Inquiry - Improving Queensland's Container Refund Scheme

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NationalRetail ASSOCIATION

Submission: Inquiry into Improving Queensland's Container Refund Scheme

PREPARED FOR THE QUEENSLAND PARLIAMENT HEALTH, ENVIRONMENT, AND INNOVATION COMMITTEE

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www.nationalretail.org.au

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About the National Retail Association

The National Retail Association is a not-for-profit organisation that represents the interests of retailers across Australia.

We exist to support, inform, protect, and represent the interests of retailers, manufacturers, industry and QSRs. We understand the issues and opportunities facing retailers every day.

The Australian retail sector represents over 1.2 million employees, and over $349 billion in trade. The National Retail Association represents over 75,000 stores across Australia.

The retail industry plays a huge role in Australia's economy, employment and greater livelihood and we are dedicated to helping unite retailers and stakeholders for the success of the industry now, and for the future.

Our submission on behalf of the retail sector

Over the past few years, the National Retail Association and our members have been instrumental in some of the most significant environmental changes in Australia, from over 3 billion lightweight plastic bags being prevented from consumption, to collaborating on key taskforces responsible for rolling out container deposit schemes, environmental legislation, and voluntary product stewardship schemes.

Since 2017, we have been directly engaged by the Queensland, Western Australian and Victorian state governments to broker major retailer change and manage the education of over 70,000 retailers regarding state bag ban legislation. We were also engaged by both Queensland and Western Australian governments to develop and deploy state-wide customer education and awareness campaigns supporting the introduction of each state's bag ban.

These two campaigns reached over 5 million Australians and we continue to deliver complaint handling and auditing programs across Australia to ensure retailers comply with the relevant legislation.

The National Retail Association is also an active member in key taskforces, working groups and committees, including: the Australian Packaging Covenant Organisation (APCO); SA Single-Use Plastics Industry Reference Group; WA Container Deposit Scheme Advisory Group; ACT Single-Use Plastics Industry Reference Group; VIC EPA Small Business and Manufacturing Reference Group; Battery Stewardship Council; and Industry Supporter of Moving the Needle (reduce textile waste) program.

We see our role as instrumental in bringing together stakeholders and ensuring retailer insight and perspectives are represented for positive, practical outcomes.

We welcome the opportunity to provide feedback in relation to the Inquiry into improving the Queensland Container Deposit Scheme and we support the Queensland Government's objective to reduce litter. Retailers and customers alike share the concern about the harmful impact of littering on the environment. We understand that the Government seeks to expand on the current recycling rates in Queensland.

It is important to our businesses that any expansion of CDS is implemented in a practical way which limits the cost to the business, manufacturers and ultimately customers, and critically, can provide investment certainty and continuity through national CDS harmonisation.

Currently, consumers are experiencing cost of living pressures, and businesses are facing increasing difficulty in ensuring they can maintain adequate margins. We strongly recommend that a moratorium on any costs is placed on for a minimum of three to five years. A freeze on costs, and a clear policy direction will ensure businesses, manufacturers and retailers can confidently invest in the Queensland Container Deposit Scheme.

The National Retail Association supports that despite the 22.5c container cost, and the not-for-profit model, CoEX has maintained efficiency and has seen year on year increases in return rates. Container prices have not increased for consumers, and the community, social and economic impacts can be shared by communities across Queensland. We believe this is the most appropriate model to support and we will continue to support the work of CoEx.

Terms of Reference

The current state and operation of Queensland's container refund scheme and its efficiency and effectiveness in meeting the scheme's objects as outlined in section 99H of the *Waste Reduction and Recycling Act 2011*.

Operation of the Queensland Container Refund Scheme

Meeting the Objectives of the Act

We commend the Queensland Government for achieving a 67 percent collection rate, a 49 percent increase before the Queensland Container Refund Scheme was introduced. We note that in Queensland alone, an initial goal of 307 collection points has been exceeded, with over 380 refund points now available. The National Retail Association commends the Scheme for providing a collection service in 1111 of the 1117 suburbs across Queensland. Additionally, we commend the Scheme for facilitating mobile collection opportunities to regional and remote communities across Queensland.

Critically, the ongoing and extensive work of CoEx with regional, rural and First Nations communities has ensured that return rates in these communities has reached nearly 85 percent. We note that well over 1,600 jobs have been created through the Queensland CDS, and over $16.6 million in refunds, supporting community and charity organisations.

