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26 November 2021

Dear Ms Mackey

**Re: Revised Draft Material Recovery Facility Processing Refund Protocol**

Thank you for the opportunity to provide feedback on the EPA's revised draft Material Recovery Facility (MRF) processing refund protocol.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body for all stakeholders in the essential waste and resource recovery (WARR) industry. We have more than 2,000 members across the nation, representing a broad range of business organisations, the three (3) tiers of government, universities, and NGOs. Our members are involved in a range of important waste management and resource recovery activities within the Australian economy including infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and community engagement and education.

WMRR commends the EPA for undertaking a review of the protocol and its aim to continuously improve both the methodology applied by the scheme coordinator to determine CDS refund amounts to MRFs, as well as the process MRF operators use to claim and receive these refunds.

The proposed changes to the protocol, which WMRR notes are largely administrative in nature, are supported as they would work towards reducing the administrative burden and costs for operators, while streamlining and removing red tape associated with the scheme. Of note is the EPA's proposal to remove the annual independent assurance reporting, as well as the elimination of duplicate reporting processes. WMRR agrees that due to the scheme maturing, there is now a greater ability to manage risks through the existing detailed reporting and mass balancing/audits.

WMRR had highlighted in 2017 that there was a risk the reporting and administrative requirements for MRFs would create an unreasonable additional burden on operations without adding any significant level of transparency or accountability. Thus, it is pleasing to see that the EPA, in its current review, has considered how to ease this burden.

WMRR believes that these changes will simplify the participation and obligations of MRFs while continuing to protect the integrity of the CDS, maximise legitimate returns to community, support equity between participants, and importantly, encourage greater efficiency of the protocol.

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WMRR looks forward to continued engagement with the EPA as it drives improvement of the NSW CDS, and particularly as other jurisdictions continue to work towards a level of national consistency with elements of container deposit/refund schemes across the country.

Please do not hesitate to contact the undersigned if you would like to further discuss WMRR's feedback.

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

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