

# Waste Reduction and Recycling (Strengthening the Container Refund Scheme) Amendment Bill 2026

**Submission No:** 006

**Submission By:** Canefields Distillery

**Publication:**

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12 April 2026

Health, Environment and Innovation Committee  
Queensland Parliament  
Brisbane QLD 4000  
Sent via email: heic@parliament.qld.gov.au

**Submission – Waste Reduction and Recycling (Strengthening the Container Refund Scheme) Amendment Bill 2026**

Dear Committee Members,

I write this submission on behalf of Canefields Distillery - a small, farm-based distillery located on the Sunshine Coast, to provide a submission regarding the *Waste Reduction and Recycling (Strengthening the Container Refund Scheme) Amendment Bill 2026* (the Bill).

**Position**

Canefields Distillery does not support the Bill in its current form.

While we acknowledge the intent to improve governance and oversight of the Container Refund Scheme (CRS), the proposed amendments do not address the fundamental structural issues affecting small producers. These issues are outlined in detail in our previous correspondence to the Minister (attached) and remain unresolved.

**Key Issues Affecting Canefields Distillery**

**1. Disproportionate Regulatory Burden**

Canefields Distillery currently produces fewer than 1-2,000 bottles annually, yet is subject to the same CRS compliance framework as large-scale beverage manufacturers. This includes registration, reporting, barcode requirements and per-container fees.

This “one-size-fits-all” approach results in significant administrative and financial burden with negligible environmental benefit, particularly for micro-scale operations.

**2. Failure to Achieve Scheme Objectives**

The CRS is not effectively delivering on its stated objectives of recovery and recycling:

- Recovery targets have not been achieved
- A significant proportion of spirit bottles are never returned through the scheme
- Many products are consumed outside Queensland and cannot be recovered (Canefields Distillery is near the Sunshine Coast airport and many of our visitors are interstate tourists who take a souvenir bottle home).

For small distillers, this means paying into a system that does not capture or recycle our containers, undermining both fairness and environmental intent.

**3. Lack of Financial Transparency**

There is limited transparency regarding:

- The gap between producer contributions and consumer refunds
- The allocation of unredeemed funds
- Overall scheme expenditure and outcomes

This raises concerns regarding accountability and efficient use of funds collected from industry. Surplus funds should go towards small distillers as grants to help redesign labels and bear the financial costs of government over-regulation.

#### **4. Misalignment with Environmental Outcomes**

Artisan spirit bottles are typically:

- High-value and low-litter
- Retained, reused or repurposed by consumers (many of our customers display the bottle artwork in plants post-consumption)

Further, Canefields Distillery already undertakes or is planning:

- Bottle reuse and recycling practices
- Closed-loop initiatives at our distillery
- Exploration of refillable and alternative packaging models

The current scheme does not recognise or incentivise these practices, and instead discourages innovation.

#### **5. Lack of Exemption or Scaled Pathway**

There is currently no exemption or reduced compliance pathway for low-volume producers, despite:

- Minimal environmental impact
- Limited administrative capacity
- Existing sustainable practices

This places small producers at a competitive and operational disadvantage.

#### **Recommendations**

To ensure the scheme is equitable, effective and aligned with its objectives, we recommend:

- Introduction of a low-volume exemption threshold (e.g. <5,000 containers per annum)
- Recognition of closed-loop and reuse systems as compliant alternatives
- Improved financial transparency, including independent auditing of scheme funds
- Governance reform, including representation for small producers
- Investment of surplus funds into local recycling and packaging innovation, grants and rebates

#### **Conclusion**

Canefields Distillery supports the intent of waste reduction policy. However, in its current form, the CRS:

- Imposes disproportionate burdens on micro-producers
- Fails to deliver measurable environmental outcomes for our sector
- Lacks transparency and accountability
- Discourages sustainable innovation

**The Bill does not adequately address the underlying structural issues** impacting small businesses. We respectfully request that the Committee consider amendments to ensure the scheme is fair, proportionate, and genuinely effective. I welcome the opportunity to further discuss this matter with your office and am happy to meet with relevant officials.

Thank you for your time and consideration.

