Western Australia
Container Deposit Scheme
Consultation summary
Disclaimer

Department of Water and Environmental Regulation
168 St Georges Terrace
Perth Western Australia 6000
Telephone +61 8 6364 7000
Facsimile +61 8 6364 7001
National Relay Service 13 36 77
www.dwer.wa.gov.au
© Government of Western Australia
May 2018

This work is copyright. You may download, display, print and reproduce this material in unaltered form only (retaining this notice) for your personal, non-commercial use or use within your organisation. Apart from any use as permitted under the Copyright Act 1968, all other rights are reserved. Requests and inquiries concerning reproduction and rights should be addressed to the Department of Water and Environmental Regulation.

For more information about this report, contact
Manager, Container Deposit Scheme via email: cds@dwer.wa.gov.au or telephone: (08) 6364 7000.

Disclaimer

This document has been published by the Department of Water and Environmental Regulation. Any representation, statement, opinion or advice expressed or implied in this publication is made in good faith and on the basis that the Department of Water and Environmental Regulation and its employees are not liable for any damage or loss whatsoever which may occur as a result of action taken or not taken, as the case may be in respect of any representation, statement, opinion or advice referred to herein. Professional advice should be obtained before applying the information contained in this document to particular circumstances.

This publication is available at our website or for those with special needs it can be made available in alternative formats such as audio, large print, or Braille
Introduction

The McGowan Government made an election commitment to implement a container deposit scheme (CDS) to reduce litter and increase recycling.

This report summarises the feedback received on the proposed CDS during the public consultation, which included the release of a discussion paper and an online survey.

One hundred and sixty five submissions were received and are published on the Department of Water and Environmental Regulation (DWER) website¹. Appendix A provides a list of submissions and a breakdown by sector.

The Government has established a CDS advisory group with representatives from the beverage, retail, waste and recycling industries and the local government, environment and community sectors. The CDS advisory group provides advice to inform the design and implementation of the CDS. The information received through the consultation process will be considered by the CDS advisory group and government through the scheme’s design and implementation.

¹ www.dwer.wa.gov.au/cds
Contents

Introduction ................................................................. 3
Online survey results ......................................................... 5
Container deposit scheme objectives ................................. 7
Agreed arrangements ...................................................... 8
  Scope of containers eligible for a refund ......................... 8
  Refund amount .............................................................. 8
  Refund mark .................................................................. 9
Scheme administration ................................................... 10
Scheme coordinator ......................................................... 11
Accessibility and operation of the collection network .......... 12
  Access and coverage ..................................................... 12
  Full cash value refund options ...................................... 13
  Other refund options .................................................... 14
  Recycling .................................................................... 14
  Community participation .............................................. 15
  Retail sector participation .......................................... 15
  Bulk container refund points ....................................... 16
  Verification .................................................................. 17
  Barcodes ..................................................................... 18
Scheme costs ................................................................. 19
  Impacts to small businesses .......................................... 19
  Handling fees ............................................................... 21
  Allocation of costs to beverage suppliers ....................... 21
Targets and measurement of performance ...................... 22
Interaction with kerbside recycling ................................ 23
Redemption of containers from other jurisdictions .......... 24
Implementation ............................................................. 25
Public awareness and education ..................................... 25
Glossary ....................................................................... 27
Appendix A – Submission list ........................................... 28
Appendix B – Online survey results ................................. 32
Online survey results

The online survey was completed by 3,256 people. Not all participants answered every question.

In summary, the responses were:

- **Do you support a CDS for Western Australia?**
  - The proposal to implement a CDS in Western Australia was supported by 97.1 per cent of the 3,236 people who responded to this question.

- **Which is the most important benefit of a CDS?**
  - The majority of respondents indicated that the protection of the environment is the most important benefit of a CDS, with some saying either reducing litter or increasing recycling is most important.

- **Where would you prefer to recycle your containers?**
  - More than half of respondents listed retail centres and a quarter indicated that they would prefer dedicated refund points.
Most respondents indicated that they would prefer to receive cash. Some respondents indicated that they would like to have the refund transferred to a charity or their bank account.

The most common responses were:

- online payment systems (such as PayPal, Android Pay or Apple Pay);
- cryptocurrency (such as bitcoin);
- credit to credit card, other card or utility bill (such as gas, water, rates, electricity and taxes);
- fuel or beverage discount voucher; and
- school Parents and Children funds.

The majority of respondents reported that they normally travel less than ten kilometres for shopping and sport.

Further detail is provided in Appendix B.
Container deposit scheme objectives

Written submissions received in response to the discussion paper generally supported the scheme’s stated objectives to reduce litter; protect the environment; support recycling; and provide opportunities for community participation.

Written submissions indicated that reducing litter was the most important objective while respondents to the online survey identified protecting the environment as paramount.

Response

There was broad support for the four objectives identified for the CDS. These objectives will guide its design.

It is intended that measurable targets will be identified to assess the scheme’s performance.
Agreed arrangements

The discussion paper identified three key features that the Government has decided to align with existing and proposed schemes in other Australian states and territories: the scope of containers to be eligible for a refund; the refund amount; and the refund mark.

Scope of containers eligible for a refund

Around 20 per cent of submissions commented on the scope of containers that should be eligible for a refund.

Some expressed support for the proposed alignment of the Western Australian CDS with those in other states and territories.

Others recommended that the scope of the containers be expanded, including for wine bottles.

Response

The decision to align the scope of containers eligible for the Western Australian CDS with the New South Wales and Queensland schemes will maximise national consistency.

Any future amendment to the scope of the containers eligible for a refund will be coordinated with other states and territories to maintain alignment between schemes.

Refund amount

Over half of the submissions commented on the proposed refund amount.

Some respondents considered that the refund amount should be higher because 10 cents may be too low to incentivise behaviour change while others supported the 10 cent deposit amount as it would be aligned to schemes in other jurisdictions.

Some submissions suggested that the refund amount should be different for different materials, with a higher deposit for glass materials due to broken glass presenting a hazard to cyclists and pedestrians.

