

WA CONTAINER DEPOSIT SCHEME: HAS IT MET STANDARDS?

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Total Environment Centre was established in 1972 and has undertaken over 100 successful national and state environment protection programs. This report was not funded by any container refund scheme participant.

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Introduction

The Western Australian Container Deposit Scheme begins on 1 October 2020. The scheme is run by Containers for Change, including the rollout of refund points. The government set a number of minimum standards and this brief report assesses if the scheme has met a key metric¹; and reviews comparative accessibility for consumers seeking their 10c refund. The convenience of refund points is critical to the rate of return and resulting recycling.

The table below shows the scheme has failed to meet its minimum standards of the scheme for the total of refund sites and the number of flexible sites and hours open.² However, the simple number of sites does not give a clear indication of accessibility.

Standard at commencement	114 f/t sites >35hpw	115 flexible sites >16hrpfortnight	Total sites 172 on Day 1; 229 at end Yr 1
Actual (as at 27/9/20)	121	77 – many not open >16hrpf, incl in Perth, Peel	198+

Comparison to Qld and NSW Accessibility

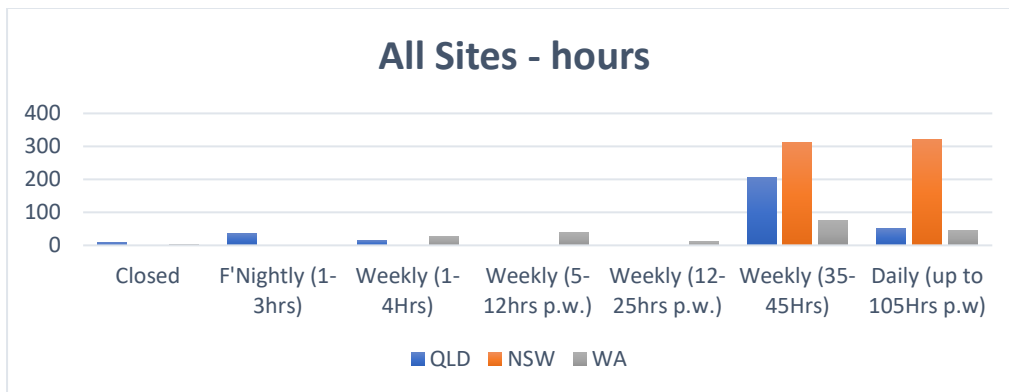
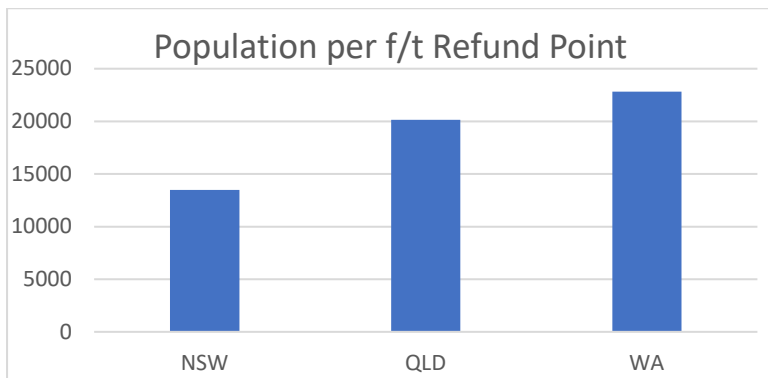
While there can be population distribution differences between each state, it is instructive to show which state has the most full time sites (>35hpw open) per head of population as times of opening are a fundamental metric of accessibility. We recommend that non-F/T sites (those operating just a few hours per week) should not be included in the total, as these artificially bolster the minimum number requirement and distort a real assessment of accessibility.

Notably most of WA's population resides in the Perth, Peel, SouthWest urban regions (85%), higher than the NSW distribution of Sydney/Central Coast/Newcastle/Wollongong (73%). WA has 22,809 people per f/time site; and NSW has 13,486 per f/t site. Thus WA and its main urban areas in particular, have comparatively less accessibility. Rather than being the "most accessible" CDS as claimed by the operators, WA is the least accessible for the majority of the population.

Surprisingly the Perth/Peel region has over 30 flexible sites, when urban areas should be accorded full time accessibility.

¹ Minimum network standards: refund point locations and hours of operation - https://dwer.wa.gov.au/sites/default/files/CDS_Minimum_Network_Standards.pdf

² The minimum network standards state "On and from 12 months from the date of commencement...the minimum number..."



Location of Refund Sites

Consumer surveys commissioned by the WA government³ prior to the decision on the governance model outlined a clear preference for return points being based at convenient retail locations. They found:

'Overall, there is a preference for: Refund points being located at or near places that consumers are already visiting on a regular basis (i.e. being able to build a trip to a refund point into an existing trip such as grocery shopping or purchasing fuel'.

The WA scheme however, opted for a non-retail depot based model and almost a quarter of all sites are only open for between 2-4 hours per week – this may be appropriate for remote towns but should not be used to bolster the overall numbers and comes at the expense of higher levels of access for the major population centres.

Convenience is a major factor globally of well performing schemes and this is not adequate in WA at this time.

³ https://dwer.wa.gov.au/sites/default/files/Key_Considerations_for_Refund_Point_Options.pdf