is responsible for education and marketing. The submissions noted that this education and awareness campaign will need to address the disparate educational standards across Tasmania, with some areas likely to need significantly more investment in ‘Plain English’ and visual educational material.

*“...a key component of the Container Deposit Scheme must be to foster greater inclusivity and accessibility through consideration for visual picture-based labelling...”*

Submission from Brighton Council

Some submissions also noted that a communications plan needs to be developed and implemented well ahead of the commencement of the Scheme to support behavioural change from consumers, and so all participants are adequately prepared for the new Scheme. They also noted the need for this communication and education campaign to be ongoing throughout the early lifespan of the Scheme.



In tackling the key objectives of the Scheme, some submissions also indicated that if litter is a key target for the Tasmanian Government, there must be other education and awareness initiatives implemented to focus on problematic litter streams such as fast-food packaging, cigarettes, plastics, papers and cardboard, and on targeted litter strategies such as increased bins, public education and surveillance.

## Planning

A small number of submissions raised concerns about the potential planning processes related to the implementation of the Container Refund Scheme. The submissions sought seamless planning approval for Refund Points and associated infrastructure to ensure the straightforward rollout of the Scheme.

*The smooth operation of the planning system is essential to the efficient rollout of collection points.*

Submission from Boomerang Alliance

## Material Split

Some submissions indicated that a main benefit of the scheme would be the ability to sort containers into types and colours by using barcode scanning, resulting in increased value through lower material contamination. It was suggested that future initiatives could incorporate other single-use packaging materials which would also benefit from material sorting. It was suggested that having staffed depots as Refund Points could allow for greater separation of materials, such as glass by colour, PET by colour, HDPE, liquid paperboard, aluminium and steel. It was recommended that the Network Operator doesn't compact and mix material types on collection to avoid contamination and complicate processing. Conversely, one submission noted that crushed cans should also be included in the Scheme, to assist with transport of bulk deliveries from remote areas to depots.

## Material Recovery Facilities and Kerbside Recycling

Concerns were raised about the impact that the Scheme will have on kerbside recycling, as it is expected that the Scheme will divert material from kerbside bins which could have cost implications on councils and rate payers. Some respondents were concerned that the Scheme may make kerbside recycling more expensive and less viable and were concerned about the impact on local government and rate payers.

*“There is a concern that the CRS will divert significant volumes of recycling away from the system, affecting the viability of the kerbside collection, including increasing the costs and reducing efficiencies with transport/collection.”*

Submission from the Local Government Association of Tasmania

One respondent also expressed concern at the possibility of individuals 'raiding' kerbside recycling bins to look for recyclable material and creating litter problems. One local Council questioned whether there would be penalties for contaminated kerbside recycling materials going to landfill, which is based on the current requirement that all Scheme material is recycled.

Submissions also queried how Material Recovery Facilities (MRFs) will receive a refund for the material they process, and how this refund will be shared with local government. Generally, both councils and MRF operators recognised an opportunity to benefit from the Scheme by receiving the refund for containers collected through kerbside recycling. One respondent expressed support for a 50/50 split of the refund between MRFs and councils, and another respondent emphasised that MRFs should only receive the refund, and not a handling fee. One respondent suggested that Tasmania should use the WA model of MRF payments and refund sharing. One council was concerned that MRF processing costs would reduce the share of the refund received by council.

The potential complexity of agreements between the Scheme Coordinator, MRFs, and local government was also raised by some respondents, and it was suggested that the need for agreements between each individual council and the relevant MRF should be avoided. One respondent also suggested that the definition of material recovery facility in the draft legislation should be revised, as the current definition could potentially include Refund Points and/or processing or sorting centres run by the Network Operator. There was a request for further clarity on issues such as how the Scheme will impact on councils and kerbside recycling, as well as remote and regional communities, and whether there will be a compliance role for councils.

