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To Whom it May Concern,

The National Retail Association (NRA) welcomes the Queensland Environment Minister's approach to reducing the environmental and social impacts of lightweight (single-use) plastic shopping bags and the Container Refund Scheme (CRS). Both retailers and their customers share their concern about the harmful impact of littering on the environment and subsequent economic impact on the State.

The NRA is Australia's largest and most representative retail industry organisation, servicing more than 20,000 stores and outlets nationwide. We are a not-for-profit organisation built on strong relationships with our members.

We exist to help retail and service sector businesses comply with an ever changing and growing regulatory environment. Our services are delivered by highly trained and well-qualified in-house team of experts with industry specific knowledge and experience. We provide professional services and critical information right across the retail industry, including the majority of national retail chains and thousands of small businesses, independent retailers, franchisees and other service sector employers.

Members are drawn from all of the sub-categories of retail including fashion, groceries, department stores, household goods, hardware, fast food, cafes and personal services like hairdressing and beauty. In Queensland, our membership is comprised of over 5,000 stores and outlets, across all regions and across all the sub-categories of retail products.

We compliment the Government on its close work with key stakeholders on the Container Refund Scheme Implementation Advisory Group. This has given all stakeholders from the beverage and retail, local government, waste and recycling, and environment and community sectors over a year of opportunity to comment on the Bills development.

NRA supports the Queensland Government's decision to ban the use of lightweight plastic shopping bags and is also supportive of the aim of reducing the impact of drink container litter on our natural environment with a CRS. We understand that the Government seeks to address the low recycling rates in Queensland. However, the overwhelming cost of the proposed Schemes will heavily fall on consumers.



There are tens of millions of customers shopping across Australia every week, the CRS will add to a significant cost of living impact for some customers. Therefore, it is important that the costs of the Scheme, including any administrative costs and handling fees are kept to a minimum to mitigate the impact on already stretched household budgets.

The cost obviously has a flow-on effect for industry, with decreased demand for products because consumers can no longer afford them or they will purchase reduced quantities.

A significant decrease in demand could damage the beverage industry with a lack of certainty for stakeholders to invest in the future and could even lead to an increase in unemployment. Additionally, business will be required to make a significant investment in systems to track and monitor products and comply with the Scheme.

Experience from other sectors, such as aviation which impose a "cost-recovery" fee on industry, is that the Administration tends over time towards an expansion of activities, functions, and resources. Without strict rules, the Administrator has little incentive to minimise costs.

A comprehensive communication strategy is important because retailers are focused on meeting customer expectations, and should not be responsible for explaining government policy. The NRA understands that the Queensland EHP has adopted a state-based approach to national issues. We applaud them for making the public-facing elements of the initiatives as consistent as possible to avoid consumer confusion and address national retailer harmonisation.

The NRA believes that the implementation date of 1 July 2018, allows enough time for consumers and retailers alike to make this transition for both the ban of lightweight plastic bags and the introduction of the CRS.

The Bill recognises that the CRS has the dual objectives of reducing litter and increasing recycling. The Bill provides for the Minister to invite an application from a suitable entity to form a product responsibility organisation (PRO) to administer the scheme in Queensland.

We consider representation from the retail sector in the PRO essential, as retailers play a vital part in many facets of the scheme. Foremost, retailers have a good understanding of the expectations of their customers as they interact with them daily, and are well placed to understand their needs.

Queensland has a large tourism industry and NRA's members in tourist areas like Cairns and the Gold Coast are heavily reliant on tourist trade. We need to understand the implications of such a scheme for them.

On plastic bags, the NRA stresses the need for a nationally consistent policy on the ban of lightweight, single-use plastic bags (including biodegrade bags) at less than 35 microns.

On CRS, the NRA submits that maintaining consistency between the State and Territories is paramount to the successful of the CRS. We understand that the Queensland Government is working on adopting processes that align with other states to reduce the duplication that may occur. For example, the adoption of a national refund mark and utilising registration arrangements of containers from other states.

The primary message for the public is one of litter reduction. The NRA considers the need for co-branded communications and messaging for the consumer to ensure messages are uniform and consistent across the industry.

We need to ensure a high level of awareness by public / customers, including tourists, so there will be no confusion about what rules apply in Queensland. It is vital that the Government

provides a consumer awareness program prior to, and long after the implementation date to ensure consumers are aware of the legislated changes.

We hope that by coming together and forming a unified view on any plastic bag policy, retailers have demonstrated that they want to make a positive contribution to your deliberations in this matter. Our members are eager to be an active part of any solution and we are well placed to assist.. Any change in legislation needs to have wide level support and understanding by consumers to mitigate misconceptions

When the Government proceeds, we are keen to assist with the development and implementation of key messages which will ensure the impact on customers is kept to a minimum in terms of both cost and inconvenience. A government information campaign is essential so that customers are aware this is a government initiative. This will also assist with the protection of retail team members from irate customers.

We appreciate your assistance in this matter and look forward to hearing from you. I may be contacted on [REDACTED] or by email [REDACTED]

Yours faithfully,

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

David Stout
Manager Policy