

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

Submission No: 008

Submission By: Queensland Distillers Association

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The Committee Secretary
Health, Environment and Innovation Committee
Queensland Parliament
Brisbane Qld 4000
Via email: heic@parliament.qld.gov.au



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

Dear Committee Members,

Thank you for the opportunity to provide a submission on the Waste Reduction and Recycling (Strengthening the Container Refund Scheme) Amendment Bill 2026.

I write in my capacity as President of the Queensland Distillers Association (QDA). This submission is made on behalf of the QDA. The QDA is the peak body representing Queensland's independent distilling sector.

Position

The QDA supports the intent of the Bill and welcomes the Queensland Government's efforts to strengthen the governance, transparency and accountability of Queensland's Container Refund Scheme.

The QDA acknowledges that the Bill is directed toward improving the oversight and governance of the Scheme, including through stronger board oversight, greater independence, enhanced reporting, and specific consideration of the impacts on small beverage manufacturers. These are positive reforms and provide an important foundation for a stronger, fairer and more accountable scheme.

However, the QDA submits that the Bill should be strengthened further to ensure that the practical realities facing small beverage manufacturers are properly reflected in the governance and operation of the Scheme.

The QDA welcomes the Bill's intent to improve transparency, accountability and fairness in the operation of the Scheme. In particular, the QDA supports reforms aimed at strengthening board oversight, improving public confidence in the administration of the Scheme, and ensuring that the Product Responsibility Organisation operates in a way that is fair and non-discriminatory in its dealings with participants.

Board Representation

The QDA believes the COEX board would be strengthened by direct representation from both key cohorts of Queensland's independent beverage manufacturing sector:

- a representative from the executive of the Queensland Distillers Association; and
- a representative from the executive of the peak body representing independent brewers.

This is not sought as a matter of sector preference, but as a matter of sound governance. Independent distillers and independent brewers each face distinct but overlapping regulatory, administrative and commercial constraints as small beverage manufacturers. Board-level insight from both sectors would materially strengthen the Scheme's decision-making.

An executive committee member or office bearer brings more than general industry affiliation. They bring current exposure to sector-wide member concerns, direct accountability to the businesses they represent, active involvement in policy and compliance issues, and a broader perspective than that of an individual business alone.

Drawing these representatives from the current executive of their respective peak bodies would support stronger accountability, more consistent sector communication, and more informed representation of the operational realities facing small beverage manufacturers.

For this reason, the QDA considers that the most effective model would be:

- one current QDA executive representative for the independent distilling sector, and
- one current executive representative of the peak body for independent brewers for the brewing sector.

Small Manufacturer Relief

The QDA welcomes the Bill's recognition that small beverage manufacturers require specific consideration within the Scheme. The Bill enables an exemption, to be prescribed by regulation, for small beverage manufacturers from paying a contribution for a certain number of containers manufactured. The QDA is not seeking an increase to the refund amount paid to consumers. Rather, the QDA recommends that the associated regulation provide more meaningful relief for small beverage manufacturers by increasing the proposed exemption threshold from 20,000 containers to at least 50,000 containers, or alternatively by adopting a tiered model that better reflects the realities of small-scale beverage manufacturing.

Any relief framework should be clear, proportionate, simple to administer, and developed in consultation with affected small beverage manufacturers so that relief recognised in principle also delivers meaningful benefit in practice.

Constructive Ongoing Engagement

The Queensland distilling industry is a growing, innovative and regionally significant sector. QDA is committed to working constructively with the Queensland Government, COEX and other stakeholders to ensure the Container Refund Scheme delivers strong environmental outcomes while remaining practical, fair and proportionate for small beverage manufacturers.

The recommendations in this submission are offered in that spirit. The QDA supports the direction of reform and seeks targeted strengthening of the governance and relief framework so that the Scheme better reflects the practical realities faced by independent producers across Queensland.

Recommendations:

1. Support the Bill in principle as a positive step toward improved governance, transparency and accountability of the Container Refund Scheme.
2. Strengthen the board composition provisions so that the COEX board includes one director drawn from the current executive of the Queensland Distillers Association and one director drawn from the current executive of the peak body representing independent brewers.
3. Recognise that independent distillers and independent brewers each provide distinct and valuable operational insight into the constraints faced by small beverage manufacturers, and that both perspectives should be reflected at board level.
4. Implement the small beverage manufacturer relief framework in a practical, proportionate and accessible way, and set the exemption threshold at a level that delivers genuine operational relief for independent producers, including consideration of a threshold of at least 50,000 containers or a tiered model developed in consultation with industry.
5. Undertake ongoing consultation with representative bodies for independent distillers and independent brewers in finalising the regulatory settings and future operation of the Scheme.

Conclusion

The QDA supports the Queensland Government's objective of strengthening the governance and oversight of the Container Refund Scheme. The Bill is a positive step and contains welcome reforms, particularly in relation to board oversight, transparency and recognition of the need for relief for small beverage manufacturers.

However, the governance model will be stronger, fairer and more effective if it includes direct executive representation from both the independent distilling and independent brewing sectors, together with a more meaningful relief threshold for small producers.

The QDA would welcome the opportunity to engage further with the Committee and the Queensland Government on the matters raised in this submission, is available for further consultation or to appear if invited, and is content for this submission to be published.

Yours sincerely,



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