



Government of **Western Australia**  
Department of **Water and Environmental Regulation**

# Container deposit scheme: Minimum network standards review

Summary of submissions and recommendations –  
Second review October 2021

Department of Water and Environmental Regulation  
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# 1 Background

The container deposit scheme (CDS), Containers for Change, started on 1 October 2020 to allow people in Western Australia (WA) to return their empty beverage containers to a refund point and receive 10 cents for each eligible container.

The Department of Water and Environmental Regulation (the department) developed the [Minimum network standards: Refund point locations and hours of operation](#) (May 2019). The Minimum network standards seek to balance consumer convenience with scheme costs, as the number of refund points is a key driver for each.

As part of developing the Minimum network standards, the department consulted key stakeholders and the public in 2018. Following consultation, the department released the [Minimum network standards consultation summary](#) (May 2019) which modelled the collection network to provide indicative locations and refund point numbers.

The department started the second review of the Minimum network standards in October 2021, in accordance with the legislative requirements detailed in section 2. This report provides an overview of comments provided by the scheme coordinator, WA Return Recycle Renew Ltd (WARRRL), and the Western Australian Local Government Association (WALGA), along with the outcomes of the review.

## 2 Legislative requirements

The CDS was established under the *Waste Avoidance and Resource Recovery Act 2007*. The *Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations 2019* require that the Minimum network standards are reviewed:

- as soon as practicable after the six-month anniversary of the scheme starting
- after that, at intervals of not more than six months for the first three years
- after that, at intervals of not more than one year.

The scheme started on 1 October 2020.

### 3 Review process

In April 2021, the department commissioned Metrix Consulting to conduct a benchmark study: *Community perceptions of Containers for Change*.

Metrix Consulting undertook an online survey of the WA community (aged 18 years+) between 3 and 17 May 2021. The survey took 10 minutes to complete. Targeted interviews were used in some Perth metro and regional areas to achieve the target samples in locations where refund points have reduced operating hours (refer to section 4.2). A total of 955 online surveys and 208 telephone interviews were completed. The scope and key findings of the benchmark study are summarised in Appendix 1.

In parallel to the benchmark study, the department prepared an issues paper that summarised the matters identified for consideration in the first review.

The issues paper supported consultation with key stakeholders, WALGA and WARRRL.

The department considered all comments and feedback received and has made decisions that seek to balance consumer convenience with scheme costs.

## 4 Issues identified

### 4.1 Application of maximum travel distances

The Minimum network standards (section 1.3, page 3) states:

On and from 12 months from the date of commencement, the coordinator must ensure that the travel distances to a refund point for those persons identified in column 1 of the table in Part 1.3 are no more than those distances specified in column 2 of the table in Part 1.3.	
<b>Column 1</b>	<b>Column 2</b>
<b>Regional category</b>	<b>Maximum travel distance to refund point</b>
Perth metropolitan area	5 km
Inner regional area	50 km
Outer regional area	100 km
Remote and very remote area	200 km

These maximum travel distances were used for modelling network coverage and were based on an approximation of maximum shopping distances customers travel in different areas of the state (The Department of Water and Environmental Regulation, 2019).

It was not intended that exceeding maximum travel distances would result in non-compliance with the Minimum network standards. It is likely that there may be cases where these maximum travel distances are currently exceeded in remote areas.

The benchmark study of community perceptions of Containers for Change found that most scheme users are travelling up to 10 minutes to access their refund point and perception of the scheme is high overall (Metrix Consulting, 2021).

Table 1: Summarised stakeholder comments – application of maximum travel distances

Issue	WALGA comments	WARRRL comments
<p>Application of maximum travel distances:</p> <p>1) Insert additional text applied to section 1.3 of the Minimum network standards to clarify that maximum travel distances are only used to calculate the statewide coverage of the scheme.</p> <p>2) Remove all reference to maximum travel distances.</p>	<p>1. Support.</p> <p>2. Don't support: These distances are important to ensure there is adequate access to refund points</p>	<p>1. Agree to including text to 1.3 regarding maximum travel distances used to calculate coverage.</p> <p>2. Agree to removing 1.3.</p>

### The department's response and recommendations

The maximum travel distances were intended to calculate the statewide coverage of the scheme. Based on the application of maximum travel distances and identified refund points in the Minimum network standards consultation summary, the scheme provides coverage to 98 per cent of the population.