The current Queensland CoEx model

We support that Queensland and Western Australia are the only schemes administered and operated by not-for-profit organisations, while other states rely on a mix of government and not-for profit management that relies on taxpayer funding. For-profit schemes run the risk of making decisions based on commercial and market factors, and to increase shareholder benefits. The Queensland not-for-profit model ensures that financial management and community investment remains at the forefront of CoEx's work, and ensures outreach and program delivery into regional, rural and remote communities, including many First Nations communities in Queensland.

It is critical to highlight that the forecasted average operational costs in a single month is approximately $48 million, and to buffer against potential market or business disruption, approximately four to six weeks' worth of operational costs is reserved to ensure the scheme can continuously maintain operations, should a disruption occur in future.

Critically, residual or surplus funds are re-invested to supports schools, community groups, charities and local and state government facilities to increase container uptake. This reinvestment initiative has ensured that CoEx has continued to deliver year-on-year expansion on Queensland recovery rates.

By comparison, Queensland's model recorded 67.6 percent return rate over twelve months and New South Wales recorded a return rate of 67.7 percent, despite being launch a year earlier. On a per capita basis, Queensland returns 354 containers per capita in contrast to 264 per capita for New South Wales and 328 containers per capita for Western Australia.

Despite the large land mass, transport, and logistics route, and managing operations, Queensland's 22.5c per container ensures it is the second most efficient scheme in Australia.

The National Retail Association supports that despite the 22.5c container cost, and the not-for-profit model, container prices have not increased for consumers, and the community, social and economic impacts can be shared by communities across Queensland. We believe this is the most appropriate model to support and we will continue to support the work of CoEx.

Opportunities

Research conducted by Deloitte indicates that support for government owned and operated sites to collect eligible containers and have mandates to collect CDS containers as a separate resource stream, would improve overall collection rates between 4.9 and 7.9 percent. This could be effectively implemented by legislating that government buildings e.g., hospitals, prisons, schools, aged care centres and commonwealth and state office buildings to collect, and separate eligible CDS containers. The National Retail Association recommends that the Queensland Government strongly consider compelling Material Recovery Facilities (MRF) to process eligible containers through the Container Deposit Scheme, and sort them as appropriate.

Kerbside Processing and Material Recovery Facilities (MRFs)

Material Recovery Facilities (MRFs) are eligible to claim 10c deposits for the collection of eligible CDS containers. We encourage the government to work with industry to ensure that MRFs are required to process eligible CDS containers and sort them as appropriate, given they are eligible to collect the fees. The National Retail Association supports that MRF operations would have similar obligations to the scheme coordinator and are integral in ensuring that CDS Containers remain a critical component of circular economy outcomes.

Investing in Infrastructure

Recyclable items are those that can be recycled for many rotations are preferable to those that are downcycled to road base or non-recyclable products, those solely able to be turned into compost, and those that must be landfilled. Preference should also be given to items made from recycled content which have retained their recyclability and are vital to a circular economy.

The most recyclable materials are metal, glass, rigid plastic (PET, PP and PE), and uncontaminated paper. Some items, such as soft plastics and plastic-lined paper, are recyclable in other countries but deemed conditionally recyclable until infrastructure is completed. Some items are not recyclable if they are permanently and significantly contaminated by food, such as paper and fibre-based food packaging.

We encourage the Queensland Government to streamline approval processes for Reverse Vending Machines (RVMs), increase recycling infrastructure through harmonised kerbside recycling, and increasing public space access to collection and return points, and to invest in a concerted business, and separately, consumer campaign to raise awareness of the benefits of the CDS, and recycling.

We note that glass leads with an 88 percent recovery rate, fully recycled locally into new bottles in three days, while aluminium (69.1 percent) and PET (57.1 percent) trail, with limited onshore processing capacity. We believe that enhancing domestic recycling capabilities will increase container uptake and enhance onshore recycling capabilities.

Recommended Policy Action

Support CoEx's existing model: We encourage the Queensland Government to support the existing Co-Ex model and to ensure policies support the second most efficient CDS Scheme in Australia.

