



Conservation
Council SA

Attn: CDS Review Discussion Paper

Environment Protection Authority
GPO Box 2607, Adelaide SA 5001

19 November 2021

Sent via email: epainfo@sa.gov.au

Dear CDS Reviewers,

RE: Submission regarding Improving South Australia's Recycling Makes Sense

Thank you for the opportunity to provide a submission in response to this important review into South Australia's Container Deposit Scheme (CDS).

The Conservation Council SA (Conservation SA) is an independent, non-profit and strictly non-party political organisation representing around 60 of South Australia's environment and conservation organisations and their 90,000 members.

Our organisation was involved in public advocacy in the 1970's to create SA's much loved CDS, and we have continued to be a strong supporter since. Our state can be justifiably proud of our national and international leadership on this issue.

Conservation SA is a member of the Boomerang Alliance and supports the Alliance's submission to this consultation process and key recommendations.

In addition, we would like to make the following comments:

Shift from litter control to circular economy resource recovery

Over time the value of the CDS to South Australia has only increased. Whilst originally conceived as a litter control intervention, the amount and the quality of the resource recovered, and the spin off industries that have developed on the back of that increased resource recovery, emphasise the CDS as central to improving the circular economy.

Due to the ongoing success of the CDS, extended producer responsibility must be considered for other industries and product types to reduce waste and inefficiency.

Continued national leadership

It is exciting that other jurisdictions have finally embraced CD schemes. However, there is now an inevitable push for national harmonisation of the different state and territory regimes.

While there is no doubt some benefit for national and international producers in harmonisation, there is also a very great danger in reform becoming bogged down and standards downgraded to the level of the laggard players.

South Australia has always been seen as a leader in this area and must not step away from that space.

If the strong support in SA for extending the scope and ambition of the scheme is not matched by others who are just beginning their CDS journey, we should not wait for others to catch up.

Others have always followed our leadership. We should continue to be willing to innovate and strive to improve even if others are reluctant.

Expanding the scheme

We strongly support the recommendations to expand the scope of the scheme, particularly the inclusion of glass and all plastic fruit/vegetable juice and cordial containers (in addition to soft drinks, fruit juice drinks and water) up to 3 litres in size.

The continual breakage of glass through kerbside recovery is an enormous ongoing missed opportunity and cost.

We also believe on balance the expansion of the scheme should include unflavoured milk.

We note the discussion paper's own finding:

"Analysis of an option to include plain unflavoured milk within this change to container scope estimated that an additional 30 million empty HDPE beverage containers will be diverted from the kerbside waste system and returned to the CDS per year (from 679 to 709 million) and the annual net benefit to SA is estimated to increase by \$10 million (from \$76 to \$86 million). Inclusion of plain milk is also estimated to result in a further net increase in employment of 27 (FTE) jobs (from 121 to 148) and a reduced amount of container materials disposed of to landfill from 5,677 tonnes to 5,515 tonnes per year. Whilst the diversion of an estimated 30 million plain milk containers to the CDS will increase the volume of plain milk containers recovered by the CDS, there is little change to local government costs and opportunities stemming from the processing of these recovered containers via the CDS pathway"

If the new benefit is there in terms of jobs and net benefit, then this option should be considered.

We also question the exclusion of items smaller than 150ml. The argument – primarily one of national harmonisation – is one that we reject (see above). Smaller items have been included in our scheme for many years and should remain. Otherwise, there is a risk that manufacturers will deliberately downscale the size of their containers, with an unwelcome subsequent increase in amount of plastic per volume of liquid sold.

Increase the refund amount

It has been well over a decade since the refund amount was increased.

We believe an increase is needed to achieve higher return rates and the maintenance of the value of the deposit in line with inflation. An increase in the refund amount will help reverse the decline in return rates.

Thank you again for the opportunity to provide a submission on *Improving South Australia's Recycling Makes Sense*.

I am happy for this submission to be published.

If you require further information, please contact me at craig.wilkins@conservationsa.org.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Craig', followed by a stylized flourish or checkmark.

Craig Wilkins
Chief Executive