The maximum travel distances also served as an important guide to the coordinator's design of the collection network, ensuring it provides an appropriate level of community accessibility.

Stakeholders support changing the standards to prevent the unintended outcome that the coordinator will inevitably be non-compliant with the regulations.

**The department's recommendation:** Modify text into section 1.3:

On and from 12 months from the date of commencement, the coordinator must endeavour to design the collection network so the travel distances to a refund point for those persons identified in column 1 of the table in Part 1.3 are no more than those distances specified in column 2 of the table in Part 1.3.

## 4.2 Application of sites identified in the Minimum network standards

To support consultation for the draft Minimum network standards, the department modelled a collection network that was consistent with the standards. The modelled network was updated to accommodate the changes to the Minimum network standards made in response to comments received, and was included in the Minimum network standards consultation summary (Department of Water and Environmental Regulation, 2019).

The modelled network was intended to provide context to, and help stakeholders understand, the likely implementation of the Minimum network standards rather than being a set of mandatory locations. Nevertheless, they are widely considered by stakeholders as required sites.

WARRRL advised the department that it may not be able to establish refund points in three of the locations identified:

- Telfer
- Ngaanyatjarra-Giles
- Laverton.

The coordinator has since established a refund point in Laverton.

When approached by WARRRL, Telfer advised that it is a private mining town and was not prepared to open the town to external traffic by opening a refund point. An alternative refund point has been established in Marble Bar.

At the time of consultation, the coordinator had been unable to establish a refund point at Ngaanyatjarra-Giles. The nearest refund point is Warburton Roadhouse, 266 km away.

Table 2: Summarised stakeholder comments – application of identified sites

Issue	WALGA comments	WARRRL comments
<p>Application of sites identified in Minimum network standards consultation summary:</p> <ol style="list-style-type: none"> <li>1) Remove reference to Telfer as an indicative refund point location.</li> <li>2) Scheme coordinator to investigate regular or occasional mobile service for the Ngaanyatjarra-Giles community.</li> </ol>	<ol style="list-style-type: none"> <li>1) No comment.</li> <li>2) Support: Scheme coordinator to investigate regular or occasional mobile service for the Ngaanyatjarra-Giles community.</li> </ol>	<ol style="list-style-type: none"> <li>1) Agree to removing Telfer. Marble Bar refund point has been established.</li> <li>2) Agree to further investigating Ngaanyatjarra-Giles community periodic service. This is a challenging site to visit but WARRRL will continue to investigate opportunities.</li> </ol>

### The department's response and recommendations

While Telfer is mentioned in the Minimum network standards consultation summary as an indicative refund point location, it is not referenced in the Minimum network standards, which is the regulatory document. Telfer is not a public townsite and consequently public access to the townsite cannot be guaranteed. However, WARRRL has negotiated with the Telfer mine operators to facilitate community donation of beverage containers generated from the mine. As an alternative, WARRRL has established a refund point in Marble Bar.

The nearest refund point to Ngaanyatjarra-Giles is at Warburton Roadhouse, 266 km away. WARRRL has provided a commitment to continue to investigate opportunities for a regular or occasional mobile service for the Ngaanyatjarra-Giles community.

**The department's recommendation:** No changes are required to the Minimum network standards.

## 4.3 Definition of seasonal refund point

Regional areas with populations affected by seasonal factors, such as growing seasons and holiday periods, were considered during consultation on the Minimum network standards.

While recognised as an important issue, it was difficult to provide for seasonal populations under the Minimum network standards because of limited reliable data. However, adjustments were made to the modelled collection network in the consultation summary to account for well-known regional areas with significant seasonal populations, including:

- Bremer Bay
- Coral Bay
- Rottnest Island.

The coordinator has established refund points in Coral Bay and at Rottnest Island.

At the time of this review a refund point had not been established in Bremer Bay; however, WARRRL has since advised that a flexible refund point has been established at the Bremer Bay waste transfer station.

