

30 June 2017

Mr Joe Kelly, MP  
Chair  
Agriculture and Environment Committee  
Queensland Parliament  
Parliament House  
George Street  
Brisbane QLD 4000

[aec@parliament.qld.gov.au](mailto:aec@parliament.qld.gov.au)

Dear Mr Kelly,

**Submission to the Inquiry into the *Waste Reduction and Recycling Amendment Bill 2017***

Firstly, the Queensland Hotels Association (QHA) would like to thank the Committee for allowing comment on the Bill before the Queensland Parliament.

The QHA is the peak body representing the hotel and tourism accommodation industry in Queensland. Currently our membership comprises over 800 members, covering the state from beyond the tip of Cape York, to the Western country pubs, and throughout the coastal strip down to Coolangatta. These are the employers of over 80,000 Queenslanders.

Our goal is to promote a business environment that encourages these companies to invest, or re-invest, in Queensland, and in which members of the hotel and hospitality industry can operate responsibly and prosperously.

Hotels in Queensland represent the only retail off-premise points of sale for bottled and canned alcoholic products. Each commercial hotel liquor licence allows the sale of liquor products for consumption on and off the premises and includes take away sales of packaged liquor over the counter, from drive-thru bottle shops, and detached bottle shops.

The QHA offers the Committee the following points for consideration in its inquiry into the Bill:

**Costs and economic data**

The QHA is concerned that hotels, especially small to medium operators, may be financially disadvantaged by beverage suppliers passing the 10 cent refund and additional handling costs directly on to retailers and theoretically consumers in the form of a price rise.

A disproportionate cost burden on small to medium hotel businesses may be exacerbated by their inability to absorb these increased costs and that there will be a limit to passing on increases and still remaining price competitive.

Invariably there will be a direct cost and impact on the consumer, and the inconvenience of returning containers to a specified point instead of just placing in their existing domestic recycling bin.

The QHA submits that economic modelling data be undertaken and provided regarding these potential business cost inequities. A transition arrangements to lessen this burden to the companies should include some compensation.

### Container refund points

Detailed information and consultation is required to determine the practical locations, logistics and infrastructure for proposed container refund points, including the payment and redemption processes.

The QHA submits that our hotel members would not generally consider their businesses to be an appropriate container collection/refund point.

### Product Responsibility Organisation Board structure

The proposed composition of the Board is to include: a chair independent of the beverage industry; at least one director representing small beverage manufacturers and one director representing large beverage manufacturers; at least one director representing the interests of the community and two directors with legal or financial qualifications or experience who are independent of the beverage industry.

QHA submits there needs to be representation from the retail liquor industry – hotels are the only sellers of retail liquor products for off-premise consumption. Further, the composition of the Board must ensure there are no conflicts of interest.

### Timing of the implementation of the scheme

The QHA submits there needs to be a realistic timeframe for the proper and effective implementation of the container deposit scheme – the proposed implementation date of 1 July 2018 should be flexible and able to be extended to ensure the following:

- an appropriate transition time to allow stock transition in retail and supplier chains and holdings
- utilisation of any lessons from other jurisdictions – for example, NSW has delayed the implementation of the scheme by six months to now be 1 December 2017. An opportunity is apparent to evaluate the roll-out of the scheme in NSW - logistics around container refund points and locations; best communication and education methods for retail and consumers.

QHA submits that our member hotels are the approved retailers of packaged liquor and eligible beverage containers. Our members will be the interface between the container manufacturers and

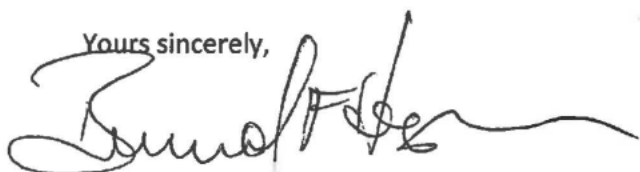
the consumer, and as such will be the primary point of public communication and education regarding the scheme. An appropriate lead-in timeframe is critical to enable proper preparation and promulgation of these key messages to retailers and consumers.

Consultation with hospitality industry

As the peak representative body for an industry that will be highly affected by these decisions, we request that our representatives be actively involved in providing insights into these critical decisions for the Committee and would be available at any hearings for the Committee.

Please contact me directly on [REDACTED] or [REDACTED] should you require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bernie Hogan', written in a cursive style.

**Bernie Hogan**  
**Chief Executive**  
**Queensland Hotels Association**