

Your Ref:

Container Deposit Scheme
Department of Water and Environmental Regulation
cds@dwer.wa.gov.au
CLOISTERS SQUARE WA 6850D

To Whom It May Concern,

**CONTAINER DEPOSIT SCHEME – CUSTOMER SERVICE STANDARDS –
CONSULTATION**

The Shire of Cuballing welcomes the proposed introduction of a Western Australian Container Deposit Scheme (CDS) and looks forward to involvement in the establishment and implementation of a successful scheme.

The Shire of Cuballing has reviewed the *Customer service standards for collection network* document and has concerns that the proposed standards generally provide for few refund points in smaller communities of the large area of the wheatbelt region.

The Shire of Cuballing has concerns are that:

1. Lack of consideration of total district/local government population

The *Draft customer service standards for collection network* ignores a considerable number of Local Governments by using population figures based on townsites, rather than the totality of the local government. Effectively local governments with a multiple small townsites or with residents who live outside a townsite receive less consideration for service under the CDS.

2. The lack of consideration of distance

The service standard of outer regional areas to provide a collection point within 100kms is too large. Travelling two hours to access a collection point is too great a distance and will generally discourage participation in the CDS.

Only 27 of the 42 local governments within the wheatbelt region are recognised in the report and flexible refund sites are only proposed for 23 wheatbelt local governments.

All communications to be addressed to: Chief Executive Officer, PO Box 13, CUBALLING WA 6311

OFFICE HOURS: Monday to Friday 8.30am to 4.30pm

Ph: 08 9883 6031, Fax: 08 9883 6174, Email: enquiries@cuballing.wa.gov.au

The *Customer service standards for collection network* document proposed two standards for establishing refund points, but the alternative option did not change the level of service within the wheatbelt region.

3. Alternative Collection arrangements suitable for smaller communities

The Shire of Cuballing believes that some type of agency arrangement where smaller collection sites could conduct collections in small communities should be able to be included in the CDS collection network.

Currently wheatbelt local governments provide comprehensive, if small scale, waste management facilities across the region. These facilities often include the management of recycling schemes including DrumMuster and waste oil.

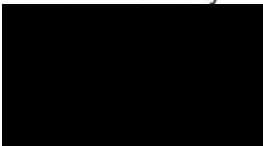
4. Lack of local refund points reducing impacting on use of CDS

Wheatbelt communities, with their extended lengths of roads contaminated by container waste, have been long time supporters of the implementation of a CDS scheme, primarily as a means to reduce this roadside litter.

The lack of local collection points could significantly reduce the positive impacts of the CDS in the wheatbelt. It is likely that the opportunity costs to collect, store and transport containers to a collection point distant from a persons residence will outweigh the financial return of participating in the CDS.

Should you have any queries regarding this matter, please don't hesitate to contact me.

Yours faithfully



Gary Sherry
CHIEF EXECUTIVE OFFICER

3rd December 2018