Kind regards,



**Luke Farrelly**

Part Owner and General Manager | **Canefields Distillery**  
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**29 July 2025**

Attn: The Hon Andrew Powell MP  
Minister for the Environment and Tourism  
GPO Box 2454  
Brisbane QLD 4001  
Email: [environment@ministerial.qld.gov.au](mailto:environment@ministerial.qld.gov.au)

Cc: The Anthony (Tony) Perrett MP  
Minister for Primary Industries  
Email: [primaryindustries@ministerial.qld.gov.au](mailto:primaryindustries@ministerial.qld.gov.au)

**RE: Request for Exemption from Container Refund Scheme (CRS) Obligations for Small/ Micro Volume Distilleries**

Dear Minister Powell,  
Cc Minister Tony,

I write to respectfully request your urgent consideration of an exemption or threshold relief for small, independent distilleries like ours under the Queensland Container Refund Scheme.

Our distillery, Canefields Distillery, is a micro-scale operation based on the Sunshine Coast. We are a primary producer (sugarcane farm) pursuing highest and best use of our crop since the Moreton Mill closed in Nambour in 2003 (and the local Sugarcane industry unfortunately ceased). We sold fewer than 500 bottles of our sugarcane spirit in the last 12 months, and we operate the business part-time while working in full-time employment in our primary careers. As a small-batch, locally owned producer, our contribution to container volume is minuscule — yet the compliance burden of the CRS is significant and disproportionate to our scale.

Specifically, we raise the following concerns:

- **Disproportionate Regulatory Burden:** The scheme imposes the same complex obligations on a distillery selling 300,000 bottles per year as it does on one selling fewer than 500. This includes formal registration, barcode registration, Container Recovery Agreement (CRA) execution, reporting, and per-container scheme costs, despite our negligible environmental impact. We don't have staff to handle this and we have to do it all on our own, on-top of the already burdensome Federal, State, and Local government administrative requirements (excise, licensing, town planning etc.).

- **Pre-Printed Labels:** Our product labels were professionally printed prior to the scheme's expansion to include glass spirit bottles in November 2023. Reprinting these labels presents a significant financial and environmental cost, especially for a business of our scale.

- **Existing Responsible Practices Ignored:** As a farm our goal is a whole-of-cycle recycling approach. We already accept bottle returns from customers and responsibly recycle them. At our own bar, we reuse and repurpose our tasting room bottles, minimising waste through internal lifecycle recycling. We are also exploring re-usable copper bottles with on-site refill programs for local customers (like breweries offer

'Growler' refill) — a forward-thinking, circular model that goes well beyond compliance. Unfortunately, the current scheme does not accommodate or recognise these types of sustainable, closed-loop initiatives. In fact, it discourages innovation and more ambitious environmental practices by forcing small operators like us to conform to a 'one-size-fits-all' regulatory model designed around high-volume, single-use production.

**- No Transitional Support:** Unlike large beverage manufacturers, we have no access to administrative assistance, outreach, or financial relief to meet these new obligations. There is no low-volume carve-out or exemption pathway — a contrast to other sectors where sensible small business thresholds apply.

Given the above, I respectfully request that the scheme be amended to allow a threshold exemption for producers selling fewer than 5,000 containers annually, or alternatively, a conditional exemption subject to basic environmental outcomes (e.g. verified bottle re-use, return systems, or closed-loop initiatives). In the interim, I request a reply letter from your office granting Canefields Distillery an exemption based on the grounds above.

Our business shares the environmental goals of the scheme and is actively contributing to a more sustainable, low-waste beverage industry. However, the current approach penalises small innovators and diverts resources from genuine environmental outcomes toward complex administrative compliance. We aren't asking for any hand-outs, just for the government to stop strangling us with red tape and legislation that isn't fit for purpose — we have an exciting business model but we don't know how long we can operate in this environment.

I welcome the opportunity to further discuss this matter with your office and am happy to meet with relevant officials.

Thank you for your time and consideration.

Kind regards,



**Luke Farrelly**

Part Owner and General Manager | **Canefields Distillery**  
33 Finland Road, Pacific Paradise, QLD 4564



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