

Health, Environment and Innovation Committee
Inquiry into Improving Queensland's Container Refund Scheme

Department of the Environment, Tourism, Science and Innovation response to written submissions

List of submitters

Submission No.	Submitter
1	Name Withheld
2	Peter Brown
3	Name Withheld
4	Len Mitcham
5	Name Withheld
6	Ray Ison
7	Paul Creighton
8	Ocean Crusaders Foundation LTD
9	Robin Davies
10	Name Withheld
11	Number not allocated
12	Anthony Chesher
13	Pamela Hughes
14	Robert Taylor
15	Martin Wilder
16	Name Withheld
17	Beverly Curtis
18	Alyssa Lai
19	Rachel Cassidy
20	Mornington Shire Council
21	Tony Kozera
22	Koala Action Inc.
23	Mark Taylor

Submission No.	Submitter
25	Peter Ridgewell
26	Geoffrey O'Donoghue
27	Container Refund Point - Kingaroy
28	Glen Crawford
29	Shayna Jones
30	Sylvia Cooper
31	Alison Smith
32	Trinity Gullifer
33	Rockhampton Symphony Orchestra Inc
34	Brooke Summerville
35	Rotary Club of Kenmore Inc
36	Confidential
37	Centaur Memorial Fund for Nurses
38	The Exchange Shed
39	Container Exchange
40	Alastair Dooley
41	Recycling Hills District/Brisbane North Inc.
42	Leonie Barner
43	Daintree Life
44	Linda Bailey
45	Bribie Island VIEW Club
46	Confidential
47	Manas Mallick

Submission No.	Submitter
24	Elmer Ten-Haken
49	Surfrider Foundation Australia
50	Name Withheld
51	Black Hops Craft Pty Ltd
52	Five Barrel Brewing
53	BOOMERANG ALLIANCE/TOTAL ENVIRONMENT CENTRE
54	Confidential
55	Name Withheld
56	Granite Belt Sustainable Action Network
57	Netball Queensland
58	Confidential
59	Julie Jackson
60	Australian Grape & Wine
61	Australian Council of Recycling
62	Tony Martin
63	Ramona Headifen
64	Confidential
65	BeachPatrol Australia
66	Clean Up Australia
67	Re.Group
68	Brighton Bowls Club Inc
69	Name Withheld
70	Confidential
71	Pact Group
72	Brouhaha Brewery Pty Ltd
73	Rebecca Young
74	Confidential
75	Moffat Beach Brewing Co.

Submission No.	Submitter
48	Independent Brewers Association
77	Australian Beverages Council Limited
78	Queensland Distillers Association (QDA)
79	Steve Pannan
80	Granddad Jack's Craft Distillery
81	Name Withheld
82	Name Withheld
83	Waste Recycling Industry Association Queensland (WRIQ)
84	Substation 33
85	Confidential
86	Kalki Moon Distilling Company
87	Confidential
88	Tetra Pak
89	National Retail Association
90	Coca-Cola Europacific Partners
91	Waste Management and Resource Recovery Association of Australia
92	Lion
93	TOMRA
94	P&Cs Qld
95	CAVU Distilling Pty Ltd
96	Name Withheld
97	Retail Drinks Australia
98	Reloop Pacific
99	LGAQ
100	Queensland Hotels Association
101	Confidential
102	Australian Food & Grocery Council
103	GS1 Australia

Submission No.	Submitter
76	Confidential
105	Boonah organisation for a sustainable shire
106	Pending
107	Rosemary Howson
108	Confidential
109	Confidential
110	Gill Jeffery
111	Confidential
112	Cleanaway

Submission No.	Submitter
104	Canefields

Acronyms

COEX	Container Exchange – the Organisation appointed to administer the operations of the Queensland Container Refund Scheme
CRP	Container Refund Point
department	Department of the Environment, Tourism, Science and Innovation
LPB	Liquid paperboard
MRF	Material Recovery Facility
P&C	Parents and Citizens Association
PET	Polyethylene terephthalate
PRO	Product Responsibility Organisation
Scheme	Container Refund Scheme
SEQ	South East Queensland
RVM	Reverse Vending Machine
Waste Strategy	Queensland's Waste Strategy
WRR Act	<i>Waste Reduction and Recycling Act 2011</i>

Topic 1: The Current state and operation of Queensland's Scheme

Item	Submission No(s).	Summary of key point in submission	Department's response
Scheme requirement and operation			
1.1	28, 39, 40, 56, 59, 89	Several submissions considered the Scheme was generally good.	The department notes that some submissions expressed support for the Scheme in its current form.
1.2	53	Noted a range of unactioned recommendations from the <i>Health report on the Queensland container refund scheme</i> ¹ conducted by the submitter, Total Environment Centre, in 2020.	The department notes the review from 2020 and that many of the recommendations made in the report have been raised through this submission process. The department looks forward to receiving the Committee's report and any of their recommendations to improve the Scheme will be considered as part of the Government's Response.
Negative impacts on sectors			
1.3	38, 52, 78, 79, 80, 81, 86, 95, 100, 104	Several submissions expressed concerns about administrative processes (e.g. the requirement for a refund declaration and photo ID for bulk claims of 1,500 or more containers). Consideration that the Scheme places a significant financial and administrative burden on small producers, with the current structure excessively affecting independent brewers.	The department notes some customers identified opportunities to simplify administrative processes to encourage more participation in the Scheme. Administration associated with memberships and refunds is a matter for COEX. The department notes a number of submissions identified opportunities to reduce administrative burden for beverage manufacturers. This included suggestions for harmonising requirements across jurisdictions and providing, for example, a single portal to register containers for multiple Schemes. The department is continuing to engage across jurisdictions around options for harmonisation and will assess the costs and benefits for Queensland.

Item	Submission No(s).	Summary of key point in submission	Department's response
1.4	60, 78, 79, 80, 81, 86, 95, 104	Some submissions expressed the view that the Wine and Spirit Expansion in 2023 lacked a clear policy rationale or a fair, evidence-based assessment of alternatives.	The department notes these submissions. Public consultation was undertaken prior to the establishment of the Scheme and again when the Scheme was expanded to include wine and spirit bottles. Through these processes, the potential impacts on beverage manufacturers were considered. Any future changes to the Scheme would need to carefully consider the financial and non-financial impacts on beverage manufacturers, businesses and Queenslanders.