## Scheme targets and Reporting

A number of submissions recommended that clear scheme targets be adopted, including for the volume of containers collected and recycled, as well as for the network of Refund Points. It was suggested that these be made publicly available and be set well in advance of Scheme commencement. One submission raised the inclusion of scheme targets in the tender documents for the Network Operator and Scheme Coordinator. Some submissions also asserted that it is important for the Scheme to meet the 'Buy Local' policy in the appointment of scheme participants including the Network Operator, Scheme Coordinator, and Refund Point Operators. The 'Buy Local' policy *"specifically requires the Government to develop strategies to provide local industry with a full, fair and reasonable opportunity to participate in each tender process."* (Submission from TasRecycle)

To ensure scheme redemption targets are met, and fraud is minimised it will be important to verify the number of returned containers, and submissions were made as to how to best do this.

Submissions were also made on monitoring and reporting requirements of the Scheme. One submission suggested that reporting should be regulated with a reporting code, and another submission recommended frequent and transparent reporting, including quarterly updates on sales and returns. A further submission recommended that Tasmania divide responsibility for monitoring, reporting, and auditing between the Scheme Coordinator and Network Operator in line with the division of responsibilities currently in place in NSW, with the Network Operator responsible for monitoring and reporting, and the Scheme Coordinator responsible for auditing. It was also recommended that the Network Operator should transparently and periodically report on the handling fees paid to third party organisations in the scheme as a percentage of total fees received.

## Regional Access



A key message in the submissions was that all Tasmanians should have reasonable access to a Refund Point. There was a perception that having one Network Operator could cause non-metropolitan and rural areas to be overlooked for Refund Point locations, and submissions from regional areas sometimes indicated an interest in operating Refund Points and/or registering as local charities.

Another key message related to the King Island and Flinders Island areas and existing community recycling and resource recovery initiatives. These submissions indicated that the Scheme should be complimentary to (and not negatively impact) these established and effective initiatives. Other considerations for the Bass Strait Islands included waste transport logistics and the commercial viability of the Scheme on the Islands. King and Flinders Island Council's requested further consultation on how the Scheme will work in their unique situation to ensure that they can benefit fully from the Scheme.

*"The small populations, size and scale of activities on the Islands and their physical separation from mainland Tasmania create significantly different logistical challenges and expensive cost structures to mainland Tasmania."*

Submission from King Island Council

## **Timeframes**

Many submissions indicated that the Tasmanian Container Refund Scheme is long overdue and expressed an eagerness for the Scheme to be implemented. Feedback in the submissions indicated that an implementation period of November-January, the Easter period, or at the end of the financial year, would cause difficulties for various stakeholders. Other submissions noted that a lead time of at least 16 weeks is required for adjustments to systems in preparation for implementation.

# **Financial Implications**

## **Scheme Cost and Price Increases**

A number of the submissions raised concerns with the cost of the Scheme, both to the beverage industry and also to the public as consumers. Some submissions have also described the Scheme as a tax on consumers, as it could result in price increases on beverages to pay for the Scheme. These submissions questioned if there would be more public information on anticipated future cost increases, and if these would be capped.

## **Payment in arrears**

Several submissions put forward that Scheme payments should be made in arrears, rather than advance payments having to be made by suppliers especially at the start of the Scheme. It was suggested that this will ensure that invoices are based on actual redemption levels rather than forecasted redemption, and will avoid significant financial impositions, especially to small suppliers. It was also proposed that payments be fixed for as long as possible, and that small suppliers pay quarterly rather than monthly.

## First Supplier

The majority of submissions that referred to 'first supplier' proposed that the definition of supplier needs to be changed to be consistent with other jurisdictions. The Western Australia definition was pointed to by a number of respondents as being a suitable definition. It was suggested that the current definition is confusing, and will unnecessarily burden Tasmanian hotels, pubs, clubs, and bottle shops compared to other jurisdictions.

One submission supported the definition of supplier as it appears in the draft legislation, however they did not support that it appears in the legislation that only suppliers can seek container approvals, and this should be amended to allow others (such as producers) to obtain the container approval. A further point raised in the submissions was that the draft legislation does not include a definition or provision for exporters, and it was suggested that this may result in Tasmanian producers who export their products being charged twice.