Targeted Approach: Focus on high-density, low-recovery regions (e.g., Brisbane, Gold Coast) and segments (OOH, aluminium/PET containers) rather than broad initiatives.

Support Businesses: Support medium and large workplaces to treat CDS containers as a separate waste stream, introducing collection facilities. This must be accompanied by a business engagement campaign to introduce the benefits of CDS collection, and the overall economic and social contribution of CDS participation.

Mandate Collection Points at Government Sites: Encourage government-owned sites (e.g., schools, hospitals, council sites, prisons and public spaces) and mandate the collection for CDS-eligible containers separately, leveraging public and employee consumption.

Compel Material Recovery Facilities to collect and sort eligible CDS Containers: MRFs must be required to process eligible CDS containers and sort them as appropriate, given they are eligible to collect the fees. The National Retail Association supports that MRF operations would have similar obligations to the scheme coordinator and are integral in ensuring that CDS Containers remain a critical component of circular economy outcomes.

Support Container Deposit Scheme Expansion: Continue Container Exchange (COEX) plans to add 80 new sites (20 depots, 30 bag drops, 30 RVMs) beyond 2025, aligning with consumer preferences and volume targets.

Increase Public Space Collection Points: Install Container Exchange Points (e.g., baskets on public bins) in high-density, low-recovery areas like Brisbane and Sunshine Coast. Similar to the Scheme in Western Australia, this will assist in diverting more containers away from general waste bins.

Support the Hospitality, Hotel and Entertainment Sectors to increase collections: Encourage hospitality venues, hotels, and stadiums to collect CDS containers separately, managed by staff and waste collectors.

Streamline Local Government Approval processes: We note that Queensland is the only state that does not have access to planning exemptions for container refund points. We urge the Queensland Government to ensure that planning laws do not prevent CoEx from increasing container rate participation, or access to return points.

Invest in domestic recycling capabilities: There is an opportunity to invest in domestic recycling and processing capabilities, particularly with clean, food-grade plastic, aluminium, and other materials. Inevitable Federal recycled content mandates will drive the need for cleaner, domestic supply of these materials and the Queensland Government has an opportunity to process and manufacture these products onshore.

The efficiency and effectiveness of the scheme's administration by Container Exchange (Qld) Limited (COEX) as the appointed Product Responsibility Organisation under the *Waste Reduction and Recycling Act 2011*, including:

a. its progress towards achieving the container recovery rate of at least 85 per cent for each financial year.

b. the availability of refund points across Queensland to provide the community with access to a place to return empty beverage containers in exchange for a refund; and

c. the final processing and utilisation of recycled products, ensuring transparency and public oversight.

Efficiency and effectiveness of the Queensland Container Refund Scheme

Progress towards achieving the container recovery rate of at least 85 per cent for each financial year

We commend CoEx on achieving a collection rate of over 9.8 billion containers in the six years since the Queensland Container Deposit Scheme was introduced. The collection rate of over 67.7 percent has contributed to over 1,580 jobs in local Queensland communities and contributed over $16.6 million in charity and community group refunds and supported over 13 social enterprises in Queensland.

We understand that approximately 60 percent of uncollected containers come from multi-unit dwellings (MUDs) and out-of-home (OOH) consumption (e.g., workplaces, hospitality), while 40 percent are from single-unit dwellings (SUDs). We consider that efforts must be made by the Queensland Government to invest in greater collection infrastructure, including in single-unit dwellings and with bin infrastructure.

We emphasise that there are considerably lower recovery rates in workplaces (40 percent) and hospitality (50 percent) compared to single-unit dwellings (75 percent) indicate significant uplift potential.

A measured return rate is key to the success of the scheme. However, we note that there are many considerations. Success of the scheme lies with the reduction of litter, and this goal can be met with relatively low return rates.

The scheme should be allowed enough flexibility to adapt quickly and follow learnings from consumer return behaviour to maximise the scheme's effectiveness.

The availability of refund points across Queensland to provide the community with access to a place to return empty beverage containers in exchange for a refund

We note that Central Queensland exceeds 85 percent recovery, while densely populated areas such as Brisbane and Gold Coast are at 57 percent recovery, presenting the greatest opportunity due to high consumption volumes.

We encourage the Queensland Government to consider encouraging Local Governments to work closely with CoeEx in prioritising Container Exchange Points in key public spaces.