Topic 2: The efficiency and effectiveness in meeting the Scheme's objects in the *Waste Reduction and Recycling Act 2011*

Item	Submission No(s).	Summary of key point in submission	Department's response
Negative performance			
2.1	2, 65, 78, 79, 80, 81, 86, 93, 95, 96, 99, 100, 104	Several submissions opposed the Scheme and considered that it was not meeting, or had failed, its objectives of increasing recycling, reducing litter, including plastic pollution or in container recovery (e.g. estimated 95 per cent of spirit bottles are not recovered), and would like a review of the Scheme's objectives .	The department notes that some submissions did not consider the Scheme to be meeting its objectives. It is noted that the Scheme has resulted in more than 11² billion containers being collected through CRPs and MRFs, which has resulted in an increase to the recycling rates of empty beverage containers from 18³ per cent to 67.4⁴ per cent since commencement. The Scheme has also resulted in a reduction in the littering of beverage containers by 60⁵ per cent over the same period.
2.2	1, 83, 91, 102	Some submissions commented that the Scheme does not complement existing collection and recycling activities for recyclable waste, with the Scheme in direct competition with existing facilities and impacting their ongoing viability, and that materials already captured through existing, economical recycling systems should not be duplicated in the Scheme.	The department notes that there are still opportunities for improvement, as there is still some way to go to achieve the 85 per cent recovery rate set in the legislation, and it is important to acknowledge this and ensure there is a plan to achieve it. The department looks forward to receiving the Committee's report and any recommendations to improve the Scheme will be considered as part of the Government's Response.

Item	Submission No(s).	Summary of key point in submission	Department's response
Positive performance			
2.3	6, 15, 21, 25, 28, 33, 39, 40, 55, 57, 63, 68, 89, 90, 92, 98, 110	Several submissions considered that the Scheme had been effective in meeting its objectives, including reducing litter, improving recycling and reducing plastic pollution.	The department notes the general support within the submissions for the Schemes accomplishments in improving the recycling rate and reducing litter, and acknowledges those submissions that suggest there is still room for improvement. The department's response above for items 2.1 and 2.2 detail the Scheme's achievements.
2.4	12, 13, 33, 35, 38, 49, 55, 56, 84, 94, 110	Several submissions considered that charities, social enterprises, and other community groups should be and are benefitting from the Scheme.	The department has noted the positive impact the Scheme has had for fundraising efforts for charities, community groups and not-for-profits who participate in the Scheme. This is a key objective of the Scheme.

Topic 3: The efficiency and effectiveness of the administration by COEX as the Product Responsibility Organisation

Item	Submission No(s).	Summary of key point in submission	Department's response
Negative performance			
3.1	35, 38, 67, 69, 96	Several submissions considered the decision process and approvals for new operators or collection points was negative ; that having RVMs in close proximity to existing operators has resulted in a disincentive for investment by operators, and noted issues with the administration of COEX , particularly the way in which it engages in contracting, or the way COEX deals with CRPs, including: siting criteria, approval processes, complaint handling, financial incentives, regular performance audits, and contract accountability and enforcement. One submission also proposed redesigning the return network using a strategic master plan to optimise geographic distribution and protect existing investments .	The department notes the comments around COEX's role, its contractual arrangements with operators and processes for network expansion COEX's Strategic Plan provides an opportunity to more clearly identify its growth strategy and how it intends to increase collection points, while still supporting a viable network of existing operators. There would be benefits in considering how this could be made more transparent, especially to existing operators. Should the inquiry make findings or recommendations about specific issues, these will be considered as part of the Government's Response and the Minister's role in exercising the requirements in the legislation.

Item	Submission No(s).	Summary of key point in submission	Department's response
3.2	60, 78, 79, 80, 81, 86, 95, 104	Several submissions considered that manufacturers have been fully burdened with the Scheme's operation. These submissions made recommendations to simplifying the Scheme to reduce administration costs and expressed the view that further Scheme expansions will lead to public confusion.	The department notes the concerns from beverage manufacturers around the financial impacts on businesses from the Scheme and their proposed recommendations. The Scheme price charged to manufacturers is set by COEX as part of their duties under the WRR Act and is charged to beverage manufacturers to contribute to the costs of refunds for the empty containers of the manufacturer's beverage products, and the administration of the Scheme. Scheme administration includes components such as container handling fees, transport and logistics and recycling processing. How Scheme price relates to the cost-per-container-recovered, and the specifics of how COEX set that price, are matters for COEX as the PRO. Refer to the department's response above to item 1.4 in relation to consultation on the Scheme.
3.3	78, 79, 80, 81, 82, 86, 95, 100, 104	Several submissions considered the lack of infrastructure to track the recovery rates of spirit bottles was an issue and observed that 95 per cent of containers are paid for through manufacturer contributions but not necessarily recovered. These submissions collectively expressed a view that the Scheme is ineffective as it is failing to hit the legislated target of 85 per cent recovery.	The department notes concerns about the access to data from the Scheme and the impact it has on public confidence, Scheme integrity and investment decisions. COEX does provide data about the Scheme, including information or data relating to the final processing and utilisation of recycled products, through COEX's annual reports, which are published on COEX's website. More broadly, public oversight and transparency of the PRO and its activities is accomplished through a reporting regime set out in the WRR Act. The department acknowledges there are growing calls for more transparent and accessible data from the Scheme. Should the inquiry identify more reporting requirements or recommendations to increase transparency, these will be considered as part of the Government's Response and the Minister's role in exercising the requirements in the legislation.