## Refund type

Many submissions were keen to see that the 10c refund can be received by a variety of different mechanisms including cash, electronic fund transfer direct to bank account, donation direct to nominated charity, and retail vouchers. Some submissions stressed the importance of electronic banks payments, either to the consumer or their nominated charity, being available at any Refund Point.

*“There should be a mandated process or system for electronic bank payments so that refunds and donations are able to be made directly to all customers, community groups and charity groups from any Refund Point in Tasmania.”*

Submission from the Tasmanian Hospitality Association (template response)

Another submission stressed the importance of the full range of refund options being available at every Refund Point. The inclusion of retail vouchers was also encouraged, to allow retailers to 'opt in' to redeem vouchers.



# Survey Results

The public survey was completed by 3334 individuals during the five-week public consultation period. Details of the Survey can be found in Appendix I. Survey results indicated strong public support for the introduction of a Container Refund Scheme in Tasmania, with 98% of respondents reporting that they support the Scheme. There was also broad support for more action to reduce litter in Tasmania (99% of respondents) and many respondents reported that they pick up litter.

Respondents reported that they would return their containers to a range of Refund Point locations, with supermarkets being the most popular location reported. Respondents also indicated that they wished to receive their refund through a variety of methods, with cash and electronic payment the most popular options.

Survey results indicated broad support for the donation of refunds to charities, community groups and sporting groups, with 69% of respondents reporting they would consider donating their refund some of the time, and 19% reporting they would consider donating their refund all of the time. Additionally, 44% of respondents reported that they would donate their containers to a charity, community or sporting group to allow the charity or group to redeem the refund.

The survey also included a section for additional comments, which was completed by 1076 respondents. Most of these comments reflected general support for the Scheme and a desire to see it operating in Tasmania as soon as possible. Many respondents reported their experience with schemes interstate and internationally and urged Tasmania to follow existing models. Comments also indicated that Tasmanians want a Scheme that is accessible and easy to use, including Refund Points in regional areas and access for individuals with disability or mobility requirements. There was a general desire to see roadside litter reduced and more recycling, not just of drink containers. Some comments suggested that the Scheme should be extended or more action taken on other items such as single-use plastics.

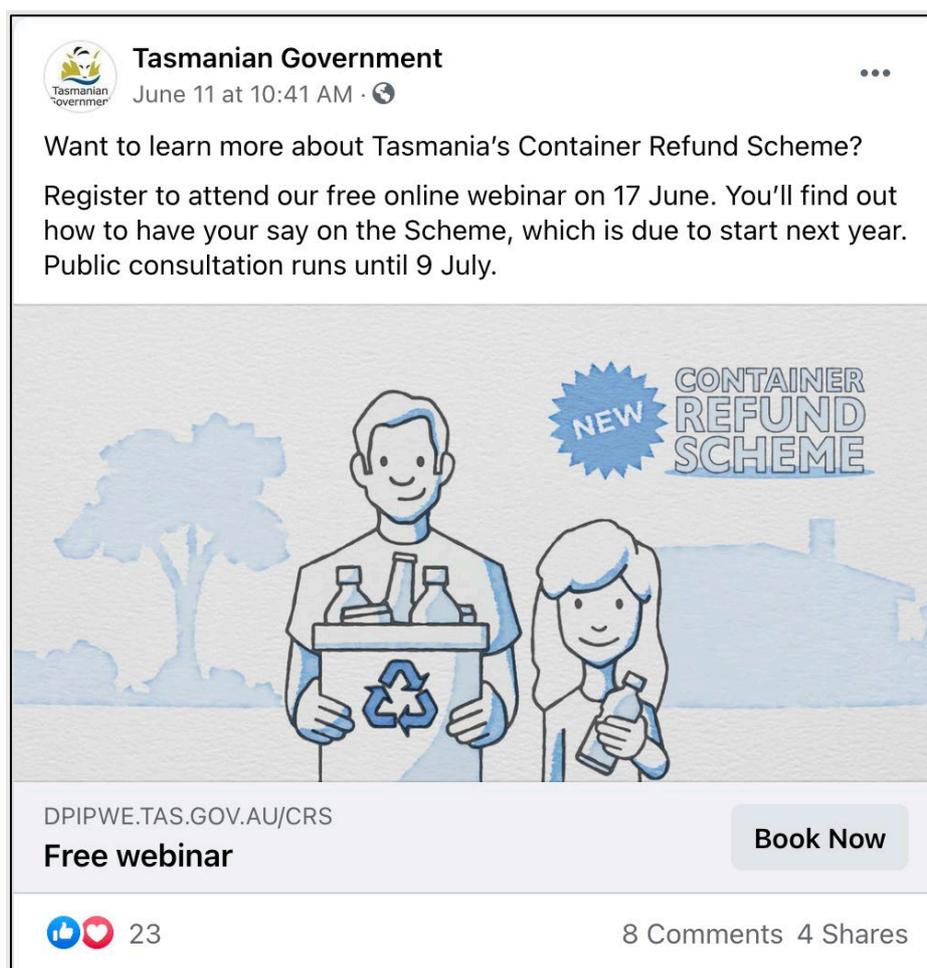
The comments also reported that the involvement of charities, community groups, and sporting clubs is important, and many people reported that they wanted to support their local charity or group through the Scheme.