A small number of submissions suggested that the refund amount should be reviewed after two years or if return rates fall below a specified threshold for consecutive years.
Response
The Government has decided that the refund amount will be 10 cents for each eligible container to align with other Australian schemes. This will minimise business administration costs and provide a common consumer experience across jurisdictions.

Any future amendment to the refund amount will be coordinated with other states and territories to maintain alignment between schemes.

Refund mark
Most submissions supported use of a nationally consistent refund mark to reduce confusion for consumers and minimise implementation costs for industry. A range of comments were made on the type of refund marks, including the wording, pictures, logos and the potential for embossment.

Beverage suppliers raised the timing of applying the refund mark to their beverage container labels, and indicated that 24 months’ notice would be required. It was also suggested that a nationally consistent refund mark should be agreed to by all states and territories as soon as possible so that suppliers could align changes with new ‘country of origin’ labelling requirements which come into effect on 1 July 2018.

The potential for customer confusion from variations in the scope of containers between states and territories (particularly containers less than 150 millilitres) was raised.

Response
The Government has decided to adopt the common refund mark agreed to by those states and territories with schemes. It will read:

10c refund at collection depots/points in participating State/Territory of purchase.

Beverages sold in containers less than 150 millilitres will not be eligible containers in the Western Australian, New South Wales or Queensland schemes.
Submissions addressing the scheme administration recommended that the role of Government should include setting targets, monitoring performance, conducting reviews and carrying out compliance and enforcement activities.

Some submissions noted the importance of ensuring that the regulatory costs of the scheme administrator are recovered from scheme funds.

Other submissions suggested that bodies such as the Waste Authority or the Keep Australia Beautiful Council WA should be the scheme administrator.

Response

The scheme administrator will be the department that assists the Minister responsible for administering the legislation that establishes the CDS.

It is expected that the Government (the Minister or the scheme administrator) will be responsible for:

- selecting and appointing the scheme coordinator;
- container approvals;
- enforcement;
- setting performance targets for the scheme coordinator;
- monitoring performance of the scheme coordinator; and
- reviewing the scheme.

One of the considerations in designing CDS will be minimising the costs of the scheme administrator and recovering these costs through the scheme to ensure the scheme is sustainably funded.
Scheme coordinator

Only nine submissions commented on the structure of the scheme coordinator role.

The majority supported using a product responsibility organisation (PRO) model similar to the approach adopted in Queensland. Under this model, the PRO is controlled by a board with representation from relevant sectors.

There was support for a single scheme coordinator rather than the multiple scheme coordinator models of South Australia and the Northern Territory.

Submissions commented that companies involved in the scheme coordinator role should not be able to unfairly use the information acquired through the CDS or the coordinator’s cost allocation role.

Submissions also emphasised the importance of transparency, particularly regarding financial information.

Other management controls suggested for the scheme coordinator included:

- coordinator targets to match scheme objectives;
- coordinator to report regularly and publicly;
- coordinator to be subject to periodic audit by the scheme administrator; and
- targets to be clear and measurable.

Response

The Government, with advice from the CDS advisory group, has considered the schemes developed in other Australian jurisdictions.

The scheme will have a single scheme coordinator which will provide greater accountability and is less complex.

Details of the scheme coordinator role, including how potential conflicts of interest will be managed, will be developed in consultation with the CDS advisory group.

A high level of transparency through publicly available performance targets and public reporting is supported, and will be part of the scheme’s design.
Accessibility and operation of the collection network

Access and coverage

Consultation point 1

What would be reasonable access for metropolitan, regional and remote areas of the State to balance convenience and cost? Are there any considerations you believe should be included in deciding this?

Many submissions highlighted the challenges of defining reasonable access in metropolitan, regional and remote areas. The size, remoteness and diversity of Western Australia adds complexity to designing a network of refund points across the state.

Submissions suggested that coverage and access metrics for refund points could be based on population size and distance travelled.

Equitable access for all consumers was considered important, especially in regional and remote areas. Submissions suggested including special considerations for mining camps and facilitating access around shift work.

Submissions also recommended that further consultation was necessary to determine tailored solutions for regional and remote areas, such as locations and hours of operation for centralised refund points, service schedules for mobile refund points and/or utilising existing outreach services.

Response

Appropriate access and coverage is important to the level of community participation in the scheme and the return rates for beverage containers. There will likely be a tiered approach to refund point access from metropolitan centres (with large, dense populations) through to remote communities (with smaller, more widely distributed populations).

Access and coverage targets will need to be developed with consideration of Western Australia’s size and diversity, and the cost of service delivery. Analysis of geographic and demographic (population) data will be undertaken to assist in determining targets that are appropriate for different areas of Western Australia.
Full cash value refund options

Consultation point 2: What full cash value refund options should be considered?

Submissions supported a range of full cash value refund options at refund points including cash payment, vouchers redeemable for cash, and payments via electronic means (for example, bank transfers).

The majority of respondents to the online survey ranked cash as the preferred refund option. However, there were concerns about the vandalism risk and security of reverse vending machines holding cash.

Several submissions suggested that refunds should be made by electronic funds transfer, potentially with a minimum placed on the number of container returns required before an electronic payment is made.

Submissions noted the importance of designing the collection network to ensure that there is appropriate access to cash value refund options.

Response

It is reasonable to expect that refund points will provide at least one full cash value refund option, such as cash payment, vouchers redeemable for cash, and payments via electronic means.

Requiring payments above a specified level to be made by bank transfer will ensure an accurate record and minimise potential fraud.
Other refund options

Consultation point 3

What other refund options should refund points consider offering?

Submissions supported a range of refund options (in addition to full cash refunds) including transfers to charity; shopping vouchers; loyalty program points; Smart Rider card top-ups; payment to cashless welfare cards; and payment via smartphone applications.

Response

It is preferable that the legislation for the scheme does not unnecessarily restrict the range of options that refund points could consider to help to attract customers. It is noted that some refund options may be constrained by existing State or Commonwealth laws.