Item	Submission No(s).	Summary of key point in submission	Department's response
3.4	3, 35, 69, 78, 79, 80, 81, 83, 86, 91, 95, 96, 98, 99, 104	Several submissions expressed negative views of COEX, some going so far as to suggest fraudulent behaviour and a particular focus on their perceived lack of financial accountability and governance, along with inadequate consultation or complaint management processes. Several submissions expressed opposition about the Scheme and COEX's administration, citing concerns with a lack of accountability, operator consultation, transparency, governance, inadequate complaint resolution management, and some requested an independent review of COEX.	The department notes the comments around COEX's role, its contractual arrangements and potential conflicts. COEX would be best placed to comment on any specific operational matters or individual complaints. One of the functions of the PRO under the WRR Act is to receive and deal with complaints relating to the Scheme from members of the public and entities participating in the Scheme. To the extent that the comments address a need for more transparency, governance and accountability, the department notes these concerns, and should the inquiry make findings or recommendations about specific issues, these will be considered as part of the Government's Response and the Minister's role in exercising the requirements in the legislation.
3.5	94	This submission considered collaboration opportunities missed and expansion through schools had not been acted upon and recommended appointing P&Cs as CRP Coordinators to leverage their expertise and community engagement through the Containers for Schools Program.	The department notes suggestions that greater participation in schools will help to improve the recovery rate and efficiency of the Scheme. The department notes that promotion of the Scheme is an obligation of COEX as the PRO, and in the most recent annual report COEX have provided information on the number of schools which have registered to participate, along with information about the value returned to these school communities through the Scheme. It should be noted that participation in the Scheme is mandatory for beverage manufacturers, but voluntary for individuals and organisations who want to participate to collect containers and receive a refund.
3.6	78, 79, 80, 81, 86, 95, 104	Several submissions raised concerns about the Scheme price paid by beverage manufacturers, the difference between Scheme price and processing fees paid to CRP operators, and whether COEX has been making a profit at the expense of the success of the Scheme.	The department notes the concerns from beverage manufacturers around the financial impacts on businesses from the Scheme. Queensland's Scheme is a product stewardship arrangement with the costs of operating the Scheme and recovering the containers for recycling paid for by drink manufacturers. This means that drink manufacturers take responsibility for ensuring that the environmental impacts from the empty drink containers are reduced.

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			Consultation was undertaken prior to establishment of the Scheme and when the Scheme was expanded to include wine and spirit bottles. This considered the potential impacts on beverage manufacturers. Under the WRR Act, COEX is responsible for setting the price paid by beverage manufacturers for each container and the price paid to operators of CRPs (section 99J). See the department's response above for item 3.2 in relation to Scheme price. COEX is required to provide a Strategic Plan, Operational Plan and budget to the Minister by 31 March each year (section 102ZG WRR Act). COEX is also required to publish an annual report, which includes audited financial statements (section 102ZJ WRR Act). The WRR Act also requires the PRO to be registered under the Commonwealth <i>Corporations Act 2001</i> and be carried out as a not-for-profit organisation. It is understood some operating surpluses are maintained by COEX to assist with cash flow and that surpluses beyond this are generally contributed back into the Scheme (e.g. through expansion of collection points, increased education and awareness etc). Any future changes to the Scheme would need to carefully consider the financial and non-financial impacts on beverage manufacturers, businesses and Queenslanders.
Positive performance			
3.7	28, 39, 40, 48, 57, 68, 72, 82, 84, 89, 90, 92, 102	Several submissions supported the Scheme and COEX's administration, and considered that the Scheme has driven positive environmental and economic change under COEX as the PRO in comparison to other jurisdictions. Submissions also expressed support for CRPs and such programs as the home bag collection service which enabled access to the Scheme for those with accessibility barriers.	The department notes the general support within the submissions for the Scheme's accomplishments in improving the recycling rate and reducing litter and acknowledges those submissions that suggest there is still room for improvement. The department notes COEX's submission reporting a 90 per cent satisfaction rating with the Containers for Change partners program. The department recognises that there are still opportunities for improvement, as there is still some way to go to achieve the 85 per cent

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			recovery rate set in the legislation, and it is important to acknowledge this and ensure there is a plan to achieve it.

Topic 4: The progress toward the recovery rate target of 85 per cent.

Item	Submission No(s).	Summary of key point in submission	Department's response
	Refund amounts		
4.1	3, 5, 6, 7, 10, 12, 13, 14, 15, 17, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 33, 34, 37, 38, 41, 42, 43, 45, 47, 49, 50, 53, 56, 61, 63, 65, 66, 67, 69, 71, 84, 91, 93, 94, 97, 98, 112	A multitude of submissions recommended there was a need to increase the refund amount from 10 cents (to varying amounts and using varying structures – suggesting amounts of 15 cents, 20 cents, 50 cents and \$1). Support for this proposal was spread across a diversity of submission types including individuals, charities, recyclers, and collection point operators.	The department notes the many submissions that suggested the refund amount should be increased, while a lesser number were opposed to an increase to help achieve the recovery target. The 10-cent refund amount is prescribed in the Waste Reduction and Recycling Regulation 2023, with this amount consistent with Schemes across Australia. The refund amount of 10 cents was set to ensure consistency with other Scheme's across the country. Any change to the refund amount would also require consideration with other jurisdictions to ensure there is not significant movement of containers between Schemes operating in other jurisdictions. Any change to the refund amount would require further policy consideration by Government and consideration of any financial impacts to businesses and Queenslanders.
4.2	48, 51, 52, 72, 77, 89, 92	Some submissions were opposed to an increase in the refund amount.	

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Comparative recovery rate			
4.3	90, 92, 97	Some submissions consider the Scheme was performing well. The Scheme is outperforming other Schemes on a per capita basis , despite Queensland's size, remote locations and terrain , and its recovery rate is amongst the best performing Schemes nationally. They compare the container recovery rate against Queensland's Waste Strategy targets of 60 per cent by 2025 and 65 per cent by 2030 and notes progress compared to 18 per cent recycling rate prior to commencement and 88 per cent recovery of aluminium cans .	The department notes the support for the Scheme. Refer to the department's response above to items 2.1 and 2.2 which highlight the Scheme's achievements. The department recognises that there are still opportunities for improvement, as there is still some way to go to achieve the 85 per cent recovery rate set in the legislation, and it is important to acknowledge this and ensure there is a plan to achieve it.
Joint setting of targets			
4.4	99	One submission was of the view that container recovery targets should be jointly developed by the Queensland Government and local government to provide direction and enable measurement of outcomes.	The department notes the comments in relation to working closely with local governments. Queensland's Waste Strategy provides the long term framework and targets for improving waste management and resource recovery in Queensland. The Government will update the Waste Strategy in 2025 in consultation with industry, local governments and other stakeholders to ensure their voices are heard.

