



Thank you for the opportunity for the community to give feedback on Victoria's container deposit scheme.

**1. Do you agree with the objectives of Victoria's container deposit scheme?**

Yes, in principle

**2. Do you have any comments on the objectives of Victoria's container deposit scheme?**

Supporting the circular economy, product stewardship, and best practice is something we support. And we're please that Victoria is taking this step, and hope that Victoria can become an innovative leader in this space.

**3. What do you see as the risks and benefits of each of these scheme administration options for Victoria?**

- A split responsibility model is the best way forwards, on the basis that the split proportionally takes into account a user & manufacturer accountability framework. Which may include obligations in addition to financial responsibility, such as promotion and community engagement programs.
- The Victorian Government provide regulatory oversight and ongoing evaluation of the scheme is an important element to mitigate risks with operations stakeholders and also to ensure compliance.
- A scheme coordinator with beverage industry involvement managing the scheme needs to be defined. The co-ordinator must be independent to the beverage industry, in that they aren't an advocate for the beverage industry, they are a service provider to the scheme.
- If the scheme coordinator is, or is seen as, an advocate or representative of the beverage industry, it is likely to be perceived by the public, that the beverage industry is controlling or influencing the operations of the CDS. While consultation with the beverage industry is important, it's well documented that there has been resistance of the beverage industry to implement a CDS in Victoria. So it's imperative that the scheme coordinator holds a neutral position, and acts as a facilitator of the process.

- While minimising costs is a fair and reasonable objective, if it is at the expense of integrity or transparency then it would be false economy. This should be taken into account when appointing an appropriate scheme coordinator.
- One or more network operator/s is appointed by the Victorian Government to manage a network of refund collection infrastructure

It is important to aim for “or more” to mitigate risks. If one network operator controls the CDS, there would be a risk to Victoria. Should a single operator collapse, it could jeopardise the scheme resulting in landfill. As has happened in the past with the collapse of SKM.

- A single network provider could also create a monopoly dictating standards or outcomes that may not be as good as they otherwise could have been.
- With multiple network providers, the risk would be mitigated, should a network provider no longer continue to operate. As, there would be other network providers capable of filling the void temporarily, or permanently, depending on the circumstances.
- It would also enable the Victorian government to compare standards, ensuring best practices and optimal outcomes.

#### **4. Is the proposed model the right one for Victoria**

Taking into account appropriate risk management strategies, on the surface it has the potential to be viable.

#### **5. What model of funding should Victoria’s CDS adopt?**

It’s unclear how the funding model will work in its entirety.

There will be a cost of 10c per beverage container added to the purchase cost, which will be refunded on returning the container.

It has not been specified how operational costs, will be covered. Will there be an additional, non-refundable amount also added to this levy? Or will this cost be offset by the funds acquired from the sale of the recovered material?

Without the disclosure of this information, an informed response can’t be given to this question.

#### **6. How should the float for the initial start-up of the scheme be designed?**

The float should be set up in advance by the beverage companies. If they aren’t in a position to fund this in advance, the government should provide an appropriate loan scheme.

#### **7. How do you think scheme participant responsibilities be set to promote achievement of scheme objectives?**

In addition to proposed model, the scheme regulator should report on the scheme performance to the public.

The scheme regulator should also set, and have the ability to adjust the levy fees.

The proposed responsibilities seem reasonable.

### **8. What is your view on the best way to promote convenience in a CDS?**

The easier it is to return beverage containers, the more that will be returned. However some people will prefer to dispose of in their kerbside recycling, especially if they consume the beverage in the home.

Community groups benefiting financially will provide significant community support and help to promote the CDS too.

### **9. How best can retailers engage with the proposed scheme?**

- Providing over the counter-drop off services
- Integrating Automated Reverse-Vending Machines (RVMs) on premises
- Utilising car-park space for separate depot area
- No engagement with scheme
- Other (please specify)

### **10. How can community organisations such as charities and sports clubs, best participate in Victoria's CDS?**

- By building and operating refund collection points themselves
- By hosting refund collection points that are built and operated by commercial recyclers
- By doing a bulk collection of containers to take to a local collection point
- By registering with the scheme as a nominated charity that is eligible to receive electronic funds donations through Automated Reverse Vending Machines
- Through mobile or 'pop-up' refund points as part of community fund-raising drives

### **11. Which types of location/s would you find the easiest to return eligible beverage containers to?**

Please select all that are relevant, and rank these from most preferred at the top to least preferred.

3. Supermarket
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1. Local retail outlet e.g. newsagency or convenience store
2. Shopping centre

4. Industrial/commercial area
5. Waste transfer station
6. Home pick up service (for fee)

12. How far do you normally travel for shopping, sporting, work or other regular activities?

- 5-10km

**13. What mix of refund collection point infrastructure will achieve the highest redemption rates?**

\Please select all that are relevant, and rank these from most preferred at the top to least preferred.

4 Automated Reverse Vending Machines (RVMs)

6 Large manual depots

5 Over the counter (OTC) refund collection points

2 Larger scale automated refund collection points

1 Bag drop facilities

3 Mobile or 'pop-up' refund points

**14. How would you like to receive your refunds for containers?**

Please select and rank your options with the most preferred at the top.

1. Cash
2. Electronic Funds Transfer (EFT) / online payment
3. Vouchers (e.g. to local stores)
4. Donations to local community organisations
5. Access to all refund options

Access to all options.

Then cash - let the kids get cash, there are life lessons in that

15. How can employment opportunities for Victorians be encouraged through the scheme?

- Direct employment via community-run refund collection points
- Employment and training partnerships with commercial recyclers
- Employment and training partnerships with beverage manufacturers
- All

**16. Do you support national consistency on the proposed refund amount of 10 cents?**

Yes

**17. Do you have any comments on the proposed refund amount of 10 cents?**

10 cents is on par with the rest of Australia, so it's practical to align with this

**18. Do you support Victoria's position on creating a national consistent refund mark to be used by all states and territories?**

Yes

**19. Do you have any comments on creating a nationally consistent refund mark to be used by all states and territories?**

A nationally compatible program is the best way forward

**20. Do you support containers included that are consistent with other states and territories and targeting those items that are commonly littered?**

Yes

Maybe

No (please explain why)

Victoria should take on the highest standards with accepting items that are commonly littered.

Straws are highly littered, and are directly associated with beverages, the scheme could include straws, which would prevent additional litter, by having them returned for the container refund

If we are to target highly littered items, then cigarette butts could be included in a future scheme – as this should be funded by the appropriate industry. We appreciate this is different element, but it's still litter. And no one seems to be talking about it.

The same could be said for chip packets. And if the model could be designed to incorporate other litter streams, in future, this would set Victoria up to be seen as an innovator thin this area.

**21. How can the Victorian Government best support material recovery facilities and councils to determine revenue sharing arrangements for beverage containers collected through the kerbside recycling system?**

That question is best derived via consultation with councils and MRF's

**22. What considerations should be given when planning for Victoria's CDS infrastructure?**

**23. What information or explanatory material will be most useful to help you/your business participate in Victoria's CDS?**

Education is vital – why are we doing this, what benefits will there be

What can and cannot be accepted in the scheme