

23 October 2017

Manager
Container Deposit Scheme
Department of Water and Environmental Regulation
Locked Bag 33
Cloisters Square WA 6850

Via email

RE – Submission to Western Australia Container Deposit Scheme – Discussion Paper

Dear Sir/Madam,

The Waste and Recycling Industry Association of Western Australia (WRIWA) is a recently formed association representing companies that have direct investment in the waste, recycling or composting sectors in WA. All WRIWA members commit to high professional and environmental standards.

WRIWA is an affiliate of the National Waste and Recycling Industry Council and has been invited to participate in the Waste Reform Agenda roundtable being convened by the Minister for Environment.

WRIWA members support the introduction of a Container Deposit Scheme (CDS) and wish to take part in the development of final policy positions and the development and review of the regulations and legislation underpinning this initiative.

We acknowledge the investigations of schemes in other States that has enabled the *Western Australia Container Deposit Scheme – Discussion Paper* to be presented. The following objectives for CDS underpin the submission from WRIWA;

- To ensure the CDS delivers maximum benefits to the environment from decreased littering and increased recycling,
- To keep cost imposts at a minimum using simple and expedient processes and technology, so that consumers are not disadvantaged, and,
- Maintain the viability of existing waste collection, processing and recycling investments made by WRIWA members. New regulations and policy introduced by government should always take into account existing contractual positions and the reasonable life cycle of private sector investments that have been made in good faith.

WRIWA makes the following submission by referencing two of the Consultation Points contained in the Discussion Paper.

Consultation Points 6 & 7 - Barcodes

WRIWA notes the requirement for barcodes to make possible the introduction of reverse vending machines. Any extension of barcode technology to the collection, sorting and verification of eligible containers from kerbside systems and MRF is not supported by WRIWA. The capital cost of implementing appropriate technology and the ongoing operating costs of barcoding in a MRF environment is prohibitive. An Estimation Methodology, as envisaged by Consultation Point 10 and commented on by WRIWA (below) is supported by WRIWA.

Consultation Point 10 - Kerbside Recycling

WRIWA suggests a regulated estimation method be utilised to determine the quantity of kerbside collected eligible containers and requests that it be given the opportunity to participate in its design.

The design of the estimation and/or eligibility verification method may require additional handling of containers. WRIWA therefore requests that the statement ***“Containers in kerbside recycling do not attract a handling fee as collectors are already being paid by the local government to collect the recycling”*** (p30 Western Australia Container Deposit Scheme - Discussion Paper) be withdrawn until the design of the estimation method is agreed.

I look forward to a very successful and positive relationship between the DWER and the Waste and Recycling Industry Association of Western Australia during the development of the policy, regulations and legislation to enable the successful and timely start up of Western Australia’s Container Deposit Scheme.

Yours sincerely,

John Lillywhite
Executive Officer - WRIWA