

• Australian Conservation Foundation • Arid Lands Environment Centre • Clean Up Australia • Conservation Council of South Australia • Conservation Council of Western Australia • Environment Centre of the Northern Territory • Environment Tasmania • Environment Victoria • Friends of the Earth • Greenpeace Australia Pacific • Local Government & Shires Association of NSW • Mineral Policy Institute • NSW Nature Conservation Council • National Toxics Network • Queensland Conservation Council • Tasmanian Conservation Trust • Total Environment Centre

28 June 2010

Briefing Note to EPHC Ministers: Why a RIS into Container Deposits is Needed

Federal and state environment ministers (EPHC) meet on 5 July to decide if they will take the next formal and necessary step of a Regulatory Impact Statement (RIS) into a CDS. The RIS assesses the benefits and costs of a number of options including types of CDS and deposit levels; and is exhibited for public comment.

So far the EPHC has undertaken a number of studies which have delayed a decision to commission a RIS – further delay will **exacerbate significant public discontent** with the lack of progress.

We understand that the willingness to pay report by PWC found over **\$650m worth of environmental benefit and little or no inconvenience cost**. If this is applied to the BDA economic analysis, CD clearly becomes a **significant positive economic proposition** (taking account of all factors, unlike industry which quotes selectively). A RIS is the natural next stage particularly given the precedents set by the E-Waste RIS and superficial Packaging Covenant RIS.

Why it's time for a RIS

- Over the last decade there have been **five major studies**¹ – all of which show significant benefits from a CDS. There's been enough research – now it's time for a RIS to bring it all together to help answer the key questions being posed by supporters and opponents.
- Key bureaucracies keep suggesting **more time wasting studies** in order to delay a RIS. They should stop interfering – it's time for the public to have a say.
- A RIS with broad and appropriate terms of reference and independent management can **assess a full range of community, economic and environmental benefits and costs** – the most recent study by BDA which is before the EPHC has been found to understate the benefits and overstate the costs. It's time for a balanced approach.
- Repeated opinion polls show **the community clearly support a CDS**. By continuing to delay a decision, ministers and their governments are signalling they don't want action or a CDS while Australia continues to landfill over 6 billion beverage containers a year. It's time to increase recycling.
- A CDS in Australia will produce an **80% recycling rate of containers**; major reduction in litter; significant financial benefits to charities; up to 2,000 new jobs; and hundreds of convenient drop-off centres not only for containers but also for other problem wastes such as batteries and electronic items. It's time for a new green collection system that can be established by the private sector leaving government to regulate a CDS rather than invest in new infrastructure or impose a new tax.

Some companies in the beverage industry will no doubt be opposing a RIS – they don't want a balanced assessment or the community to be involved. They will repeat their previous tactic of refusing to support the Australian Packaging Covenant (APC). But they are required **by law** to sign the APC. And as revealed in the NPC review, the Packaging Covenant has done little to directly increase recycling – which has instead resulted from export materials demand and kerbside recovery systems - which are not linked or benefited by the Covenant.

¹ White Report to NSW Minister for Environment (NSW) 2001; West Australian Stakeholder Advisory Group to Minister for Environment 2007; Boomerang Alliance 2008; BDA Beverage Container Investigation to EPHC 2009; Hyder Report to Tas Environment Dept, 2009.