Item	Submission No(s).	Summary of key point in submission	Department's response
Factors impacting achievement of the recovery rate target			
4.5	38, 42, 69, 71, 83	Several submissions consider the target is unattainable. These submissions noted that no State has achieved the target, and that other countries that have met it offer higher refund amounts or financial deterrents for improper disposal. Submissions also noted that targets were set without waste and recycling understanding or sufficient consultation.	The department notes the submissions in relation to the 85 per cent target and whether it is achievable or not and comparisons with other Schemes nationally and internationally. The recovery rate was set through the stakeholder advisory group formed to guide the Scheme design. Consideration was given to the South Australian Scheme's performance at the time achieving 76 per cent and setting the target for Queensland at 85 per cent as an ambitious but achievable target. Regional data in Queensland shows that the recovery rate is achievable, with a number of regional communities in Queensland already achieving the 85 per cent target at various points in time (regional data has been provided to the Committee in response to questions taken on notice from the department's public briefing held on 2 April 2025). It is acknowledged that further work is required, particularly in metro areas and SEQ, to increase the recovery rate overall for the State and achieve the legislated target of 85 per cent.
4.6	61, 78, 79, 80, 81, 86, 94, 95, 98, 102, 104	Several submissions note that improved Scheme governance and accountability mechanisms are required to achieve the target. Mechanisms to achieve the target have not all been activated, and a strong refund value, and optimisation of operational structures would support target achievement. The target has not been met because COEX administration lacks infrastructure, technology, and has inadequate systems and accountability mechanisms. One submission expressed the view that it is in the beverage industry's interests to disincentivise consumer participation through a low refund value and an inconvenient collection network.	The department notes the comments around COEX's role, its contractual arrangements and potential conflicts. Should the inquiry make findings or recommendations about specific issues or improved governance arrangements, these will be considered as part of the Government's Response and the Minister's role in exercising the requirements in the legislation.

Item	Submission No(s).	Summary of key point in submission	Department's response
4.7	5, 27, 38, 40, 50, 55, 56, 61, 67, 84, 89, 92, 97, 98, 99	Some submissions identified that participation could be improved through greater education, communication and promotion to schools, sporting clubs, community services and other groups. Other submissions expressed a view that declining community support for the Scheme has resulted in the return rate having plateaued.	The department notes suggestions that greater participation in schools will help to improve the recovery rate and efficiency of the Scheme. Currently, one of the functions of COEX as the PRO is to promote the Scheme. Part of the revenue collected by COEX goes towards awareness raising and advertising to ensure the community is aware of how and where they can return containers. More broadly the department is working to increase recycling and reduce littering and will continue to do so through a range of policy interventions, projects, and education and behaviour change initiatives. This includes for example the Let's Get It Sorted Partnership Program with councils, which provides funding and tools to councils to help promote recycling in local communities.

Topic 5: The availability of refund points across Queensland to provide access to return empty beverage containers.

Item	Submission No(s).	Summary of key point in submission	Department's response
5.1	3, 10, 12, 15, 19, 22, 24, 26, 27, 28, 29, 30, 34, 38, 41, 42, 44, 48, 50, 53, 56, 61, 63, 65, 67, 69, 71, 77, 78, 79, 80, 81, 83, 84, 86, 89, 90, 91, 92, 93, 94, 95, 96,	Many submissions expressed concern with the network, whether because there are not enough collection points, they are poorly located or operated, or that they were not accessible. Many submissions suggested improving convenience at collection points and enabling return of containers that have been crushed or without a label. Submissions noted that consideration should be given to not establishing new points near existing points, and that the administration and expression of interest process for CRPs requires clarification, transparency and industry consultation.	The department notes comments in relation to regional access, inconvenient and inaccessible CRP locations, the need for more CRPs, including requests for alternate collection methods and types of refund points across the State. Access to convenient CRPs is considered a key component to increasing container recovery in Queensland. By comparison with other jurisdictions, Queensland does not have as many CRPs. In 2024, New South Wales had the most CRPs with 633⁶, followed by Victoria with 564⁷, with Queensland having the next number of CRPs with 354⁸. Further comparisons with international Schemes identified that across Norway – which achieved 92.3⁹ per cent recovery in 2023 – there are approximately 3,900¹⁰ RVMs in 3,500¹¹ collection points and approximately 11,500¹² return points operating manually. These two return methods and numbers equate to one return point for every 362¹³ people. Queensland by comparison has approximately 1¹⁴ return point for every 15,843¹⁵ people.

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	97, 98, 102, 104, 105	Other submissions suggested COEX should report on their compliance with the community access standards. Many submissions recommended the adoption of variations of a return-to-retail collection model, and while several advocated for additional RVMs, another submission expressed a preference for dealing with individuals rather than machines in their choice of collection points. One submission proposed mandating a collection point for retailers over a certain size. Other proposed collection points included shopping centres, food courts, supermarkets, multi-unit dwellings and commercial buildings, attached to public bins, at event stadiums, at sporting events and more.	The PRO is responsible for ensuring that an effective and efficient Scheme operates in Queensland, and that there is convenient and state-wide access to container refund points. COEX has reported to the department as part of its draft Strategic Plan FY26-28 that depots continue to be the primary collection channel, collecting 94 per cent of December 2024 volumes. However, as part of its Strategic Plan, COEX is also focusing on a range of other types of collection points, particularly in SEQ where there are challenges in finding appropriate locations for depots. It is expected depots will remain a critical part of the network, with other refund types like RVMs, bag drops and shop fronts helping fill in key gaps (e.g. Brisbane's western suburbs, Gold and Sunshine Coasts etc). COEX reports that in the 2023-2024¹⁶ financial year there were 152 depots, 67 mobile collections, 108 bag drops, 27 RVMs and 1,009 suburbs offered a home collection service. No other Australian States have a return to retail collection model, however, this is an approach used in some European, United States of America and Canadian Schemes. The WRR Act specifies the requirements for the sale of eligible containers and claiming payment for collected containers which includes containers displaying the refund marking to ensure containers can be accounted for.
5.2	27, 28, 48, 59, 72, 90, 92	Some submissions express a view that there should be a greater role for Government and councils in making public land available for collection points , or collection from public bins or at Government buildings, or greater efforts to provide recycling at Government owned sites.	The department notes the suggestions relating to Government actions. Under the WRR Act, State entities have an obligation to prepare a waste reduction and recycling plan. These plans, and their development and review, are the responsibility of individual departments and their Chief Executive and present an opportunity for agencies to consider participation in the Scheme. The department will continue to encourage other agencies to participate in the Scheme and partner with COEX to expand collection opportunities. There are several positive examples of collections through schools and stadiums.
5.3	39, 99	Some submissions propose various Government actions , including encouraging container collection at Government sites, encouraging medium and large businesses to expand waste management	

