Public Submission

On Environment Protection (Beverage Container Deposit and Recovery Scheme) Bill 2009 for inquiry and report by 20 August 2009

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Preamble

Thank you for the opportunity to comment on this proposed Bill, it is very pleasing to see some of Keep Australia beautiful NSW points included in this Bill which was discussed at the Future of Australia's Waste Management Senate Standing Committee in 2008. Keep Australia Beautiful Council NSW has the following observations, points and comments in relation to the proposed Bill, all information contained in this submission only relate to the State of NSW and have been gathered from community groups, local government, businesses and individuals across NSW from the variety of programs which the organisations operates. These include grass roots environmental programs like Tidy Towns, Sustainable Cities, Clean Beach Challenge and our environmental education services.

Point One
Keep Australia Beautiful Council NSW (KABNSW) strongly believes in the waste management hierarchy which forms the basics of most waste management policies and systems. Within this Bill, there are a number of sections and subsections which either only refer to recycling or infer that recycling should be performed before reusing. KABNSW are of the opinion that reusing (evidences by the waste management hierarchy) should always come before recycling (avoid, reduce, reuse, recycle) and that recycling is the last step in the waste management hierarchy. Reusing materials or beverage containers is less resource intensive than recycling and should used more widely like it was only two decades ago with milk bottles.

References in the Bill include:

- 3, d – Reuse needs to be added
- 10, 1, h – reuse before recycle
- 10, 2, d – reusability before recyclability
- 10, 2, e – include reuse

Point Two
It is a very positive to see that as many types of beverage containers as possible are included in this proposed Bill. However if this Bill was successful then it would be very cost effective to also include all types of containers including domestic cleaners

and all types of food containers. This would equate to approximately two to three times as many containers carrying a deposit and result in two to three times as much recoverability, these figures might be underestimated. A deposit could also be placed on various types of cardboard and newspapers as well.

Point Three
Review of deposit amount in section 22, 2, c states that the deposit amount criteria is partly based on how well it reduces litter and litter related costs, however there is much evidence to suggest that littering behaviour is actually negatively effected by such deposits. This is because consumers can be swayed into believing that since they have been charged a deposit for the container, then they have a right to litter and leave it to someone else to clean it up. This supported in findings by the Keep Australia Beautiful National Litter Indexes. Containers carrying a deposit are uncommon in litter streams and this is largely due to individuals and community groups picking the containers up for fundraising.

Point Four
Container Deposits are largely proven to be successful models elsewhere; however it should be stated that this system also increases traffic as curb side pickups and deposit centre pickups require containers to be double handled.

Point Five
In the Bill in section 10 part 2, it states that financial support could be given to waste contractors or local government, however how much research has been undertaken on this point because it has the potential (at least in NSW) to costs a very sum of money. This is due to the following:

- Current long term contracts between waste managers and local governments may contain recoverability rates and in some cases councils may be legally bound to ensure waste contractors can collect agreed quantities of these higher value containers which may be marked for deposits.
- Converting current material recovery centres and other waste management centres to cope with a deposit system.
- The cost of implementing this system nationwide, this should include all administration, enforcement, support, advertising, education etc.

Perhaps a more comprehensive evaluation should be conducted to ascertain the exact costs of introducing this system and then balance these costs with the benefits of the deposit system as well as other techniques to recover the same quantity of recyclable material. If only a minor number of containers like soft drink and milk bottles became reusable then it is very likely that in the long term a very significant resource saving would be made, this may present a better cost for benefit than other options.