

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

**Submission No:** 019

**Submission By:** Waste Recycling Industry Queensland (WRIQ)

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Health, Environment and Innovation Committee  
Queensland Parliament  
2A George Streets  
BRISBANE QLD 4000  
Via email: [HEIC@parliament.qld.gov.au](mailto:HEIC@parliament.qld.gov.au)

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

Dear Mr Molhoek,

Waste Recycling Industry Queensland (WRIQ) welcomes the opportunity to provide a submission on the *Waste Reduction and Recycling (Strengthening the Container Refund Scheme) Amendment Bill 2026*. WRIQ represents more than 100 Queensland waste recycling businesses, ranging from multinational operators to small, family-owned businesses, that deliver essential services to every community in the State. Our members manage 97% of Queensland's waste collections, support 16,000 jobs, contribute \$2.7 billion to Gross State Product, and own and operate \$3.8 billion of essential waste recycling infrastructure in Queensland.

This Bill represents an extraordinary body of work by the Queensland Government in a short period of time. Following the Parliamentary Inquiry, the speed and seriousness with which the Government has translated recommendations into legislation should be recognised. The majority of the reforms put forward reflect what industry has been asking for and provide a strong platform for the next phase of the scheme.

***Strategic Industry Alignment: A unified roadmap for reform***

At the same time, WRIQ and COEX have done the hard work to reset the relationship between our organisations and move beyond the tensions that characterised the earlier stages of the scheme. That work is now being formalised through a Memorandum of Understanding. The unified position reached by our two organisations has enabled a breakthrough consensus on complex issues originally slated for a subsequent round of reforms. With no second tranche of reform planned, we seek the Committee's help to secure these negotiated gains now—creating a stable, long-term legacy for the sector that is not dependent on individual tenures.

## ***Critical Omissions: Ensuring a comprehensive reform package***

WRIQ is broadly supportive of the Bill, however if there is not going to be a second tranche of legislative changes as originally planned there are some critical omissions that should be included to ensure all the Parliamentary Inquiry recommendations are addressed:

### **1. Recommendation 7 - Independent Complaints Handling Body**

**Recommended amendment:** Amend the Bill to formally recognise and require an independent dispute resolution body for the container refund scheme, building on the model currently being established by industry.

**Rationale:** A scheme of this size cannot rely on internal processes alone when relationships break down. Operators need somewhere independent to go when decisions affect their business, their contracts or their ability to continue operating within the scheme. Following the removal of an independent body from the original draft Bill, WRIQ and COEX are currently finalising an MOU to establish an independent dispute resolution service run by WRIQ that provides a fair, transparent and fast-tracked mediation and adjudication process for scheme participants. This includes a neutral secretariat, independent governance arrangements and an expert panel to ensure decisions are made at arm's length from both organisations.

This work represents a significant step forward in addressing long-standing industry concerns and a historic level of collaboration between our organisations. However, without formal recognition in the legislative framework, there is a real risk that these arrangements will rely on the commitment of current leadership and may not endure over time. If this is not embedded in the Bill, progress already made could be lost and the scheme risks returning to the same disputes and uncertainty that have previously undermined confidence across the sector.

### **2. Recommendations 8 & 11 – Scheme KPIs**

**Recommended amendment:** Amend the Bill to add additional KPIs for the scheme including annual scheme volume growth indexed to Queensland population growth, 95% scheme awareness among Queenslanders and scheme investments in Queensland waste recycling infrastructure. These targets should be refined prior to debate of the Bill in August.

**Rationale:** Without an increase to the container refund price which has unfortunately been ruled out by the current Government, it will not be possible for the scheme to achieve the 85% target set out in the current legislation. Inclusion of additional KPIs in the legislation will ensure different ways to incentivise scheme performance and create a more collaborative partnership between industry operators and the scheme.

### 3. Recommendation 13 - Integration Within Broader Policy Settings and National Harmonisation

**Recommended amendment:** Include a principle within the Bill, or consider adjusting the title of the Bill, to recognise that this upgraded container refund scheme is intended to provide a foundation for future product stewardship arrangements and that the legislative framework should be adaptable enough to support additional schemes, including for priority materials such as lithium batteries. The principle should also recognise the importance of nationally consistent approaches across key scheme design elements, including eligible scope, refund settings, labelling, public education and reporting.

**Rationale:** This Bill is not just about bottles and cans. It is creating model rules for how Queensland approaches product stewardship more broadly, and that matters because the next big challenge is already here. The waste and recycling sector is being asked to carry the cost and risk of hazardous products like lithium batteries without a proper producer-funded system behind it. The Federal Government has failed to act and Queensland communities and businesses are already paying the price for a system that was never designed to deal with this risk, with more than 12,000 lithium battery fires occurring across the industry each year. These fires are not confined to facilities; they are an escalating risk to workers, critical infrastructure and the broader community.

If this framework is going to set a baseline for what comes next, it must be built with enough ambition to respond to these emerging risks while remaining clear and consistent across jurisdictions. Queensland is building a strong system with these changes, but we should not be building a system that becomes more fragmented, more expensive and harder for the public to understand over time. A framework that is both adaptable and aligned nationally will provide a stronger foundation for future stewardship schemes and better outcomes for industry, government and community.