Item	Submission No(s).	Summary of key point in submission	Department's response
		plans to collection, and including container collection in licensing requirements (event permits and hospitality industry), and revising legislation.	Participation in the Scheme is voluntary under the existing legislation. Should the inquiry make findings or recommendations about Government actions, these will be considered as part of the Government's Response and the Minister's role in exercising the requirements in the legislation.
5.4	27, 39, 45, 69, 102	Some submissions expressed a view that removing planning barriers would enable more efficient expansion and Queensland should consider alignment to other States that have planning exemptions .	The department notes the Scheme has been in place for some years and considers it is important to consider any data provided by COEX about challenges with obtaining development approvals over this period. As exchange locations have the potential for negative impacts from the intensified use such as an increase in vehicular traffic, increased noise, and loss of visual amenity, consideration is needed on the appropriate level of planning assessment. Consultation with local government would also be required to understand any impacts of existing shop fronts and RVMs and any learnings, for example, the extent of any complaints, traffic and truck movement challenges or other planning issues, if any. Further consideration of data on challenges with planning processes can be considered by Government.

Topic 6: The final processing and utilisation of recycled products, transparency and public oversight.

Item	Submission No(s).	Summary of key point in submission	Department's response
6.1	78, 79, 80, 81, 86, 95, 104	Some submissions suggested there is a distinct and clear lack of transparency regarding post-collection of containers Scheme wide. The Scheme's administration lacks visibility over the final processing of recycled materials , and there is little evidence that the materials are being used in a way that benefits Queensland or contributes to a circular economy .	The department notes concerns about the access to data from the Scheme and the impact it has on public confidence, Scheme integrity and investment decisions and the growing calls for more transparent and accessible data. Refer to the department's response above to item 3.3 in relation to data. Should the inquiry identify more reporting requirements or recommendations to increase transparency of data, these will be

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6.2	61, 103	Submissions note that data accuracy and transparency are critical to measure progress and to build community trust. To enhance transparency, regular publication of a data dashboard (sale volumes, network return volumes, and MRF return volumes) was suggested. Data accuracy and transparency could be enhanced using a number of technologies including GS1 globally recognised tracking numbers, 2D QR codes, Global Data Synchronisation Network and the National Product Catalogue. This would also allow consumers to track product lifecycle.	considered as part of the Government's Response and the Minister's role in exercising the requirements in the legislation.
6.3	36, 48, 95, 99	Multiple submissions raise concerns that recycling infrastructure capacity in Queensland and Australia limits the ability to process and recycle material into new products onshore. Several submissions propose that greater investment by the Scheme, or the Government should be made back into infrastructure in Queensland to enhance recycling capacity. One submission raises serious concerns that the PRO's financial accountability is called into question through the lack of reinvestment in improving the Scheme or advancing innovative recycling technologies.	The department notes that there are some concerns relating to the capacity of recycling infrastructure in Queensland allowing for recycling onshore. Reporting under the Scheme in the last two years identified that 100¹⁷ per cent of glass returned through the Scheme is recycled in Queensland, while 100 per cent of PET (often used in plastic bottles) is recycled domestically. The department acknowledges that 100 per cent of the aluminium and LPB collected is currently exported. To address this, in March 2023¹⁸, the then Australian and Queensland Governments announced that saveBOARD would establish its first Queensland facility on the Gold Coast, receiving \$1.7 million in funding from the Queensland Recycling Modernisation Fund (\$40 million Fund - \$20 million funding from the Australian Government and \$20 million in co-funding from the Queensland Government). There is currently no confirmed start date for building or operating the saveBOARD facility in Queensland. In addition to the Queensland Recycling Modernisation Fund, the Queensland Government \$1.1 billion ten year Recycling and Jobs Fund includes funding for councils and industry to invest in recycling infrastructure.

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6.4	71, 77	Submissions raised concerns regarding the proximity principle for recovered materials , and onshore requirements for sale of processed material. These submissions identified perceived 'loopholes' that allow for materials to be partly processed domestically before being sold internationally and are reported by the PRO as recycled onshore . PET is an example of this, where plastic is processed (flaked) and then exported.	The department notes the concerns regarding the export of materials offshore and whether the proximity principle is meeting the needs of Queensland. The Proximity principle is defined in the WRR Act and provides that waste and recovered resources should be managed as close to the source of generation as possible. The WRR Act prescribes that the achievements of the object of the Act must be guided, if practicable, by the principle and the other Waste and Resources Management Principles. Should the inquiry identify more requirements or recommendations to further define the proximity principle, these will be considered as part of the Government's Response and the Minister's role in exercising the requirements in the legislation.

Topic 7: The Scheme scope and objectives remaining fit for purpose and meeting the needs of all Queenslanders.

Item	Submission No(s).	Summary of key point in submission	Department's response
Scheme expansion			
7.1	2, 13, 24, 27, 48, 52, 61, 62, 72, 82, 88, 91, 92, 98, 107	Several submissions generally supported the previous expansion of the Scheme and proposed that the Scheme should be expanded to include other items including other beverage containers like milk containers, iced coffee, milk alternatives, cordials and juices, and other containers like glass jam jars and oil bottles. Some submissions extended this view to propose that all beverage containers be included to maximise consumer participation, and that the Scheme could expand beyond its eligible containers to include takeaway food cups, non-beverage recyclable	The department notes suggestions to include other container types in the Scheme, including milk containers, cordial bottles, glass jars etc. The Scheme is established as a product stewardship arrangement with the costs of operating the Scheme and recovering the containers for recycling paid for by beverage manufacturers. In the initial design of the Scheme, the focus was to reduce littering of beverage containers which are consumed outside of the home and more likely to end up as litter. When the Queensland Scheme was expanded in November 2023 to include wine and pure spirit containers, the wine and spirit beverage manufacturers were also included in funding the Scheme.

