

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

Submission No: 009

Submission By: Crime and Corruption Commission

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Our Reference: [REDACTED]
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14 April 2026

Committee Secretary
Health, Environment and Innovation Committee
Parliament House
George Street
BRISBANE QLD 4000

Via email: HEIC@parliament.qld.gov.au

Dear Committee Secretary,

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

The Crime and Corruption Commission (“the CCC”) welcomes the opportunity to provide a submission to the Health, Environment and Innovation Committee (“the Committee”) on the *Waste Reduction and Recycling (Strengthening the Container Refund Scheme) Amendment Bill 2026* (“the Bill”).

The CCC notes that the primary objective of the Bill is to improve oversight and governance arrangements of Queensland’s Container Refund Scheme (“the Scheme”), specifically by amending the *Waste Reduction and Recycling Act 2011* (“WRR Act”) to enhance oversight mechanisms and arrangements, improve governance and accountability and increase transparency of the Scheme.

The CCC is supportive of the Bill, which intends to strengthen governance and oversight mechanisms of the Product Responsibility Organisation (“PRO”) aimed towards the prevention and early identification of corrupt conduct.

Section 102AO of the Bill confirms that the PRO is a unit of public administration (“UPA”) for the purpose of the *Crime and Corruption Act 2001* (“CC Act”), to the extent that the PRO is performing a function of the PRO. This amendment will put beyond doubt that the PRO is within the CCC’s jurisdiction.¹

¹ The Committee’s Report ‘Improving Queensland’s Container Refund Scheme’ tabled on 16 October 2025 identified that, because of the somewhat novel statutory construction of the PRO under the WRR Act, it was not immediately evident whether Container Exchange (COEX) was a UPA for the purposes of the CC Act (page 61).

To this end, it is noted that the Bill does not include a transitional period or a retrospective provision in relation to the designation of the UPA status. The CCC submits that a declaration that the PRO has always been a UPA for the purposes of the CC Act, to the extent the PRO was performing a function of the PRO, would put any ambiguity about this beyond doubt and would ensure that any suspected corrupt conduct of the PRO, prior to the commencement of the amendments, could be appropriately assessed and/or investigated by the CCC.

The CCC submits that such a declaration may be drafted in terms similar to section 384(2) of the CC Act, which declared that *“every local government and joint local government has always been and... continued to be a unit of public administration for this Act.”* It is suggested that the following wording may be inserted into new s 102AO of the Bill:

To remove any doubt, it is declared that the Organisation has always been a unit of public administration under the Crime and Corruption Act 2001, section 20(1), to the extent the Organisation is performing a function of the Organisation.

I confirm this submission is suitable for publication.

Yours sincerely

A solid black rectangular box redacting the signature of Bruce Barbour.

Bruce Barbour
Chairperson