*Table 3: Summarised stakeholder comments – seasonal refund point*

<b>Issue</b>	<b>WALGA comments</b>	<b>WARRRL comments</b>
<p>Definition of seasonal refund point:</p> <p>1) Define seasonal refund points as those that serve a town with fewer than 500 people and only operate for part of the year when tourism assists economic viability.</p> <p>2) Exempt seasonal refund points from specified minimum hours required for flexible refund points.</p> <p>3) Allow refund points in addition to those listed in the Minimum network standards</p>	<p>1) Support: In certain parts of WA seasonal refund points can potentially benefit local communities.</p> <p>2) Conditional support: WALGA agrees that seasonal refund points have some flexibility in hours of operation, but the refund point would need to provide some form of justification to the department for the opening hours.</p> <p>3) Support: In some instances, it may be appropriate for some refund points in regional and remote locations to self-identify as seasonal because of their location and therefore have different minimum hours of operation.</p> <p>4) Don't support: COVID-19 has had a significant</p>	<p>1) Agree to define seasonal towns.</p> <p>2) Agree to exempt seasonal towns from minimum hours. This will assist in viability of those points. What hours are being proposed? Will these be seasonal?</p> <p>3) Agree to allow refund points to self-identify as 'seasonal', but request clarity on how/who will identify the towns. What parameters will determine which ones are seasonal?</p> <p>4) Agree to the date ranges if there is some flexibility and there is ability to change these as demand dictates.</p>

<p>to self-identify as 'seasonal'.</p> <p>4) Establish (if required) date ranges applicable for individual seasonal refund points.</p>	<p>impact on tourism in certain parts of WA, showing a substantial increase in many regions. This has meant visitors outside of the seasonal dates or times which were once considered usual.</p>	
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## The department's response and recommendations

### 1) Definition

Seasonal refund points included in the Minimum network standards consultation summary, such as Bremer Bay and Coral Bay, do not have year-round populations to support minimum operating hours (fewer than population threshold of 500 people).

Towns with fewer than 500 people are potentially not economically viable to operate a flexible refund point based on minimum operating hours.

**The department's recommendation:** Define seasonal refund points as those that serve a town with fewer than 500 people and only operate for part of the year when tourism assists economic viability.

Refund points in consultation with WARRRL, as coordinator, can self-identify as seasonal (where they are in towns of fewer than 500 people) and operate for part of the year.

### 2) Minimum hours

Stipulating minimum operating hours during 'tourist season' is subject to a range of variables that might impact on the seasonal economic viability of the refund point.

**The department's recommendation:** Exempt seasonal refund points from specified minimum hours required for flexible refund points.

### 3) Determining the tourist season

Defining the seasonal period for minimum operating hours would require flexibility to respond to any factors that affect the tourist season, such as climate, global health or economic impacts. This would result in ongoing amendments to the Minimum network standards which would be impractical.

**The department's recommendation:** The Minimum network standards should not establish date ranges for seasonal refund points.

## 4.4 Definition of event-based refund point

Event-based refund points were envisaged to service particular social events, such as markets, music festivals, agricultural shows, sporting carnivals, and would only operate for the duration of those events.

It was not intended that event-based refund points would be required to conform to minimum operating hours for flexible refund points (at least 16 ordinary business hours per fortnight, at least eight of which must be weekend hours) nor contribute towards the scheme coordinator's obligation to meet the minimum number of refund points.

The coordinator defines pop-up refund points as follows:

*These provide a scheduled service where refund point operators meet customers every week, fortnight or month. They allow customers, community groups and charities to return their containers for a refund either in cash, via retail cash voucher or through their scheme ID. Some operators count the containers on the spot, whereas others will take your containers back to their sorting point to count later and process your refund (Containers for Change 2021).*

The department notes that WARRRL uses this term in a manner that includes mobile and event-based refund points.