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		containers and reusables making greater use of the Scheme and its networks. Another submission highlighted inconsistency in the collections across the state and cited a local CRP that does not accept probiotic containers despite it containing the 10 cent refund label.	Further expansion of the Scheme to other products would require consultation with the respective manufacturers for their inclusion in, and participation in the Scheme. It should be noted that there are other programs in place to support recycling of some of these other materials, which are generally collected through yellow top bins. This includes for example the Lets Get It Sorted Partnership Program with councils, which provides funding and tools to councils to help promote recycling in local communities.
7.2	77	One submission recommended a new Scheme objective to maximise the economic value of recycled material.	The department notes the suggestion to amend the Scheme objectives. Any change to the objectives of the Scheme would require further policy consideration by Government and consideration of any financial impacts to businesses and Queenslanders. Should the inquiry make findings or recommendations about specific issues, these will be considered as part of the Government's Response and the Minister's role in exercising the requirements of the legislation.
7.3	8, 19	Some submissions suggested expanding the Scheme to allow for collection of lids to reduce litter.	The department notes the submissions which advocate for an expansion of eligible containers to include lids to reduce litter. The department understands that loose beverage container lids¹⁹ continue to be littered in high amounts, with it rating as the second most littered items in Queensland in the October 2023 and March 2024 litter audits commissioned by the department. This supports the observations made by submitters. In administering the Scheme, COEX advises lids are to be removed when containers are returned for a refund due to safety concerns. The department understands there are growing calls for lids to be returned with containers, with the New South Wales²⁰ Container Deposit Scheme allowing lids on containers to be returned through its Scheme, and the New South Wales Environment Protection Authority proposing²¹ that plastic lids be tethered to eligible bottles by the end of 2030. Such an approach is also supported internationally with the

Item	Submission No(s).	Summary of key point in submission	Department's response
			European Commission²² mandating that all caps and lids are required to remain attached to all beverage containers (tethered lids) with a capacity of up to three litres excluding metal and glass containers. Should the inquiry make findings or recommendations about specific issues, these will be considered as part of the Government's Response and the Minister's role in exercising the requirements of the legislation.
Scheme improvement opportunities			
7.4	34, 41, 50	Some submissions expressed the view that the current Scheme does not align with international best practice. Recommendations included: • International Schemes boost participation through simplified processes e.g. In Germany, no account is necessary; • recycling centres are adjacent to shopping centres; • refunds provided through shopping centre vouchers; • services to collect containers from island communities and tourist destinations. (e.g. Rottneest model of charging tourists' access which supports sustainability programs); and • efficiency could be improved if containers are compacted before transporting from collection points.	The department notes that several submissions compared the Queensland Scheme to international Schemes and suggested associated changes. The department notes that while international Schemes²³ do achieve higher recovery rates, these international Schemes operate under very different administrative arrangements, some of which are the subject of these submissions. Importantly, other differences – which are outside the power of a State based framework – include an environmental tax per unit for each beverage container as part of the European Union levy, with a scaled reduced tax rate if the beverage is included in an approved deposit Scheme, and reduced tax rates incentivising higher recovery rates. By 2029²⁴, legislation in Europe will require the European Union's member states' Container Deposit Schemes to achieve a 90 per cent recovery rate which is a significant driver of the success of these Schemes. In relation to some of the suggestions for convenient collection points at shopping centres, it is noted that a number of RVMs and shop fronts are associated with shopping centres, and this will likely continue to be an area for expansion by COEX.
7.5	4, 16, 18, 24, 28, 40, 77, 89	Several submissions suggested that the public should be educated further about recycling and waste, including the Scheme and the value of the refund.	The department notes suggestions for increased community awareness of the Scheme and, more generally, increasing education about recycling in the community. Currently, one of the functions of COEX as the PRO is to promote the Scheme. Part of the revenue collected by COEX goes towards

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			awareness raising and advertising to ensure the community is aware of how and where they can return containers. More broadly the department is working to increase recycling and reduce littering and will continue to do so through a range of policy interventions, projects, and education and behaviour change initiatives. This includes for example the Lets Get It Sorted Partnership Program with councils, which provides funding and tools to councils to help promote recycling in local communities.
7.6	3, 60	Some submissions suggested beverage manufacturers have full financial and administrative burden of container collection without regard for the environmental impact or recyclability. These submissions recommended simplifying the Scheme operation to reduce cost and argued against Scheme expansion.	The department notes the concerns from beverage manufacturers around the financial impacts on businesses from the Scheme. Refer to the department's response above to item 1.4 in relation to consultation on the Scheme and item 3.2 in relation to Scheme price. Any future changes to the Scheme would need to carefully consider the financial and non-financial impacts on beverage manufacturers, businesses and Queenslanders.
7.7	90	One submission noted COEX's partnership with Government remains crucial to improving the Scheme.	The department notes the submission and is committed to working with industry, local governments and the community to achieve its objectives of waste reduction, increased recycling and protecting the environment.

Topic 8: The appropriateness of governance arrangements, structures and expenditure including sponsorship.

Item	Submission No(s).	Summary of key point in submission	Department's response
8.1	3, 61, 83, 94, 98	Some submissions raised issues with the governance arrangements for COEX, specifically the need for increased community stakeholders and formal board representation, with the dominance of the beverage industry on the COEX board and expressed concern over the potential for conflicts of interest.	The department notes suggestions around the COEX board representation, for example that a representative of the waste industry should be on the Board and that there should be more community representation. The requirements for the Board are set out under WRR Act. Any changes to the representatives on the Board would require legislative changes, which would be a matter for the Government. It is

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			noted that it is already a requirement under the legislation that the Minister must approve the chair of the Board who is independent of the beverage industry, and another independent director to represent the interests of the community. It is acknowledged there could be benefits in representation from the waste industry given their role in processing materials, both through MRFs and other recycling facilities (e.g. glass, plastics etc).
8.2	38, 53, 60, 67, 78, 79, 80, 81, 83, 86, 91, 95, 104	Some submissions highlighted the need for transparency about COEX's strategic plan and financials , either to plan ahead or to provide accountability and transparency. Some submissions criticised the failure to release various reports and assessments of COEX's performance over the years, stating this has hindered transparency and accountability.	The department notes concerns about the access to data from the Scheme and the impact it has on public confidence, Scheme integrity and investment decisions. Refer to the department's response above to item 3.3 in relation to data. Should the inquiry identify more reporting requirements or recommendations to increase transparency of data, these will be considered a policy matter for the Government and would require comprehensive consultation and consideration of the impacts ahead of any reform.
8.3	53, 66, 83, 91	Some submission considered substandard results from the vertically integrated Scheme- and network-operator model and has led to a lower number of collection points than would otherwise be the case. Another submission suggested that Government should split these duties into separate Scheme coordinator and network-operator roles .	The department notes the submissions which address the delivery model of the Scheme. Any change to the delivery model of the Scheme amount would require further policy consideration by Government and consideration of any financial impacts to businesses and Queenslanders. Should the inquiry make findings or recommendations about specific issues, these will be considered as part of the Government's Response.
8.4	39, 48, 89	Some submissions expressed the view that the not-for-profit model delivers great value for Queensland.	The department notes these submissions. Section 102B of the WRR Act also requires the PRO to be registered under the Commonwealth <i>Corporations Act 2001</i> and be carried out as a not-for-profit organisation with a Board of the above-prescribed composition.