Some respondents reported some concern about the price of beverages increasing and that this may offset the value gained from the refund. There was also some concern about the potential for 'bin raiding' and littering as a result. Out of 3334 responses, only 1% of respondents reported that they did not support the Scheme or had concerns about whether the Scheme would be effective as a measure to reduce litter and increase recycling.

# Webinar Results

As part of the suite of public consultation activities, five online webinars were conducted during the five-week period. These webinars were designed to reach the general public and specific stakeholder groups that were critical to the success of the Scheme. Across these five sessions, there were over 130 attendees who tuned in to learn more about the Container Refund Scheme and to ask questions.

The public webinar was held on 17 June 2021, and had 49 attendees. This webinar was advertised through our opt-in newsletter, the Container Refund Scheme webpage, and through a Facebook advertising campaign that reached over 70,000 Tasmanians.



The other webinars were focused on our targeted stakeholder groups – the local beverage industry, charities and community groups, and local government. These sessions contained a general overview of how the Container Refund Scheme is likely to work and information specific to the stakeholder group.

For charities and community groups, two sessions were held – one focused on an introduction to the Scheme, and the other was an information session with interstate presentations from Queensland, New South Wales, the ACT and Western Australia. This

second session gave community groups an opportunity to hear how community groups in other jurisdictions were involved in Container Refund Schemes.

The session for the local beverage industry was directed towards smaller producers to introduce the Scheme and to provide an opportunity to hear concerns and questions directly from the industry.

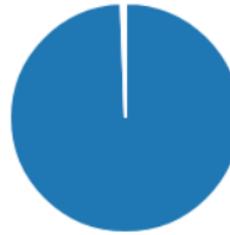
For the local government session, all elected members and General Managers were invited to attend, with the instruction for councils to invite any relevant council staff to attend. This was an introductory session, as well as an opportunity for the CRS project team to speak directly to parts of the Bill that would be relevant to councils, and for attendees to ask questions.

- Community Groups Introductory Webinar – 26 May 2021 – 16 attendees
- Community Groups Interstate Presenters Session – 16 June 2021 – 18 attendees
- General Public Webinar – 17 June 2021 – 49 attendees
- Local Beverage Introductory Webinar – 21 June 2021 – 5 attendees
- Local Government Introductory Webinar – 22 June 2021 – 51 attendees

# Appendix I – Survey Data

1. Would you like to see more action to reduce litter in Tasmania?

● Yes	3315
● No	8
● Unsure	11



2. Do you ever pick up litter?

💡 Insights

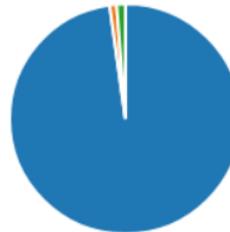
● Yes, often	1445
● Yes, sometimes	1758
● No	131