Table 4: Summarised stakeholder comments – definition of pop-up refund point

Issue	WALGA comments	WARRRL comments
<p>Definition of event-based refund point:</p> <p>1) Define event-based refund points as servicing temporary social events that exist outside regular business hours such as markets, music festivals, agricultural shows, sporting carnivals.</p> <p>2) Clarify that event-based refund points do not form part of the</p>	<p>1 and 2) Support.</p> <p>Pop-up refund points have the potential to capture many containers from events. It is unlikely they can adhere to the minimum hours of operation as required under the CDS Minimum network standards and as such should be exempt. WALGA would also suggest that pop-up refund points should also be excluded from the Minimum network standards count of refund points required as they cannot meet these requirements.</p>	<p>1) Agree to the definition.</p> <p>2) If they are 'permanent' in location and time they should be included within the Minimum network standards. These are valuable points the community uses as part of standard journeys or shopping patterns. They also provide a great community feel to the scheme. Including these sites may require a review of what hours a pop-up refund point would need to keep to qualify</p>

Minimum network standards in terms of minimum hours of operation.		as an ongoing pop-up. Alternatively, these could become part of the mobile point definition.
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### The department's response and recommendations

#### 1) Definition

The Minimum network standards do not clearly define event-based. Without a clear definition, a refund point that only operates occasionally could claim to be an event-based refund point with less than the minimal operating hours.

**The department's recommendation:** Define event-based refund points as servicing temporary social events that exist outside regular business hours such as markets, music festivals, agricultural shows, sporting carnivals.

#### 2) Minimum hours

Event-based refund points, by definition, have ad hoc operating hours and therefore cannot be expected to meet regular fortnightly operating hours.

**The department's recommendation:** Clarify that event-based refund points are not required to meet the Minimum network standards minimum hours of operation.

## 4.5 Definition of mobile refund point

### Definition of mobile refund point

The Minimum network standards (section 2, page 4) consider mobile refund points in the definition of a flexible refund point:

<b>Flexible refund point</b>	Flexible refund points can be stationary facilities that must provide at least 16 ordinary business hours per fortnight, at least eight of which must be weekend hours.  Flexible refund points can be mobile refund points, which will not be required to adhere to specified minimum hours, as they need the flexibility to cater for seasonal, mobile, or event-based circumstances.
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Mobile refund points were envisaged as operating from a truck or trailer driven to smaller communities accessible from designated refund point locations. Thereby, communities considered too small for a stationary refund point operating on minimum network standard hours could still receive occasional service via a mobile refund point.

Table 5: Summarised stakeholder comments – definition of mobile refund point

Issue	WALGA comments	WARRRL comments
<p>Definition of mobile refund point:</p> <p>1) Define a mobile refund point as being a refund point that can be easily moved from location to location as part of a vehicle, connected to a vehicle or carried in a vehicle.</p> <p>2) Mobile refund points are not required to meet the minimum hours of operation designated for flexible refund points.</p> <p>3) Refund point locations nominated in the Minimum network standards that are reasonably considered by the scheme coordinator to not be economically viable as stationary refund points can be serviced as mobile refund points.</p>	<p>1) Support.</p> <p>2) Conditional support: A definition of a mobile refund point needs to be included in the Glossary section indicating it is not required to meet the minimum network standard hours of operation for flexible refund points (16 ordinary business hours per fortnight, at least eight of which must be weekend hours). Where a stationary refund point is not economically viable but produces a high container return this should be treated as mobile refund points.</p> <p>3) Conditional support: Mobile refund points would still need to meet some form of minimum servicing standard/operating hours, approved by the department.</p>	<p>1) There is an opportunity to refine this definition to make it clear what these points are. The definition needs to be inclusive of locations where collection infrastructure has been left at a location and is not always attached to a vehicle as per the above point. We also believe there is an opportunity to define hours within this section – as many sites cannot justify the 16-hour fortnightly requirements. The weekend requirements have also put pressure on some smaller communities and Indigenous corporations, for whom the cost/benefit of outlaying weekend penalty rates versus small volume returns presents challenges. In addition, some local government areas do not allow weekend hours for mobile sites, which are extremely popular with the community. In areas where there is not a local refund point because of zoning,</p>

		<p>mobile sites are receiving up to 25,000 containers a day.</p> <p>2) Mobile points should be counted as a refund point.</p> <p>3) Agree mobile points be considered if a stationary point is not viable or there are no other options available in the location.</p>
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**The department’s response and recommendations**

1) Definition

There is currently no definition of a ‘mobile refund point’. Consequently, there could be some confusion as to what constitutes a mobile refund point and is therefore required to meet the Minimum network standards in terms of operating hours.