Topic 9: Other matters - Government and community arrangements, public education, financial arrangements, improving recycling, environmental outcomes, national and international arrangements and the Inquiry.

Item	Submission No(s).	Summary of key point in submission	Department's response
Government and community arrangements			
9.1	27, 102	Some submissions proposed local government should be more involved in the Scheme to drive participation (e.g., offering rates discounts for participants) and that a range of organisations be required to report on the containers that go through their facilities in return for a credit.	The department notes suggestions that certain businesses, organisations or Government bodies should be encouraged or required to participate in the Scheme by collecting containers or by otherwise fulfilling particular functions or duties. Refer to the department's response above to item 3.5 in relation to participation in the Scheme being voluntary.
9.2	41	One submission suggested that the return of beverage containers should be made compulsory for cafes and that there should be tax incentives for retail businesses to encourage partnership.	
9.3	102	Some submissions noted a need to partner with First Nations local leaders/organisations to offer tailored support for the Scheme.	The department notes the suggestions. As of 30 June 2024, COEX reported²⁵ that 15 of 17 First Nations councils had local access to the Scheme. However the service provided to community is primarily a mobile service that collects from multiple locations in one trip, with only two depots recently opened in New Mapoon and Yarrabah. This is not fit for purpose, or a genuine long-term solution, for these communities and the department continues to receive reports of services being cancelled or not having sufficient cash for refunds, and inadequate truck storage resulting in later communities missing out. Further the service is unable to operate during the wet season.
9.4	48, 52	Some submissions recommended that Government commit to a whole-of-government approach to the Queensland Craft Brewing Strategy: establish a clear forum for all Government departments and COEX with the independent breweries;	The department notes the matters raised in relation to the Craft Brewing Strategy. The Queensland Craft Brewing Strategy was released in 2018 and is led by the Department of Natural Resources and Mines, Manufacturing, and Regional and Rural Development.

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		- establish an exemption or rebate for small producers; - extend reporting and payment timeframes for small producers; and - commit to national harmonisation.	The Queensland Government assisted craft brewers to meet the requirements of the Scheme under Action 8 of the Craft Brewing Strategy. To support the Scheme's expansion to glass wine and pure spirit bottles in 2023, financial support was available from the department for small, Queensland-based beverage manufacturers registering their products for barcodes for the first time to meet the Scheme onboarding requirements. As of end of March 2025²⁶, 21 small beverage manufacturers requested this assistance with 769 barcodes funded by the department for \$2,967.33 (excluding GST). This funding support has now closed.
Financial arrangements			
9.5	1	One submission suggested that local governments should be benefitting from the refunds and using that money to reduce waste collection costs .	The department notes the submission. Containers that are recovered through the yellow lid recycling bin have refund arrangements shared between the CRP operator and the MRF, with council owned MRF's being provided refunds through those arrangements.
9.6	20, 50, 52, 60, 67, 71, 35	Some submissions made reference to COEX's financial arrangements and provided feedback around how the Scheme should be delivered and on the cost impacts of the current structure. Submissions also identified challenges with the standard Scheme contract complexity and the need for multiple contracts and an overarching theme about administrative inefficiency.	The department notes the comments around COEX's administration of the Scheme, its contractual arrangements and the costs of the current structure. The Scheme price charged to manufacturers, and a range of other operational matters including contracting, are the responsibility of COEX as part of their duties under WRR Act. Should the inquiry make findings or recommendations about specific issues, these will be considered as part of the Government's Response and the Minister's role in appointing the PRO.
9.7	33, 89, 90, 92	Some submissions suggested a review of the landfill levy structure would assist in ensuring that avenues for collection are maximised.	The department notes these submissions. Refer to the department's response above to item 4.4 in relation to the Queensland Waste Strategy.

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Improving recycling			
9.8	24, 39, 67, 77, 82, 89	Submissions identified a need to strengthen the local recycling industry, including in regional areas , targeting specific materials like PET and liquid paperboard, and identified the need for support to attract these businesses.	The department notes these submissions. Refer to the department's response above to item 4.4 in relation to the Queensland Waste Strategy. Also refer to item 6.3 in relation to recycling infrastructure. Also refer to item 6.4 in relation to export of materials.
9.9	40, 71, 89, 90, 102	Some submissions discussed a need to ensure that highest value recycling is taking place , and it is not downcycled or part processed for export, and recommended a landfill disposal ban , like what is in place in Germany.	
9.10	91, 102	Some submissions supported using the CRP network to co-collect other material Schemes like soft plastics .	The department notes that views on the collection of other materials at CRPs is split. The current legislative framework prescribes that the Scheme is for beverage containers but does include as an object of the Scheme to complement existing collection and recycling activities for recyclable waste. The collection of other materials at CRPs would be a matter between COEX and the operator in relation to their container recovery agreements and any restrictions on activities. It is acknowledged that the collection network provides an opportunity to support other recycling activities (e.g. batteries, soft plastics etc), however further consideration is required around how this could be facilitated.

Item	Submission No(s).	Summary of key point in submission	Department's response
Environmental outcomes			
9.11	1	One submission suggested the Scheme contributed to vehicle emissions due to the trips to and from CRPs.	The department notes the submission.
9.12	10, 16	Some submissions propose further environmental outcomes including: • a drink refill scheme; • legislate single use material packaging that can be recycled locally; and • return of soft plastic recycling.	The department notes the submission. Refer to the department's response above to item 4.4 in relation to the Queensland Waste Strategy. Refer also to 9.10 in relation to collecting other materials through CRPs (e.g. soft plastic recycling). The department is providing funding to Soft Plastics Stewardship Australia to conduct soft plastics recycling pilots across metro, regional and remote regions in Queensland. Trials have not yet commenced as there is still work required before launch, including the selection of trial sites and participating locations. The trials will consider options for collecting soft plastics through CRPs. Engagement is occurring with COEX and SPSA in relation to the trials. As part of the ban on plastic shopping bags in Queensland, there is a requirement under the WRR Act that heavy weight plastic bags must be made from a minimum of 80 per cent recycled content, verified by a recognised program or certification. This has helped support the use of recycled content domestically.
National and International arrangements			
9.13	51, 61, 77, 92, 97, 102, 103	Some submissions made strong calls for national harmonisation to reduce the administrative burden and improve efficiencies.	The department notes a number of submissions that identified opportunities to reduce administrative burden from multiple Schemes across Australia. This included suggestions for harmonising requirements across States and providing for example a single portal to register containers across States. The department is continuing to engage across jurisdictions around options for harmonisation and will assess the costs and benefits for Queensland.