### 4. Recommendation 18 - Mandated Investment and Support Initiatives for Recycling Capacity

**Recommended amendment:** Amend the Bill so the Scheme Operator may invest not only in infrastructure and recovery initiatives, but also in education and market development activities that build Queensland's recycling capacity over time.

**Rationale:** Recycling capacity is not built by trucks and facilities alone. It is built through better education, stronger markets and smarter systems that keep more material in the loop. If Queensland is genuinely serious about growing its recycling capacity, the scheme needs room to back the full chain, not just the physical assets at the front end.

## 5. Additional recommendation – Scheme Collaboration and Shared Infrastructure (building on Recommendation 16)

**Recommended amendment:** Amend the Bill to expressly provide that the scheme coordinator may support, co-fund, develop or participate in shared infrastructure and service models with other recognised product stewardship or recovery schemes, and must not unreasonably restrict operators from participating in other approved recovery streams where this is safe and practical.

**Rationale:** Queensland cannot afford to build a separate collection system for every material stream, particularly outside the south-east corner. In regional, rural and remote communities, shared infrastructure is not a nice idea; it is often the only practical way to recover more material at a reasonable cost. We're not looking for the beverage industry to fund other voluntary or under-funded schemes, but the Bill should make cooperation easier.

## 6. Recommendation 3 – Fixed Term

**Recommended amendment:** Consider amending the Bill to provide COEX with a five year term rather than a three year term. Amend the Bill to mandate that any supplier contractual arrangements exceeding the Scheme Coordinator's fixed term include formal transitional provisions for automatic uptake by any successor operator.

**Rationale:** A three-year term is at odds with the commercial reality of the waste and recycling sector. A five-year term is the minimum requirement to ensure scheme stability and investor confidence:

- **Embedding Structural Reform:** The Parliamentary Inquiry initiated a period of unprecedented collaboration between WRIQ and COEX. A three-year window is insufficient to implement, test, and refine the complex structural reforms currently being negotiated.
- **Preventing "Contractual Cliffs":** WRIQ members invest in essential infrastructure with amortisation periods typically spanning five to seven years. A three-year Coordinator term—without guaranteed contract continuity—creates significant sovereign risk and "contractual cliffs." This uncertainty stifles capital investment.
- **Ensuring Market Fairness and Continuity:** While WRIQ strongly supports the right of the market to tender for the Coordinator role, this must not come at the expense of frontline operations. By mandating transitional arrangements, the Government ensures that if a new Coordinator is appointed, the underlying contracts with operators remain secure. This protects the "boots on the ground" while still allowing for competitive tension at the Scheme Coordinator level.

## ***Non-Legislative Priorities: Opportunities for immediate government action***

In addition to the Committee's recommendations, WRIQ has identified a small number of priority areas not explicitly addressed in the current Bill but critical to ensuring the scheme delivers for Queensland. Given the timing of the legislative process and the expectation that there will be limited further opportunity to refine the Bill prior to debate in August, WRIQ considers it important that these matters are raised now for the Committee's consideration:

### **1. Government leadership through procurement**

WRIQ considers there is an immediate opportunity for the Queensland Government to demonstrate leadership through its own operations. As the State's largest landlord and waste generator, government procurement settings, particularly in relation to waste services in government tenancies, represent a practical and immediate lever to improve container recovery rates. We cannot expect the private sector to achieve 80% recycling rates if the Government's own offices are still sending bottles and cans to landfill. The State must institutionalise best-practice recovery by making separate recycling collection a standard requirement of all government waste procurement. This is a low-cost, high-impact reform that can be implemented immediately and at scale. It is also the fastest and most visible way for the Government to lift recovery rates without changing a single household behaviour.

### **2. Driving innovation through industry-led pilot programs**

WRIQ also sees a clear opportunity to strengthen the role of innovation within the scheme. The long-term success of the system will depend on how quickly it can adapt to real-world challenges and improve recovery on the ground. Through the MOU between WRIQ and COEX, industry is committing to deliver a Container Refund Scheme Innovation Challenge focused on capturing the large volume of containers currently lost from the commercial and industrial waste stream

The network already exists, operators are already in place and the problem is well understood. What is missing is the ability to test solutions quickly and scale what works. Without this, the scheme risks standing still while avoidable losses continue. With it, there is a clear pathway to lift recovery rates using infrastructure that already exists. WRIQ encourages the Committee to recognise this work and support Government investment in industry-led innovation and pilot programs to accelerate these outcomes.

### 3. Container lids – a simple, consistent message for Queenslanders

WRIQ, COEX, LAWMAC and LGAQ are working towards a consistent statewide approach that allows lids to remain on plastic bottles across Queensland's yellow top recycling bins and within the container refund scheme. This reform is well advanced, with final infrastructure considerations currently being worked through to ensure it can be implemented consistently across all regions.

Once confirmed, this change presents a clear opportunity for a coordinated statewide education campaign. WRIQ encourages COEX and the Queensland Government to work together to deliver simple, consistent messaging that reinforces this change for all Queenslanders.

This is the kind of practical reform that makes recycling easier for Queenslanders, and therefore easier to get right. People should not need different rules for different products, regions or schemes. We have a unique opportunity to give all Queenslanders one simple, consistent message they can follow every time.

WRIQ looks forward to working with the Queensland Government to implement these reforms and ensure the scheme delivers the outcomes it was designed to achieve.

Yours sincerely,

  
Alison Price  
Chief Executive Officer