

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

Submission No: 007

Submission By: Tan Lines Distilling

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

To: Health, Environment and Innovation Committee, Queensland Parliament

From: Aaron Rieniets, Owner – Tan Lines Distilling PTY LTD (Owner approval)

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Willing to appear: Yes — happy to appear as a witness if invited

Executive Summary (1 sentence)

Tan Lines Distilling PTY LTD supports the Bill's governance and transparency objectives but does not support it in its current form unless the Act is amended to create a statutory small beverage manufacturer—micro category providing an automatic fee exemption for the first 50,000 eligible containers supplied in Queensland per financial year and replacing monthly reporting with a single annual declaration, complemented by a micro-category grants stream through the governance and investment plan.

1. About Tan Lines Distilling PTY LTD

Tan Lines Distilling is a micro craft-spirits producer based in Townsville, North Queensland, bottling approximately 2,500 bottles annually.

Our sales are predominantly within Queensland (~99% QLD / ~1% national) and are primarily through local venues (bars/restaurants ~79%), plus markets/events (~15%), cellar door (~5%), and local bottle shops (~1%).

2. Position

Tan Lines Distilling PTY LTD does not support the Bill in its current form.

However, we support the Bill's objective to strengthen governance, transparency and accountability of Queensland's Container Refund Scheme (CRS), including:

- stronger oversight mechanisms for the Product Responsibility Organisation (PRO), including audits and performance tools
- board reforms to ensure greater independence and relevant expertise
- improved transparency, including publication of plans and the development of a governance and investment plan for surplus/retained scheme funds
- development of a network of container refund points plan that supports expansion while considering impacts on the existing network and viability

Our concern is that small beverage manufacturers at micro scale face fixed cost and compliance burdens that do not scale down with volume. The Bill must provide certain, automatic relief for small beverage manufacturers through clear statutory settings, consistent with its stated intent to consider pricing impacts and enable exemptions for small manufacturers.

Request to the Committee: Tan Lines Distilling PTY LTD respectfully requests that the Committee recommend in its report that the Bill be amended to establish a statutory small beverage manufacturer—micro category that provides: (1) an automatic exemption from scheme contributions/fees for the first 50,000 eligible containers supplied in Queensland per financial year; and (2) statutory reporting relief by replacing monthly reporting with a single annual declaration for micro-category manufacturers.

3. Key issue: disproportionate burden on micro-scale producers

Despite micro-scale production, Tan Lines is required to undertake monthly CRS reporting (containers supplied) and maintain records to support that reporting. This creates a fixed compliance load that does not scale down with low volumes and consumes approximately 4 hours per month of owner time.

Further, small distillers already navigate multiple regulatory reporting and record-keeping requirements (including liquor regulation reporting). Reducing avoidable duplication is a practical way to improve compliance outcomes without weakening scheme integrity.

4. Environmental outcomes: premium spirits glass behaves differently in practice

Tan Lines' real-world experience is that premium spirits glass bottles are frequently collected and reused and have a longer life cycle than many single-use beverage formats.

We can evidence this behaviour locally:

- A local venue returns ~50 Tan Lines bottles per month in bulk, indicating routine collection and consolidation rather than individual disposal.
- At our cellar door, customers return approximately 10 bottles per week.

- Of bottles returned to our cellar door, approximately 90% are reused for refilling after inspection (damage/contamination checks), with approximately 10% recycled where reuse is not appropriate.

These outcomes demonstrate that micro distillers can already be delivering circular outcomes, and regulation should be proportionate to scale and real-world impact.

5. Recommendations (targeted amendments / statutory safeguards)

Recommendation (Committee action) — Prioritise the micro category in the Committee’s report

The Committee should explicitly recommend in its report that the Bill be amended to establish a statutory small beverage manufacturer—micro category that:

- provides an automatic exemption from scheme contributions/fees for the first 50,000 eligible containers supplied in Queensland in a financial year; and
- replaces monthly reporting with a single annual declaration stating the total number of eligible containers supplied in Queensland in that financial year (with records retained and produced only if requested for audit/verification).

Recommendation 1 — Insert statutory “small beverage manufacturer—micro category” threshold in the Act (fees relief)

Amend the Waste Reduction and Recycling Act 2011 (as amended by the Bill) to define a small beverage manufacturer—micro category as a manufacturer that supplies ≤50,000 eligible containers in Queensland in a financial year, and to provide an automatic exemption from scheme contributions/fees for the first 50,000 eligible containers supplied in Queensland in that financial year.

This threshold must be expressly set in the Act (not left to regulation or administrative settings) to ensure certainty and prevent future dilution.

Recommendation 2 — Insert statutory reporting relief for the “micro category” (annual declaration replaces monthly reporting)

Amend the Act to provide that small beverage manufacturers in the micro category (≤50,000 eligible containers supplied in Queensland per financial year) are not required to submit monthly CRS reporting.

Instead, require only a single annual declaration stating the total number of eligible containers supplied in Queensland in that financial year, with supporting records retained and produced only if requested for audit/verification.

This preserves scheme integrity while eliminating disproportionate red tape for micro-scale manufacturers, and also helps reduce unnecessary duplication across existing regulatory reporting obligations.

Recommendation 3 — Require a micro-category grants stream via the governance & investment plan (application-based, capped)

The Bill requires a governance and investment plan addressing the investment and allocation of surplus and retained scheme funds.

That plan should be required to include a dedicated micro-category support stream, funded from surplus/retained scheme funds, providing application-based direct grants to eligible micro-category manufacturers to offset compliance overhead (owner time, bookkeeping/admin systems, and accountant costs), capped at \$1,000 per micro-category manufacturer per financial year.

To ensure transparency and accountability, the plan should specify eligibility criteria, a simple application process, annual budget allocation, and reporting of outcomes.

6. Conclusion

Tan Lines Distilling PTY LTD supports the Bill's core direction to restore integrity and confidence in the CRS through stronger governance, oversight, transparency, and network planning.

However, we do not support the Bill in its current form because micro-scale manufacturers need guaranteed, proportionate relief in the two areas that impose fixed burdens regardless of scale: fees and reporting.

Accordingly, we respectfully request that the Committee recommend in its report that the Act be amended to: (1) exempt the first 50,000 eligible containers supplied in Queensland per financial year from scheme contributions/fees (statutory); (2) replace monthly reporting with an annual single-number declaration for the small beverage manufacturer—micro category (statutory); and that the governance & investment plan include an application-based micro-category grant capped at \$1,000 per year funded from surplus/retained scheme funds.

Tan Lines is willing to appear as a witness if invited by the Committee.