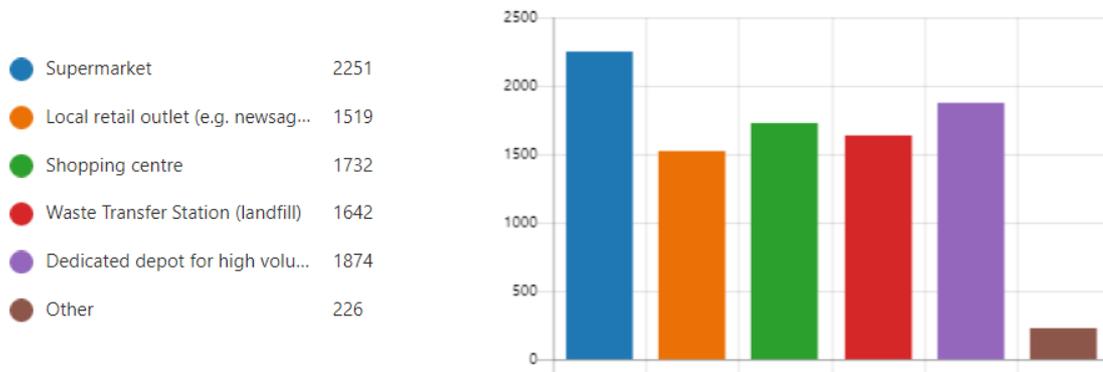
3. Do you support a Container Refund Scheme for Tasmania?

💡 Insights

● Yes	3261
● No	32
● Unsure	41

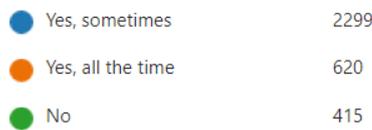


4. What locations would be the easiest to return eligible containers to?

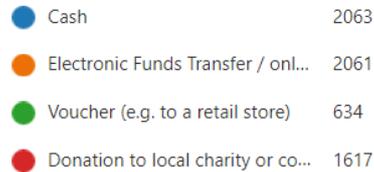


5. Would you consider donating your refund to a charity, community organisation, or sporting group?

💡 Insights



6. How would you like to receive your refund for drink containers?



7. Would you use a smartphone app or the internet to participate in the Scheme (for example, to receive or donate your refund)?

💡 Insights



8. How will you recycle your eligible drink containers once the Scheme starts?

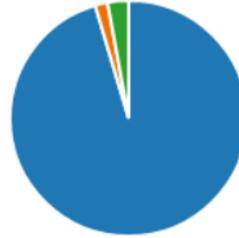
● Take containers to a Refund P...	3199
● Donate containers to charity, ...	1490
● Place containers in kerbside or...	607
● I will not recycle containers	9



9. Would you support extending the Scheme to other drink containers such as wine and spirit bottles?

💡 Insights

● Yes	3182
● No	57
● Unsure	95



# Definitions and Meanings

**Australian States:** South Australia, SA; Western Australia, WA, New South Wales, NSW; Queensland, QLD; Northern Territory, NT.

**Community Groups:** charities, not-for-profits, sporting clubs and community organisations

**Container Refund Scheme:** CRS; the Scheme

The draft ***Container Refund Scheme Bill 2021***: the Bill

**Department of Primary Industries, Parks, Water and Environment:** DPIPW

**Ministerial Advisory Group:** MAG

**External Reference Group:** ERG

**Material Recovery Facility:** MRF

**Network Operator:** responsible for the network of Refund Points in the Scheme

**Refund Point:** a location where beverage containers can be returned to as part of the Scheme.

**Refund Point Operator:** responsible for operating a Refund Point location/s where beverage containers can be returned as part of the Scheme

**Regulatory Impact Statement:** RIS; assesses any potential restrictions on competition, impacts on business, and general benefits and costs.

**Scheme Coordinator:** responsible for the administration and finance of the Scheme



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