Recycling

Fifty two submissions commented on kerbside collection, recycling objectives and outcomes, and performance measurement. A significant number of these submissions were concerned with the identification and development of markets for collected materials and how best to ensure containers collected are recycled.

Response

It is intended that it will be an offence to dispose of beverage containers for which refunds have been paid to landfill. This is consistent with the legislative approach in New South Wales and Queensland.

The CDS provides an opportunity to develop Western Australia’s recycling capability to support the McGowan Government’s vision of making Western Australia a sustainable low-waste society in which human health and the environment are valued and protected.

The materials produced by container deposit schemes are more valuable because they are less contaminated. Consistent streams of high quality recyclable materials are expected to provide opportunities for these industries to develop in Australia.
Community participation

Some submissions considered that the CDS provides an opportunity for charities, community groups, schools and individuals to clean up litter and raise money.

The promotion of the CDS in schools, and possibly locating donation points or reverse vending machines at schools, was seen to be worthwhile.

Response

The importance of community participation is acknowledged and is one of the objectives of the Western Australian CDS.

Community groups and charities will be encouraged to participate in the CDS. There are various ways such groups can be involved such as running donation points, refund points and organising litter clean up initiatives. Further consultation with the peak bodies representing these organisations will occur during the CDS’s design and implementation.

Donation points will not receive handling fees. Some groups in South Australia (notably Scouts South Australia) operate refund points (in addition to donation points), which allows them to receive handling fees on donated containers.

Retail sector participation

Consultation point 4

What options are there for the retail sector to participate in the scheme?

There were 35 submissions addressing the potential involvement of the retail sector in the scheme.

Some argued that the participation of the retail sector is key to the scheme’s success and recommended that the scheme establishes an obligation on beverage retailers to accept container returns. Others were of the view that the participation of the retail sector should not be compulsory.

Response

Western Australia intends that the retail sector’s participation as refund points will be voluntary, consistent with the existing and proposed schemes in Australia.

Retail outlets will be encouraged to provide their customers with information on the scheme and nearby refund locations. Retail outlets are also encouraged to consider offering refund point locations. The scheme coordinator will also have a role in promoting and providing information on the scheme.
Bulk container refund points

Consultation point 5  What features are important for commercial container deposit points?

Submissions identified that commercial container refund points should be in convenient locations; accessible to commercial entities as well as charities, community organisations and the public; accept containers made of a variety of materials; and meet local government, planning, environmental and other regulatory requirements.

Submissions suggested that co-locating commercial, or bulk, refund points with existing facilities such as material recovery facilities or resource recovery parks could reduce handling and scheme costs.

Most submissions supported bulk container refund points accepting multiple streams of container materials to increase customer convenience, support best practice operations and to reduce handling costs.

Response

It is recognised that the infrastructure and operational requirements for refund points to efficiently manage bulk quantities of containers are likely to differ from those for household quantities.

New South Wales uses automated depots for bulk container returns of 500 or more containers of all eligible material types. This service is open to the public and commercial operations.
Verification

Consultation point 6

What advantages and concerns do you see for the verification approaches described above? Are there alternative approaches that should be considered?

Submissions noted that verification by container weight is appropriate for homogenous containers such as aluminium cans, but not for containers that range in size such as PET (one tonne of PET can contain between 29,200 to 48,300 bottles) and that weight based verification is prone to fraud and discrepancies as contaminants or rain can affect weight. It was acknowledged that average weight counts may be needed for remote collectors.

Some submissions commented that automated high speed counting verification is a valid approach for refund points that handle a high volume of containers. Bar code reading was supported where containers are crushed and deposits are made electronically, however, it was considered that existing material recovery facilities should not be required to install barcode readers or automated counters.

The compaction of redeemed containers to reduce fraud was supported by some, and others suggested that a risk based approach should be taken for smaller volumes, particularly in regional or remote areas.

Response

The use of barcode scanning technology to accurately account for containers returned and to retire containers as soon as possible is being investigated. The limitations of barcode scanning technology are also acknowledged.

There will be further consideration of verification method/s appropriate in various contexts, and monitoring and auditing requirements.
Barcodes

Consultation point 7

Should containers be required to have a barcode to be approved for sale under the scheme?

It was reported that 97.3 per cent of eligible scheme containers already have a barcode for point-of-sale purchase because retailers require them although they may not be present on individual containers sold in multi-packs.

A significant number of submissions supported the mandatory use of barcodes for all eligible containers consistent with the New South Wales and Queensland schemes.

It was recommended that there be flexibility to allow old, distorted, crushed or damaged containers with unreadable barcodes to be returned to support the scheme’s objectives of reducing litter and increasing recycling.

The submissions noted that the product labelling requirements of government have financial impacts and timing implications for industry.

The Northern Territory Government’s submission noted that the costs associated with barcode technology at return points may not be viable for small and remote return points.

Response

It is proposed that barcodes will be required on all eligible containers supplied in Western Australia.

There will be further consideration before a decision is made about barcode requirements at the point of return.
About 20 per cent of submissions commented on scheme costs.

The majority considered that it was important for consumers to be aware that scheme costs (deposit amount, handling fees and administration costs) are likely to be passed on by beverage manufacturers and retailers. Some submissions suggested that retail prices should be monitored to prevent companies passing on costs.

Several submissions recommended that beverage manufacturers and suppliers should be responsible for all costs associated with the CDS, and emphasised the importance of a sustainable model that keeps costs low and is efficient.

**Response**

Beverage manufacturers and suppliers will be responsible for funding the CDS. It is recognised that beverage manufacturers and suppliers will pass some of these costs to retailers, who in turn will transfer some costs onto consumers. Communication and education prior to the scheme’s commencement will be necessary to clarify this.

While it is expected retailers will increase prices to address costs associated with the CDS, raising prices excessively and claiming that these increases are due to the CDS is not permitted under consumer protection legislation.