The National Retail Association supports CoEx plans to add 80 new sites (including depots, bag drops and RVMs) across Queensland. We more that CoEx has continued to expand their network of refund points across Queensland, and that this has continued to deliver year-on-year increases.

We encourage the Government to streamline efficiency, and critically, to ensure that RVM approvals at a local government level, are not impeded by inefficiency and time. It is critical that where it is supported, Reverse Vending Machines can be installed without a lengthy, heavily bureaucratic or costly process.

The final processing and utilisation of recycled products, ensuring transparency and public oversight.

We note that a review of the landfill levy structure will assist in ensuring that all avenues and incentives for collection can be maximised as much as possible. A review of the existing landfill levy structure will have a significant impact on the final processing and utilisation of recycled products. A review of local government payment arrangements will also assist in incentivising greater, and cleaner streams of collection.

Higher quality recycling feedstock will be collected by greater uptake within the hospitality sector, hotel and entertainment/sporting sectors and we encourage policies that increase the uptake of higher quality feedstock for recycling.

Under existing Container Deposit Schemes, Industry is already required to pay levies which fund both the extensive network of CDS return points and the extraction of CDS containers from traditional kerbside recycling, and have established markets for the materials, and material recovery.

We note that domestic recycling policies are critical in the final processing and utilisation of recycled products. We outline the following challenges, and recommend the Queensland Government assess the potential decisions on recycling policies including:

Export Driven Feedstock Loss: Intermediaries exploit arbitrage by exporting CDS-recovered rPET flakes (licensed) and pellets (declassified as waste since 2022), bypassing local remanufacturing. This has spiked domestic rPET prices from $100 to over $800 per tonne, with further rises expected.

Policy Misalignment: The *2021 Plastic Rules* once classified rPET pellets as regulated waste, necessitating local reprocessing. Their recent declassification—plus licensed flake exports—has fuelled mass exportation, starving domestic recyclers of supply.

Global Transparency Gap: Exported rPET lacks traceability, complicating compliance with imminent recycled content mandates and exposing Australia to counterfeit imports.

Threat to Local Industry: Domestic recyclers, like those producing food-grade rPET bottles, face insolvency without sufficient feedstock, undermining $250 million in public investment (e.g., Recycling Modernisation Fund).

Circular Economy Failure: Exporting CDS-funded rPET to single-use textiles overseas contradicts the closed-loop intent, inflating costs, and stalling sustainability progress.

Opportunities

Sovereign Capability: Securing rPET supply strengthens resilience amid global supply chain disruptions and geopolitical uncertainty, reducing reliance on imports.

Economic Upside: Retaining rPET could grow local manufacturing (e.g., $213 million rPET market by 2030), leveraging the beverage industry's full funding of CDS recovery.

Regulatory Leverage: Expanding CDS scope to other sectors wanting rPET access forces broader EPR adoption, leveling the playing field.

Supply Chain Control: Prioritising local food-grade rPET as a "national resource" aligns with tougher recycled content laws, ensuring supply for compliance.

Traceability Assurance: Implementing the Recycled Content Traceability Framework becomes feasible—exported materials cannot be tracked beyond borders, but local retention guarantees authenticity and compliance.

Invest in energy and domestic manufacturing capabilities: Similar grants or low-interest loans could scale rPET plants nationwide, in addition to soft plastics recycling hubs, and targeting regional hubs to cut transport costs.

Pair this with tax breaks for manufacturers using rPET over virgin PET, which costs around $1,500 per tonne globally but fluctuates with oil prices. Subsidies could offset the higher processing costs of recycled material, estimated at 10-20% more than virgin plastic due to sorting and cleaning.

We strongly encourage the Queensland Government to lead a national discussion, in collaboration with State and Territory counterparts to push for policies that ensure domestic manufacturing capabilities have the opportunity to expand, and specifically for these materials.

Expansion to include additional containers

The National Retail Association recommends the Queensland Government investigate options to expand the current Container Deposit and to ensure harmonisation across States and Territories before this is implemented. Currently, consumers are experiencing cost of living pressures, and businesses are facing increasing difficulty in ensuring they can maintain adequate margins. We strongly encourage the Queensland Government work alongside States and Territories, and peak bodies, industry, and business to consult on widening the scope of the Container Deposit Scheme (CDS) across Australia. This will ensure consistency for businesses and consumers.

