



Environment Institute  
of Australia and  
New Zealand Inc.

Manager, Container Deposit Scheme  
Department of Water and Environmental Regulation  
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CLOISTERS SQUARE WA 6850

Via email: [cds@dwer.wa.gov.au](mailto:cds@dwer.wa.gov.au)

Dear Sir / Madam

**Re: Feedback from EIANZ members on Western Australian Container Deposit Scheme.**

The Environment Institute of Australia and New Zealand (EIANZ) (the Institute) Western Australia (WA) Division (the Division) is pleased to have this opportunity to provide comments on environmental considerations related to the proposed container deposit scheme outlined in the discussion paper.

The Institute is the leading professional body in Australia and New Zealand for environmental practitioners, and promotes independent and interdisciplinary discourse on environmental issues. On all issues and all projects, the Institute advocates good practice environmental management delivered by competent and ethical environmental practitioners.

We forward this submission on behalf of the WA EIANZ members. The Division currently has approximately 140 members while the Institute has over 1400 members across Australia in a range of technical disciplines including certified environmental practitioners (CEnVP), ecological consultants, environmental advocates and environmental impact specialists working in government, industry and the community.

Again, we thank the Department of Water and Environmental Regulation for the opportunity to be engaged in its review of environmental considerations related to the proposed regulatory reform outlined in the Waste Reform Project.

Yours sincerely

Belinda Bastow  
President  
EIANZ – WA Division

# 1 Introduction

## 1.1 Background

The EIANZ WA Division is pleased to make comments on the potential introduction of a container deposit scheme in Western Australia to curb littering and promote recycling of single use beverage containers.

EIANZ considers that the maintenance and enhancement of environmental values is important to achieve a resilient and sustainable community. In addition, the EIANZ is supportive of the use of a broad suite of policy instruments to achieve the objective of environmental sustainability. However, it is also an important factor to ensure that the design and implementation of policy instruments, including legislative reform, has been well considered and addresses the element the Government is attempting to influence.

EIANZ have engaged practitioners and technical experts to provide valuable feedback on the discussion paper of the introduction of a container deposit scheme in Western Australia.

## 1.2 Role of the EIANZ

The EIANZ, as the leading membership based professional organisation for environmental practitioners in Australia and New Zealand, is an advocate for good practice environmental management. The Institute supports environmental practitioners and promotes independent and interdisciplinary discussion on environmental issues. The Institute also advocates environmental knowledge and awareness, advancing ethical and competent good practice environmental management.

A Certified Environmental Practitioner Scheme ([www.cenvp.org](http://www.cenvp.org)) is also in place to assess and certify competent experienced environmental practitioners working in government, industry and the community. This includes specialist competencies such as Impact Assessment, Ecology and Contaminated Lands.

The EIANZ is an advocate for environmental assessment, management and monitoring investigations and reports being certified by suitably qualified and experienced persons for the completeness and scientific rigor of the documents. One of the ways of recognising a suitably qualified practitioner is through their membership of, and certification by, an organisation that holds practitioners accountable to a code of ethics and professional conduct, such as the EIANZ.

The EIANZ is a **not-for-profit, charitable** organisation incorporated in Victoria, and a registerable Australian body under the Corporation Act 2001 (Cwlth), allowing it to operate in all Australian **jurisdictions**.

# 2 General Observations

In principle, the EIANZ is supportive of the need to have mechanisms to reduce litter and encourage recycling within Western Australia to improve environmental outcomes. The Institute is also supportive of consistent approaches across Australia for container deposit schemes where possible. However, the Institute acknowledges that due to the size and remoteness of many parts of Western Australia (WA), there may need to be some degree of differentiation in policy approaches where demographics and remoteness are factors.

## 2.1 Accessibility and operation of the collection network

The remoteness and size of WA communities and paucity of effective resource recovery operations available locally and the ability to link into these opportunities on the east coast of Australia can be cost prohibitive for resource recovery. Therefore, the development of a Container Deposit Scheme (CDS) should be mindful that its purpose is to facilitate the return of disposable beverage containers used away from home.

Container return depots should be convenient for both individual users and for groups. Previous schemes tied deposits to few and remote depots making the scheme difficult to find traction. Multiple, convenient drop off locations should be available across major metropolitan areas. In smaller regional communities, the drop off locations should be centralised and, if possible, automated/mechanised to encourage standalone drop off depots.

While cash refunds, on the spot, may be difficult to facilitate at all drop off locations, with the advent of greater number and cheaper development, electronic systems, including deposit cards or Q chip style scanners could provide opportunity to provide credit to linked bank accounts.

In remote locations where a number of collection points centralise through regional hubs to collect, sort, crush and are involved in activities to aggregate materials for efficient and economic bulk transportation should not be penalised by proposed changes to the Waste Avoidance and Resource Recovery (WARR) Act 2007, the WARR Levy Act 2007 and associated regulations where depots for the collection of waste are proposed to attract the landfill levy.

A levy on waste to landfill is an economic instrument proposed to divert waste from landfill, therefore applying the levy to activities related to recycling and the temporary storage of recycled materials should not be penalised and setting up a disincentive for recycling activities.

## **2.2 Refund options**

The Institute is supportive of the CDS allowing users to:

- Collect cash for containers returned
- Deposit refund to nominated bank account or reward card that can be separately linked to bank account securely
- Allow the refund to be provided to a nominated charity of the person's choice
- Be open to other opportunities to improve utilisation of the scheme in the future as new ideas arise

## **2.3 Verification schemes and administrative costs**

The Institute supports a simplified verification process that enables the correct distribution of refunds to parties involved and ensures little additional regulatory burden on participants. Utilisation of automated machines that can crush the container to avoid it recirculating and depositing to a card or Q reader process on a smart phone would present the least onerous system and least likely to be manipulated.

Effort should be made to ensure that potential to manipulate the system is discouraged. Where possible, auditing of the system should be undertaken to ensure that it is operating in accordance with system requirements and meeting the CDS objectives.

It may be more effective for beverage suppliers to pay to a central fund based upon products distributed to market for sale, refunds can be drawn from this fund on verification of returned beverage containers. This system would avoid necessity of collection points to identify the beverage supplier. Furthermore, the beverage supplier would be able to lodge for a refund for returned drink containers. With the South Australian scheme returning around 80 per cent of drink containers, the additional funds could be partly to pay for administrative burden of the scheme.

The potential for containers from other State jurisdictions being processed in Western Australia in large numbers is unlikely due to the remoteness of Western Australia to other populated areas in other Australian states. The Institute considers this to be of little concern to a Western Australian CDS and is overall more concerned with the promotion of recycling activities and the reduction of litter to protect the environment.