**Impacts to small businesses**

A small number of submissions commented about the potential impact of the CDS on small business.

There was concern that the increase in beverage prices could cause consumers to move away from small businesses such as convenience stores to major supermarket chains where prices may be lower.

**Response**

It is acknowledged that smaller beverage suppliers generally have narrow profit margins and may not have the ability to pay working capital to the scheme in advance.

The scheme’s impact on small businesses will be carefully managed.
Handling fees

Consultation point 8
How should handling fees be determined?

The majority of submissions that commented on handling fees considered that they should be set through a competitive process, within a cap to be set by the scheme coordinator or administrator.

It was noted that there could be significant variation in handling fees between metropolitan, regional and remote areas, due to differing transport costs and quantities of containers returned. Some submissions suggested that handling fees should be set by region or material type.

Response
A competitive process to determine handling fees with a cap set by the scheme coordinator is likely to minimise scheme costs across metropolitan, regional and remote areas. It is expected that handling fees will vary by container type, reflecting the value of the recyclable material to the scheme coordinator.

It is intended that handling fees will be published to provide transparency and confidence in the scheme’s management. This will also give potential refund point operators information upon which to base investment decisions.

Allocation of costs to beverage suppliers

Consultation point 9
How should costs be allocated to beverage suppliers?

There was general support for the use of barcode technology to track movements of containers and allocate costs to suppliers. The Northern Territory advised that associated costs may not be viable for small or remote collection depots.

Some submissions supported the use of state-wide sales data to allocate costs to suppliers while others supported the use of regional sales data.

Response
Allocating costs by barcode would be the most accurate and fairest approach. There will need to be a way for allocating costs if barcodes are not readable.

Allocating costs according to sales data is the preferred approach. Obtaining regional sales data may be difficult.
Submissions commented on the need for data to be collected before and after the scheme commences to allow evaluation of the scheme.

There was strong support for state-wide and regional targets for access and coverage and a number of submissions suggested that the percentage of containers that are returned should be measured and reported on both a state-wide and a regional basis.

Some submissions suggested that in addition to return rates, the scheme’s costs, and the direct and indirect employment it creates should also be measured and reported.

Submissions supported providing opportunities for charities and community groups to operate donation and refund points.

Respondents recognised the challenges of the size and remoteness of Western Australia but considered it is important to provide access to the scheme across the state. It was suggested that access targets could vary based on geographical location but it would be preferable that consumers did not have to travel more than 15 kilometres in the metropolitan region or 40 kilometres in regional areas to reach a refund point.

Response
The regulations will establish key performance targets, such as state-wide return rate and refund point coverage, to make the scheme coordinator accountable for delivering an equitable scheme which delivers the expected outcomes.

Additional performance measures, potentially including cost, the impact on littering rates, recycling rates and community participation, will be developed and reported to allow the scheme to be assessed against its objectives.

Consideration will be given to how best to report on performance in metropolitan and regional areas.
How should the number of eligible containers in kerbside recycling be determined? Who should be responsible for ensuring that periodic audits of any estimation methodologies are conducted?

Submissions generally indicated that the scheme should be complementary to kerbside operations and that there was a need to maintain a competitive market for material recovery facilities.

Some commented that the removal of CDS containers from kerbside bins could reduce the revenue that material recovery facilities make from selling recovered materials.

Others suggested that containers collected through kerbside recycling should not be eligible for refunds because those are not littered and the materials are already being recovered, in line with the scheme’s objectives.

Respondents from the waste management sector and local government considered that they should share any financial benefits from the introduction of the CDS.

There were different views on how best to reach agreement on revenue sharing between material recovery facilities and local governments. Some suggested that contract negotiations should be left to the respective parties and others suggested this should be regulated.

Submissions generally supported the development of an audit and estimation protocol for CDS container processing at material recovery facilities. There was a view that audits of CDS glass containers would need to take place kerbside to overcome breakages from transport and compaction while audits of other CDS materials (such as PET, HDPE and aluminium) could be conducted at the material recovery facility.

Some submissions suggested that the scheme coordinator should be responsible for the cost of audit and estimation of CDS containers while others thought that beverage suppliers or material recovery facilities and local governments should be responsible.

It was suggested that bottle crushing operators should be included in the definition of material recovery facilities. That would allow hotels and other commercial operators to use an estimation protocol to collect container refunds without the need for additional equipment or processes.

Response

It is intended that the CDS is complementary to existing kerbside services and not unreasonably impact their financial viability. It is intended that material recovery facilities will be eligible to claim refunds on the containers they collect which will offset the reduction in the volume of recyclable containers entering material recovery facilities.

Further consideration will be given to the most appropriate way to facilitate refund revenue sharing between local government and material recovery facilities.

A methodology will be developed to allow for the estimation and audit of the number of eligible containers in kerbside recycling. The costs arising from that protocol should be shared by the beneficiaries (local government and material recovery facilities).
Should Western Australia permit redemption of scheme containers from other participating states and territories?

A number of submissions supported Western Australia taking a collaborative approach with other states and territories in relation to cross-border acceptance of containers.

Some considered that containers from other states and territories with container deposit schemes should be able to be accepted in Western Australia and some said that reciprocal arrangements should only be put in place when all jurisdictions have schemes.

Several submissions recommended that the Indian Ocean Territories (Christmas Island and the Cocos (Keeling) Islands) should be included in the scheme.

Response

The redemption of scheme containers from other participating states and territories will be considered further including with other jurisdictions as the scheme is developed.

Further consideration is required to determine whether the Indian Ocean Territories will be included in the scheme.
Implementation

Some submissions requested that the CDS start as soon as possible to ensure that there are minimal chances of the scheme being withdrawn. Others suggested that the implementation date be delayed so that the scheme does not commence over the Christmas/New Year period.

A number of submissions suggested that there should be an 18 month period between the finalisation of the design and commencement of the scheme. It was suggested that this would allow the retail manufacturing industries to make the necessary arrangements.