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9.14	91	One submission noted that the audit methodology imposed by COEX and the Queensland Government is more cumbersome and costly than other jurisdictions for MRFs to participate in the Scheme. This submission also notes that a variation to the Recovery Amount Protocol to include containers from commercial and industrial facilities could increase the volume of containers returned through the Scheme.	The department notes the submission. The audit methodology is a component of the Recovery Amount Protocol. Concerns about the burden are noted. The department is reviewing the Recovery Amount Protocol and will consider these issues as part of the review. Amendment to the legislation to vary the scope of the Recovery Amount Protocol is a policy matter for the Government and would require comprehensive consultation and consideration of the impacts ahead of any reform.
9.15	103	One submission advocated for legislation to implement global barcodes and 2D QR codes.	The department notes the submission. Refer to the department's response above to item 9.4 in relation to barcodes.
Miscellaneous			
9.16	5	One submission suggested that additional information should be provided to customers on what items are not reimbursed.	The department notes the submission. COEX provides information a range of information on their website including about what containers are eligible for a refund; containers that are not eligible for a refund; why some containers are not eligible; the types of materials that are collected through the Scheme; the condition containers need to be in; the need for the label or barcode; and removing lids from containers.
9.17	31	One submission expressed a view that increasing beverage prices disincentivises consumption of beverages with low nutritional value.	The department notes the submission.
Inquiry			
9.18	3	One submission recommended CRP operators should be specifically consulted as part of the inquiry.	The department notes the submission. The department notes that submissions on the inquiry was open to all Queenslanders and a number of CRP operators took up the opportunity.

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- ¹ https://d3n8a8pro7vhmx.cloudfront.net/boomerangalliance/pages/3970/attachments/original/1594945276/Queensland_CRS_paper_final_170720.pdf?1594945276
- ² Based on Quarterly Performance Report for Q2 FY25 (as at end of December 2024)
- ³ [Discussion paper: Proposal to expand the scope of eligible container in Queensland's container refund scheme – Containers for Change](#)
- ⁴ <https://containerexchange.com.au/wp-content/uploads/2024/10/Container-Exchange-Annual-Report-2024.pdf>
- ⁵ APC Waste Consultants - Queensland litter monitoring program - Site assessments October 2023 and March 2024 Report
- ⁶ https://returnandearn.org.au/wp-content/uploads/2018/05/20241115-EFC-NSW-CDS-Annual-Report-2023-24_final.pdf
- ⁷ <https://vicreturn.com.au/wp-content/uploads/2024/12/VicReturn-Annual-Report-2023-24.pdf>
- ⁸ <https://containerexchange.com.au/wp-content/uploads/2024/10/Container-Exchange-Annual-Report-2024.pdf>
- ⁹ <https://www.tomra.com/reverse-vending/media-center/feature-articles/norway-deposit-return-scheme#:~:text=In%202021%2C%20Norway%20achieved%20a,the%20increase%20in%20deposit%20value>
- ¹⁰ <https://www.tomra.com/reverse-vending/media-center/feature-articles/norway-deposit-return-scheme#:~:text=In%202021%2C%20Norway%20achieved%20a,the%20increase%20in%20deposit%20value>
- ¹¹ <https://www.tomra.com/reverse-vending/media-center/feature-articles/norway-deposit-return-scheme#:~:text=In%202021%2C%20Norway%20achieved%20a,the%20increase%20in%20deposit%20value>
- ¹² <https://www.tomra.com/reverse-vending/media-center/feature-articles/norway-deposit-return-scheme#:~:text=In%202021%2C%20Norway%20achieved%20a,the%20increase%20in%20deposit%20value>
- ¹³ <https://www.tomra.com/reverse-vending/media-center/feature-articles/norway-deposit-return-scheme#:~:text=In%202021%2C%20Norway%20achieved%20a,the%20increase%20in%20deposit%20value>
- ¹⁴ <https://containerexchange.com.au/wp-content/uploads/2024/10/Container-Exchange-Annual-Report-2024.pdf>
- ¹⁵ <https://www.qgso.qld.gov.au/statistics/theme/population/population-estimates/state-territories/qld-population-counter#:~:text=The%20estimated%20resident%20population%20as,Queensland%20Government%20Statistician%27s%20Office%20website.>
- ¹⁶ <https://containerexchange.com.au/wp-content/uploads/2024/10/Container-Exchange-Annual-Report-2024.pdf>
- ¹⁷ <https://containerexchange.com.au/annual-reports/>
- ¹⁸ <https://statements.qld.gov.au/statements/97471>
- ¹⁹ APC Waste Consultants - Queensland litter monitoring program - Site assessments October 2023 and March 2024 Report
- ²⁰ <https://returnandearn.org.au/how-it-works/container-recycling/>
- ²¹ <https://yoursay.epa.nsw.gov.au/nsw-plastics-way-forward>
- ²² [Directive \(EU\) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment \(Text with EEA relevance\)](#)
- ²³ <https://www.tomra.com/reverse-vending/media-center/feature-articles/norway-deposit-return-scheme#:~:text=In%202021%2C%20Norway%20achieved%20a,the%20increase%20in%20deposit%20value>
- ²⁴ <https://www.tomra.com/reverse-vending/media-center/feature-articles/packaging-waste-regulation-ppwr-deposit-return-schemes#:~:text=The%20SUPD%20required%2077%25%20of,2029%20to%20achieve%20those%20targets.>
- ²⁵ COEX Annual Report 2024 - <https://containerexchange.com.au/wp-content/uploads/2024/10/Container-Exchange-Annual-Report-2024.pdf>
- ²⁶ Department financial systems reporting