



Ms Alison Playford  
Director General  
Transport Canberra and City Services Directorate  
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Email: [CDS.Expansion@act.gov.au](mailto:CDS.Expansion@act.gov.au)

22 August 2023

Dear Ms Playford

**Re: Container Deposit Scheme expansion**

The Waste Management and Resource Recovery Association of Australia (WMRR) appreciates the opportunity to provide comment on the ACT's proposal to expand the container deposit scheme. WMRR is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,000 members from over 500 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and NGOs. WMRR's members are also heavily involved in all jurisdictions that currently have refund schemes, performing the role of network operators, operating depots, administering Material Recovery Facilities (MRF) contracts, operating MRFs and operating remanufacturing facilities.

WMRR supports in principle, the proposed expansion in the scope of the containers to be included in the scheme, as we recognize that this ensures greater certainty for the community, as well as delivering an increased clean stream of recovered materials, ideally for remanufacturing back into beverage containers in Australia. WMRR has also been urging all state and territory governments to consider requiring containers registered under the respective schemes to include a percentage of Australian recycled content to drive circularity. Not only will this contribute to moving towards creating a circular economy, but it will also assist in reducing greenhouse gas emissions, energy demands and create additional local jobs and investment in Australia.

However, whilst WMRR notes the proposed list of containers, we cannot support the proposed inclusion of non-recyclable containers (liquid paperboard) in a scheme that is intended to maximise recycling, given that this material cannot be recycled at scale in Australia. WMRR believes that the inclusion of this material will cause confusion and undermine both the scheme and community confidence in it.

WMRR would also request that in implementing the increased scope of containers that there be a clear and agreed transition process developed, for the existing local government MRF contract that will be impacted by these changes, affecting the commercial position of both council and the MRF operator. WMRR is however confident that these issues can be satisfactorily resolved with the government.

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WMRR urges the government to also take the opportunity when increasing the scope to roll out a public education campaign to promote the current scheme along with future inclusions. Whilst the ACT may have a high total return rate, regrettably it has the lowest community return rate at 52% (WA has the second lowest at 75%) and the highest kerbside return rate at 48% (WA again has the second highest at 25%) of all jurisdictions in Australia. This has the real impact of ACT residents missing out on the financial benefits of returning their containers.

Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan  
**Chief Executive Officer**  
Waste Management and Resource Recovery Association of Australia