Recommended Policy Action

We recommend that domestic policies align to support the intention to increase domestic recycled content availability, and to ensure Australian Industry can invest in, and develop domestic recycling capabilities.

Invest in local manufacturing expansion: Significant industry and commercial investment has been provided for both rPET, and soft plastics recycling. Recyclability, and traceability of recyclate are key policy initiatives, and the Department can support, and enhance stewardship schemes by incentivising, and investing in domestic recycling capabilities.

Without sufficient domestic rPET, the beverage industry—despite heavy investment in CDS and recycling infrastructure—cannot meet recycled content targets. This policy failure risks unravelling CDS's credibility as a circular economy solution, both domestically and in global negotiations like the Plastics Treaty.

rPET collected through CDS must have support to be remanufactured in Australia, ideally into rPET beverage bottles. As the only sector fully funding material recovery, beverages should have access to rPET, and to demonstrate the feasible viability of Australian Stewardship Schemes and their ability to promote domestic manufacturing and recycling opportunities. This same circumstance could apply to aluminium, however, large scale investment and policy support at a State and Federal level, is critical.

Invest more into consumer education campaigns: Any additional containers or major changes to the system should be accompanied with a largescale campaign to not only educate and raise awareness amongst consumers but to celebrate positive environmental action made by government, and industry, and empower consumers to make informed waste management decisions.

Any additional changes to the Container Deposit Scheme must be accompanied by a high level of awareness among the public and 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, to ensure consumers are aware of any potential changes under the expansion, and to encourage increased uptake over a consistent period.

Whether the scope and objectives of the scheme remain fit for purpose and meet the needs of all Queenslanders, noting the Queensland government's ongoing support for the scheme.

Scope and Objectives of the Scheme

The *Waste Reduction and Recycling Act 2011*, as outlined in Section 99H, establishes clear objectives for Queensland's Beverage Container Refund Scheme, aiming to enhance environmental sustainability and social benefits through a structured recycling program.

A primary goal is to increase the recovery and recycling of empty beverage containers while reducing litter and landfill waste *(Sections 99H(a) and (b)* and CoEx has made significant strides in this area, achieving a 67.7 percent recovery rate as of February 2025, and diverting over 11.5 billion containers from landfills since its inception in 2018.

Additionally, the scheme has reduced beverage container litter by over 67 percent since its inception, demonstrating its effectiveness in minimising environmental harm and promoting a greater recycling behaviour in Queensland.

Another key objective of the Act is to ensure manufacturers of beverage products take responsibility for their products' lifecycle and to provide opportunities for social enterprises and community organisations through refund payments and employment in collection, sorting, and processing activities *(Sections 99H(c) and (d))*.

CoEx's not-for-profit model aligns with this whereby beverage manufacturers fund the scheme through an average fee of 13.3 cents per container sold, which covers refunds and operations without government funding.

As noted previously, the Scheme has also created 1,580 local jobs and supported 13 social enterprises, such as Substation33 in Logan, which processed 4.6 million containers while providing employment for young people, and IMPACT Community Services in Bundaberg, offering opportunities for individuals with diverse abilities. Over $16.6 million in donations to 2,590 registered charities further underscores the community benefits.

Finally, the Act seeks to complement existing collection and recycling activities, such as local government kerbside waste services, ensuring a cohesive waste management system *(Section 99H(e))*. Over 1.7 billion of the 11.5 billion containers recovered since 2018 have been as a result through kerbside collection. We believe that MRFs must be compelled to process and sort eligible CDS containers, and this will result in even higher container collection rates. Partnerships with local councils and commercial entities, including 966 education facilities and 392 multi-unit dwellings, have boosted participation, with commercial partner return volumes doubling to 136 percent growth year-on-year from 2023 to 2024.

By expanding refund points to 383 locations and offering diverse return options like mobile collections and 24-hour bag drops, CoEx ensures accessibility across urban and remote areas, complementing existing systems and advancing Queensland's sustainability and environmental goals.

We believe that under the existing Scheme, the scope and Objectives of the Act have, and continue to exceed expectations. As mentioned previously, we believe that greater return rates can be achieved with more support for CoEx and industry.

Ensuring the appropriateness of governance arrangements, structures, and expenditure (including sponsorship).