Some respondents recommended a transition period during which eligible containers without a refund mark or barcode could be returned. It was considered that this would reduce litter and provide consumers time to return such containers.

Response

To ensure adequate time between the finalisation of the design and the commencement of the scheme as raised by industry and retail sector, the Western Australian Government has decided to delay the commencement of the scheme to 2020.

The need for a transition period will be considered as the scheme design is finalised.

Public awareness and education

The importance of effective and consistent education and messages to industry and community was considered to be important to the scheme’s success. This matter was also raised during briefings and discussions with stakeholders.

Some submissions suggested that the scheme administrator should be responsible for marketing, communication and education programs, with the administrator providing oversight of the key messages and branding.

Response

There are clear benefits in delivering a communication strategy which provides consistent and reliable information to the community and scheme participants.

Responsibility for the initial promotion of the scheme is likely to be shared. It is proposed that the scheme coordinator will have a role in ongoing marketing, communication and education about the scheme.
## Glossary

<table>
<thead>
<tr>
<th>Terms</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrator / scheme administrator</td>
<td>The Government department responsible for administering the scheme, expected to be the Department of Water and Environmental Regulation.</td>
</tr>
<tr>
<td>CDS</td>
<td>Container deposit scheme.</td>
</tr>
<tr>
<td>Coordinator / scheme coordinator</td>
<td>The entity that manages the scheme’s operation, pays refund points for their recycled containers and billing beverage suppliers.</td>
</tr>
<tr>
<td>Eligible container</td>
<td>Beverage container between 150 millilitres and three litres not excluded from the scheme.</td>
</tr>
<tr>
<td>Handling fee</td>
<td>The per container fee the refund point earns for handling a returned container.</td>
</tr>
<tr>
<td>HDPE</td>
<td>High density polyethylene – cloudy plastic such as used for milk bottles.</td>
</tr>
<tr>
<td>MRF</td>
<td>Material recovery facility – for sorting recyclable material from waste.</td>
</tr>
<tr>
<td>PET</td>
<td>Polyethylene terephthalate – clear plastic such as used for water bottles.</td>
</tr>
<tr>
<td>PRO</td>
<td>Product responsibility organisation – A model for the coordinator function where producers take responsibility for meeting scheme targets. A PRO is proposed for Queensland.</td>
</tr>
<tr>
<td>Refund mark</td>
<td>An indication on a container (usually on the label) showing it can be returned for refund of the 10c deposit.</td>
</tr>
<tr>
<td>Refund point</td>
<td>A place consumers can take containers to get a refund. Can be a reverse vending machine.</td>
</tr>
</tbody>
</table>
Appendix A – Submission list

The names of the people and organisations that made written submissions are listed below. The submissions are available on the Department of Water and Environmental Regulation’s website at [www.dwer.wa.gov.au/cds](http://www.dwer.wa.gov.au/cds).