**The department’s recommendation:** Define a mobile refund point as being a refund point that can be easily moved from location to location as part of a vehicle, connected to a vehicle or carried in a vehicle. Collection infrastructure may be transported to a location then left temporarily in place unattached to any vehicle to receive eligible containers before being transported elsewhere.

2) Minimum hours

Currently under the Minimum network standards, mobile refund points are exempt from the requirement to meet minimum operating hours.

**The department’s recommendation:** Mobile refund points are not required to meet the minimum hours of operation designated for flexible refund points.

3) Economic viability

Refund point locations nominated in the Minimum network standards consultation summary meet a minimum threshold population criterion and are expected to provide a flexible refund point with minimum operating hours. The department notes that there are situations where refund points are not able to operate viably for the minimum operating hours. Some of these refund points are not mobile operations.

**The department’s recommendation:** Further consideration to be given to how the Minimum network standards support convenience and accessibility objectives in locations where economic viability is a concern. This will also require consideration of measures to ensure against an ongoing reduction of refund point accessibility and a strategic response to risks of a diminished collection network because of economic

viability. These matters should be addressed in more detail in the next review of the Minimum network standards.

## References

Containers for Change, 2021, [Where to return, Pop-up refund points](#)

Department of Water and Environmental Regulation, May 2019, [Minimum network standards Consultation summary](#)

Department of Water and Environmental Regulation, May 2019, [Minimum network standards: Refund point locations and hours of operation](#)

Metrix Consulting, June 2021, *Community perceptions of Containers for Change*, unpublished report provided to Department of Water and Environmental Regulation

# Appendix

## Appendix 1 – Community perceptions of Containers for Change

In April 2021, the department commissioned Metrix Consulting to conduct a benchmark study to understand *Community perceptions of Containers for Change* across WA. Key areas of the study were perceptions of convenience and the resulting impact on use of the collection network, with particular focus on refund points with limited operating hours.

Metrix Consulting undertook an online survey of the WA community (aged 18 years+) between 3 and 17 May 2021. The survey took 10 minutes to complete. Targeted interviews were used in some Perth metro and regional areas to achieve the target samples. A total of 955 online surveys and 208 telephone interviews were completed.

Target samples included metro and regional locations with reduced operating hours, shown in the table below. The Gascoyne was also captured as a separate regional sample, because it is the only region without a full-time refund point.

Metro sample locations		
Baldivis	Iluka	Ocean Reef
Coogee	Koondoola	Padbury
Girrawheen	Mindarie	Warwick
Hamilton Hill	Mundijong	Whiteman Park
Regional sample locations		
Balgo	Mount Magnet	Pinjarra
Bidyadanga	Nannup	Toodyay
Boddington	Northam	Warmun
Coolgardie	Onslow	Waroona
Kalumburu	Pannawonica	Wickham
Laverton	Paraburdoo	Wyndham
Leonora	Pemberton	Yungngora (Noonkanbah)

The study concluded that there are differences in community perceptions and behaviours in locations where refund points have limited operating hours and in the Gascoyne.

Other key findings included:

- 93 per cent of the WA community are aware of the scheme
- 60 per cent of the WA community aware of the scheme have returned containers to a refund point
- the proportion of people who have used a refund point is slightly higher in regional areas (64%) than in the metro area (58%)

- engagement with the scheme is highest in the Mid West and Wheatbelt regions (80%)
- families (and those aged 35–54 years) are most likely to have used the CDS
- awareness, understanding and use of the scheme is lower among those aged 18–34
- cash refunds are the most common type of refund, particularly in regional areas
- key motivators for using the scheme are environmental benefits and the monetary refund
- key barriers to using the scheme are largely attitudinal – i.e. the perceived effort relative to the size of the refund
- forgetting to use the scheme and lack of convenience are barriers to greater uptake.