Governance Arrangements, Structures and Expenditure

Sponsorship

The National Retail Association strongly supports the Scheme receiving community, or private sector sponsorship, where possible, to provide the public with greater access to collection and return points, to increase awareness, and to promote the beneficial outcomes of the Queensland Container Deposit Scheme. Public Awareness campaigns are critical in promoting positive recycling behaviour, and therefore, we do not believe that sponsorship should be prohibited. We note that CoEX provides reports on the streams of income, and the outgoing costs attributed to higher return rates, and investing in infrastructure.

Structures and Governance

CoEX operates as a not-for-profit entity structured as a member-based company limited by guarantee. We support that the model consists of a nine-member board of non-executive directors, blending independent voices with industry representatives who bring diverse expertise across multiple fields, ensuring robust oversight of an organisation like COEX.

The Queensland Government plays a key role by approving the Chair and Community Director appointments, reinforcing accountability. COEX maintains transparency through regular reporting, delivering monthly and quarterly updates to the Minister for the Environment and Tourism, Science, and Innovation, as well as the Department, detailing strategic progress, operational performance, and target outcomes. Financially, COEX functions as a Product Responsibility Organisation, sustained entirely by industry contributions rather than taxpayer funds.

The National Retail Association supports this structure, and the transparency available to the Minister, Department, and key stakeholders.

Recommended Policy Action

The National Retail Association notes that COEX is industry-funded, with beverage manufacturers paying 13.3 cents per container sold to cover refunds and operations. Raising the refund could nearly double this cost, likely passed onto consumers or borne directly by businesses and manufacturers. We do not believe that the Queensland Government should consider an increase in the price of containers. Additionally, we note that large jumps in scheme costs ripple through the beverage industry, potentially raising retail prices and disproportionately affecting low-income Queenslanders who rely on affordable beverages.

Any other relevant matters.

Risks for Industry

A Container Deposit Scheme that seeks to apportion costs on businesses and industry for a small percentage of consumer litter is a last resort; it is a blunt policy tool.

In addition, any changes to the CDS must consider the impact borne by consumers, and particularly in the current economic environment where more community members are experiencing financial difficulties, food insecurity, and navigating the impact of inflation. However, if the CDS is expanded, we hope that there are several considerations that are kept in mind during implementation to reduce retailer burden and address the impact of drink container misuse.

The National Retail Association commends the Queensland Government for adopting a state-based approach to a national issue and applauds them for making the bans as consistent as possible to address the needs of national retailers.

It is important that the costs of the Container Deposit Scheme, including any administrative costs and handling fees are kept to a minimum to mitigate the impact on household budgets.

Food retailing is a high volume/low margin business and as such products attract an extremely thin margin, there is simply not enough scope to absorb the cost increase associated with the implementation of such a scheme.

Many small businesses, especially in the retail sector, may not have a presence in other states. It is important that these businesses do not have to absorb costs via a container price increase, and therefore, we strongly encourage that higher prices are ruled out of future policy decisions, for a minimum three-to-five-year period.

A freeze on costs, and a clear policy direction will ensure businesses, manufacturers and retailers can confidently invest in the Queensland Container Deposit Scheme.

Collection and processing fees

Economic modelling indicates that an increase in refunds for consumers is not an effective mechanism in driving increased consumer return rates. We note that manufacturers are required to pay over 13.3 cents per container sold, and that the program does not require funding from government. We commend that this scheme is managed entirely by Industry and that the costs associated with collection and processing are as a result of freight, processing, operational costs, and logistics.

It is critical with all Container Deposit Schemes that a minimum financial threshold is reserved to ensure that supply chain disruptions, operational and logistics barriers, and increasing external costs do not negatively impact Schemes, and do not disrupt their market operations. We believe that sustainable cash reserves are essential to absorb any interruptions on the Scheme, and to ensure that customers, manufacturers, and businesses are protected against volatile price variations or disruptions beyond the control of the Scheme.

Conclusion

The National Retail Association strongly encourages the Queensland Government to consult further with industry on opportunities to expand on the current work of CoEx, and to compliment the return rate of above 67 percent. We look forward to continued engagement with the Queensland Government.

Should you have any questions or wish to discuss this submission, please do not hesitate to contact David Stout at [redacted] or Bonnie Marshall at [redacted]