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abbott, Jane</td>
<td>Albany Community Environment Centre Inc.</td>
</tr>
<tr>
<td>Alexander, Ken</td>
<td></td>
</tr>
<tr>
<td>Allan, Rosemary</td>
<td></td>
</tr>
<tr>
<td>Allen, Bob</td>
<td></td>
</tr>
<tr>
<td>Allen, Doug</td>
<td></td>
</tr>
<tr>
<td>Alliance for a Clean Environment</td>
<td></td>
</tr>
<tr>
<td>Armstrong, Bevan</td>
<td></td>
</tr>
<tr>
<td>Australian Beverages Council</td>
<td></td>
</tr>
<tr>
<td>Australian Food and Grocery Council</td>
<td></td>
</tr>
<tr>
<td>Australian Hotels Association WA</td>
<td></td>
</tr>
<tr>
<td>Australasian Association of Convenience Stores</td>
<td></td>
</tr>
<tr>
<td>Baws, Graham</td>
<td></td>
</tr>
<tr>
<td>Beeliar Group - Professors for Environmental Responsibility</td>
<td></td>
</tr>
<tr>
<td>Bhinda, Rajni</td>
<td></td>
</tr>
<tr>
<td>Blyth, Cameron</td>
<td></td>
</tr>
<tr>
<td>Boomerang Alliance</td>
<td></td>
</tr>
<tr>
<td>Bottlecycler Australia</td>
<td></td>
</tr>
<tr>
<td>Bowd, Michael</td>
<td></td>
</tr>
<tr>
<td>Bowman, Bruce</td>
<td></td>
</tr>
<tr>
<td>Bulbeck, Chilla</td>
<td></td>
</tr>
<tr>
<td>Burgess, Lyle A</td>
<td></td>
</tr>
<tr>
<td>Burstein, David</td>
<td></td>
</tr>
<tr>
<td>Cairns, Robert</td>
<td></td>
</tr>
<tr>
<td>Cape Conservation Group Inc.</td>
<td></td>
</tr>
<tr>
<td>Care for Hedland Environmental Association</td>
<td></td>
</tr>
<tr>
<td>Chapple, Robin</td>
<td></td>
</tr>
<tr>
<td>Chapple, Rory Jay</td>
<td></td>
</tr>
<tr>
<td>City of Bayswater</td>
<td></td>
</tr>
<tr>
<td>City of Canning</td>
<td></td>
</tr>
<tr>
<td>City of Fremantle</td>
<td></td>
</tr>
<tr>
<td>City of Rockingham</td>
<td></td>
</tr>
<tr>
<td>City of Swan</td>
<td></td>
</tr>
<tr>
<td>Coca-Cola Amatil</td>
<td></td>
</tr>
<tr>
<td>Coles</td>
<td></td>
</tr>
<tr>
<td>Consumers’ Association of WA</td>
<td></td>
</tr>
<tr>
<td>Container Deposit System Operators</td>
<td></td>
</tr>
<tr>
<td>Cooper, Wendy</td>
<td></td>
</tr>
<tr>
<td>Crombie, Donald</td>
<td></td>
</tr>
<tr>
<td>Cyclists’ Action Group</td>
<td></td>
</tr>
<tr>
<td>D’Angelo, M</td>
<td></td>
</tr>
<tr>
<td>Davies, Peg</td>
<td></td>
</tr>
<tr>
<td>Davis, Peter</td>
<td></td>
</tr>
<tr>
<td>De Leo, Michael</td>
<td></td>
</tr>
<tr>
<td>Dyson, Robyn</td>
<td></td>
</tr>
<tr>
<td>Eastern Metropolitan Regional Council</td>
<td></td>
</tr>
<tr>
<td>Environment House</td>
<td></td>
</tr>
<tr>
<td>Environment Institute of Australia and New Zealand (WA Division)</td>
<td></td>
</tr>
<tr>
<td>Fitch, Denise</td>
<td></td>
</tr>
<tr>
<td>Fleeton, Brent</td>
<td></td>
</tr>
<tr>
<td>Gibson, David</td>
<td></td>
</tr>
<tr>
<td>Glover, Bruce</td>
<td></td>
</tr>
<tr>
<td>GS1 Australia</td>
<td></td>
</tr>
<tr>
<td>Gunasekera, Udeni</td>
<td></td>
</tr>
<tr>
<td>Hamilton, Tony</td>
<td></td>
</tr>
<tr>
<td>Harper, Dennis</td>
<td></td>
</tr>
<tr>
<td>Hayes, John</td>
<td></td>
</tr>
<tr>
<td>Hemsley, Lee</td>
<td></td>
</tr>
<tr>
<td>Henley, Colin M</td>
<td></td>
</tr>
<tr>
<td>Heyhoe, Phil</td>
<td></td>
</tr>
<tr>
<td>Hodder, Frank</td>
<td>Muller, Yvonne</td>
</tr>
<tr>
<td>---------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Hooper, Moira</td>
<td>Mumme, James</td>
</tr>
<tr>
<td>Independent Brewers Association</td>
<td>Napier, Steve</td>
</tr>
<tr>
<td>Ingram, Colin</td>
<td>National Retail Association</td>
</tr>
<tr>
<td>Iremonger, Warren</td>
<td>Northern Territory Government (Department of Environment and Natural Resources)</td>
</tr>
<tr>
<td>Johnston, Craig</td>
<td>Olsen, Grant</td>
</tr>
<tr>
<td>Jones, Christopher</td>
<td>Ottaway, Steve</td>
</tr>
<tr>
<td>Jones, Francesca and Pettit, Anne</td>
<td>Over 55 Cycling Club</td>
</tr>
<tr>
<td>Keep Australia Beautiful Council WA</td>
<td>Paolino, Sam</td>
</tr>
<tr>
<td>Lang, Adrian</td>
<td>Patullo, Sandra</td>
</tr>
<tr>
<td>Lawson, John Charles</td>
<td>Pettit, Anne</td>
</tr>
<tr>
<td>Le Tessier, Martin</td>
<td>Phillips, Richard</td>
</tr>
<tr>
<td>Liquor Stores Association of WA</td>
<td>Pilbara Regional Council</td>
</tr>
<tr>
<td>Loring, Paul</td>
<td>Pollution Action Network</td>
</tr>
<tr>
<td>Lower Great Southern Alliance of Councils</td>
<td>Pomfret, Charmain</td>
</tr>
<tr>
<td>Lyons, Arthur</td>
<td>Raisa, Perry</td>
</tr>
<tr>
<td>Man, D</td>
<td>Re.Group</td>
</tr>
<tr>
<td>Marra Worra Worra Aboriginal Corporation</td>
<td>Read, Jan</td>
</tr>
<tr>
<td>McAuliffe, Brian</td>
<td>Richards, Vicki</td>
</tr>
<tr>
<td>Melville, Don</td>
<td>Robinson, Bruce</td>
</tr>
<tr>
<td>Metcash Limited</td>
<td>Scanlan, Ray</td>
</tr>
<tr>
<td>Miles, Robert</td>
<td>Scanlan, Shirlene</td>
</tr>
<tr>
<td>Mitchell, Peter</td>
<td></td>
</tr>
</tbody>
</table>
Scouts SA
Scouts WA
Shaw, Rod
Shire of Bridgetown-Greenbushes
Shire of Mundaring
Shire of Toodyay
Shire of Wagin
Shopping Centre Council of Australia
Sims Metal Management
Slessar, Michael
Small, George
Smith, Brian L
Smith, Joh
South Australia Environment Protection Authority
Southern Metropolitan Regional Council
Suez Recycling and Recovery Australia
Tangaroa Blue Foundation
Taylor, David
Taylor, Nev
ten Bokkel, Gerard
Thomas, Gary
Toodyay Naturalists’ Club Inc
Uyen, John and Anna
Various school students
Walker, Steve
Walsh, Phillip
Waste and Recycling Industry Association of Western Australia
Waste Authority
Waste Management Association of Australia
Watts, Howard
Western Australian Brewers Association
Western Australian Local Government Association
Western Metropolitan Regional Council
Winemakers’ Federation of Australia
Woolworths Group
Yeats, John
Zambotti, Darianne
The breakdown of submissions by industry type and by geographical distribution is shown in Tables 1 and 2.

**Figure 1: Submissions by industry type**

- Individual: 107
- Local government: 15
- Environment: 11
- Retail: 9
- Waste: 7
- Beverage: 5
- Community: 4
- State government: 4
- Volunteer: 2
- Hotel: 1

**Figure 2: Submissions by geographical location**

- Unknown: 79
- Perth metro: 39
- National: 25
- Western Australia: 11
- Wheatbelt: 4
- Pilbara: 2
- Great Southern: 2
- Kimberley: 1
- Gascoyne: 1
- South West: 1
Appendix B – Online survey results

During the consultation period, 3,256 people completed the online survey.

Results from the six questions are summarised below. Note that due to rounding, percentages may not add to 100 per cent.

Question 1: Do you support a CDS for Western Australia?

The proposal to implement a CDS in Western Australia was supported by more than 97 per cent of the 3,236 respondents to this question.

Figure 3: Percentage given to each response to Question 1

<table>
<thead>
<tr>
<th>Region</th>
<th>Total</th>
<th>Yes</th>
<th>No</th>
<th>Undecided</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Number</td>
<td>%</td>
<td>Number</td>
</tr>
<tr>
<td>Gascoyne</td>
<td>34</td>
<td>33</td>
<td>97.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Goldfields - Esperance</td>
<td>30</td>
<td>29</td>
<td>96.7</td>
<td>0.0</td>
</tr>
<tr>
<td>Great Southern</td>
<td>97</td>
<td>95</td>
<td>97.9</td>
<td>1</td>
</tr>
<tr>
<td>Kimberley</td>
<td>25</td>
<td>24</td>
<td>96.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Midwest</td>
<td>187</td>
<td>187</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Peel</td>
<td>137</td>
<td>136</td>
<td>99.3</td>
<td>0.0</td>
</tr>
<tr>
<td>Perth metropolitan</td>
<td>2,120</td>
<td>2,045</td>
<td>96.5</td>
<td>40</td>
</tr>
<tr>
<td>Pilbara</td>
<td>112</td>
<td>111</td>
<td>99.1</td>
<td>0.0</td>
</tr>
<tr>
<td>South West</td>
<td>355</td>
<td>349</td>
<td>98.3</td>
<td>2</td>
</tr>
<tr>
<td>Wheatbelt</td>
<td>66</td>
<td>64</td>
<td>97.0</td>
<td>2</td>
</tr>
<tr>
<td>Unknown</td>
<td>73</td>
<td>70</td>
<td>95.9</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3,236</strong></td>
<td><strong>3,143</strong></td>
<td><strong>97.1</strong></td>
<td><strong>48</strong></td>
</tr>
</tbody>
</table>

Table 1: Responses to Question 1 by geographical location
Question 2: Which is the most important benefit of a CDS?

The 3,131 people who responded to this question identified the top three benefits of the scheme to be:

- protect the environment (51.6 per cent);
- reduce litter (25.7 per cent); and
- increase recycling (18.5 per cent).

![Figure 4: Percentage given to each response to Question 2](image)

<table>
<thead>
<tr>
<th>Region</th>
<th>Reduce litter (%)</th>
<th>Increase recycling (%)</th>
<th>Protect the environment (%)</th>
<th>Improve community engagement (%)</th>
<th>No benefit (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gascoyne</td>
<td>21.9</td>
<td>15.6</td>
<td>59.4</td>
<td>3.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Goldfields - Esperance</td>
<td>28.6</td>
<td>25.0</td>
<td>32.1</td>
<td>3.6</td>
<td>10.7</td>
</tr>
<tr>
<td>Great Southern</td>
<td>18.9</td>
<td>22.1</td>
<td>52.6</td>
<td>2.1</td>
<td>4.2</td>
</tr>
<tr>
<td>Kimberley</td>
<td>43.5</td>
<td>17.4</td>
<td>34.8</td>
<td>4.3</td>
<td>0.0</td>
</tr>
<tr>
<td>Midwest</td>
<td>24.7</td>
<td>23.1</td>
<td>48.9</td>
<td>0.5</td>
<td>2.7</td>
</tr>
<tr>
<td>Peel</td>
<td>25.4</td>
<td>17.5</td>
<td>52.4</td>
<td>0.8</td>
<td>4.0</td>
</tr>
<tr>
<td>Perth metropolitan</td>
<td>24.5</td>
<td>18.2</td>
<td>53.0</td>
<td>1.8</td>
<td>2.4</td>
</tr>
<tr>
<td>Pilbara</td>
<td>35.5</td>
<td>21.8</td>
<td>39.1</td>
<td>1.8</td>
<td>1.8</td>
</tr>
<tr>
<td>South West</td>
<td>29.3</td>
<td>18.5</td>
<td>49.9</td>
<td>1.2</td>
<td>1.2</td>
</tr>
<tr>
<td>Wheatbelt</td>
<td>36.9</td>
<td>9.4</td>
<td>50.0</td>
<td>1.6</td>
<td>3.1</td>
</tr>
<tr>
<td>Unknown</td>
<td>25.0</td>
<td>11.8</td>
<td>55.9</td>
<td>1.5</td>
<td>5.9</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>25.7</strong></td>
<td><strong>18.5</strong></td>
<td><strong>51.6</strong></td>
<td><strong>1.7</strong></td>
<td><strong>2.5</strong></td>
</tr>
</tbody>
</table>

Table 2: Responses to Question 2 by geographical location
**Question 3: Where would you prefer to recycle your containers?**

The preferred places to return containers specified by 3,130 people responding to this question were:

- retail centres (52.5 per cent);
- dedicated refund points (27.2 per cent);
- donation points (8.3 per cent); and
- existing recycling centres (8.2 per cent).

### Figure 5: Percentage given to each response to Question 3

<table>
<thead>
<tr>
<th>Region</th>
<th>Retail centres (%)</th>
<th>Dedicated refund points (%)</th>
<th>Donation points (%)</th>
<th>Recycling centres (%)</th>
<th>Tourist destinations (%)</th>
<th>Sporting and entertainment venues (%)</th>
<th>Public events (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gascoyne</td>
<td>20.6</td>
<td>41.2</td>
<td>20.6</td>
<td>8.8</td>
<td>5.9</td>
<td>0.0</td>
<td>2.9</td>
</tr>
<tr>
<td>Goldfields - Esperance</td>
<td>31.0</td>
<td>17.2</td>
<td>27.6</td>
<td>17.2</td>
<td>3.4</td>
<td>0.0</td>
<td>3.4</td>
</tr>
<tr>
<td>Great Southern</td>
<td>40.6</td>
<td>35.4</td>
<td>6.3</td>
<td>15.6</td>
<td>0.0</td>
<td>0.0</td>
<td>2.1</td>
</tr>
<tr>
<td>Kimberley</td>
<td>25.0</td>
<td>54.2</td>
<td>4.2</td>
<td>12.5</td>
<td>4.2</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Midwest</td>
<td>30.1</td>
<td>44.3</td>
<td>7.7</td>
<td>12.6</td>
<td>1.1</td>
<td>2.7</td>
<td>1.6</td>
</tr>
<tr>
<td>Peel</td>
<td>43.3</td>
<td>31.5</td>
<td>11.8</td>
<td>8.7</td>
<td>1.6</td>
<td>1.6</td>
<td>1.6</td>
</tr>
<tr>
<td>Perth metropolitan</td>
<td>59.9</td>
<td>23.0</td>
<td>7.5</td>
<td>6.0</td>
<td>1.1</td>
<td>1.2</td>
<td>1.4</td>
</tr>
<tr>
<td>Pilbara</td>
<td>32.4</td>
<td>46.3</td>
<td>8.3</td>
<td>9.3</td>
<td>1.9</td>
<td>0.9</td>
<td>0.9</td>
</tr>
<tr>
<td>South West</td>
<td>42.0</td>
<td>32.7</td>
<td>10.2</td>
<td>12.2</td>
<td>1.5</td>
<td>0.9</td>
<td>0.6</td>
</tr>
<tr>
<td>Wheatbelt</td>
<td>43.5</td>
<td>25.8</td>
<td>11.3</td>
<td>19.4</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Unknown</td>
<td>50.7</td>
<td>20.9</td>
<td>7.5</td>
<td>16.4</td>
<td>3.0</td>
<td>1.5</td>
<td>0.0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>52.5</strong></td>
<td><strong>27.2</strong></td>
<td><strong>8.3</strong></td>
<td><strong>8.2</strong></td>
<td><strong>1.2</strong></td>
<td><strong>1.2</strong></td>
<td><strong>1.3</strong></td>
</tr>
</tbody>
</table>

Table 3: Responses to Question 3 by geographical location
Question 4: How would you like to receive your refunds?

The 3,138 people who responded to this question indicated the top three preferred options for receiving refunds were:

- cash (62.2 per cent);
- transfer to charity (15.1 per cent); and
- bank transfers (10.7 per cent).

![Figure 6: Percentage given to each response to Question 4](image)

![Table 4: Responses to Question 4 by geographical location](table)
Question 5: Are there any other payment methods you would like to use?

There were 1,081 responses to this question. The most common responses were:

- online payments system (such as PayPal, Android Pay or Apple Pay);
- cryptocurrency (such as bitcoin);
- credit to credit card or other card;
- credit to utility bill (such as gas, water, rates, electricity and taxes);
- fuel or beverage discount voucher;
- accumulate on card and stamps or app, then transfer;
- schools Parents and Children funds;
- something that does not require identification; and
- meal for homeless people.
Question 6: How far do you normally travel for shopping, sport etc.?

People (3,247 responses) most commonly travelled:

- between zero and five kilometres (42.6 per cent);
- between five and ten kilometres (33.0 per cent); and
- between ten and twenty kilometres (14.1 per cent).

Figure 7: Percentage given to each response to Question 6

<table>
<thead>
<tr>
<th>Region</th>
<th>0-5km (%)</th>
<th>5-10km (%)</th>
<th>10-20km (%)</th>
<th>20-50km (%)</th>
<th>50-100km (%)</th>
<th>100+km (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gascoyne</td>
<td>70.6</td>
<td>20.6</td>
<td>2.9</td>
<td>0.0</td>
<td>0.0</td>
<td>5.9</td>
</tr>
<tr>
<td>Goldfields - Esperance</td>
<td>26.7</td>
<td>46.7</td>
<td>6.7</td>
<td>0.0</td>
<td>3.3</td>
<td>16.7</td>
</tr>
<tr>
<td>Great Southern</td>
<td>35.1</td>
<td>24.7</td>
<td>19.6</td>
<td>12.4</td>
<td>2.1</td>
<td>6.2</td>
</tr>
<tr>
<td>Kimberley</td>
<td>52.0</td>
<td>28.0</td>
<td>0.0</td>
<td>4.0</td>
<td>4.0</td>
<td>12.0</td>
</tr>
<tr>
<td>Midwest</td>
<td>24.6</td>
<td>40.6</td>
<td>23.0</td>
<td>5.9</td>
<td>3.7</td>
<td>2.1</td>
</tr>
<tr>
<td>Peel</td>
<td>21.7</td>
<td>37.0</td>
<td>21.0</td>
<td>11.6</td>
<td>5.1</td>
<td>3.6</td>
</tr>
<tr>
<td>Perth metropolitan</td>
<td>46.9</td>
<td>35.7</td>
<td>13.1</td>
<td>3.5</td>
<td>0.5</td>
<td>0.3</td>
</tr>
<tr>
<td>Pilbara</td>
<td>48.2</td>
<td>20.5</td>
<td>12.5</td>
<td>6.3</td>
<td>3.6</td>
<td>8.9</td>
</tr>
<tr>
<td>South West</td>
<td>36.9</td>
<td>21.8</td>
<td>16.2</td>
<td>17.3</td>
<td>5.0</td>
<td>2.8</td>
</tr>
<tr>
<td>Wheatbelt</td>
<td>22.4</td>
<td>9.0</td>
<td>7.5</td>
<td>26.9</td>
<td>22.4</td>
<td>11.9</td>
</tr>
<tr>
<td>Unknown</td>
<td>39.4</td>
<td>35.2</td>
<td>12.7</td>
<td>8.5</td>
<td>1.4</td>
<td>2.8</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>42.6</strong></td>
<td><strong>33.0</strong></td>
<td><strong>14.1</strong></td>
<td><strong>6.4</strong></td>
<td><strong>2.1</strong></td>
<td><strong>1.9</strong></td>
</tr>
</tbody>
</table>

Table 5: Responses to Question 6 by geographical location