

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

Submission No: 027

Submission By: Independent Brewers Association

Publication:



15 April 2026

Mr Robert Molhoek MP

Chair, Health, Environment and Innovation Committee

Member for Southport

Queensland Parliament

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

Members of the Health, Environment and Innovation Committee,

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

Rushed legislative process shows disregard for reality of small business

The proposed legislation, and the manner in which it has been produced, shows a total disregard for the independent brewing sector in Queensland and a profound lack of understanding of the business of a small brewery.

More importantly for Queensland beer drinkers, it shows that at a time of rising costs and business uncertainty, this government is prepared to make beer more expensive and drive small regional businesses close – so it can shift more money to satisfy the well-funded waste lobby.

There are approximately 95 independent breweries in Queensland with over 50% being located in regional and rural Queensland. In the 2023-2024 financial year, the independent brewing industry contributed \$588M to the Queensland community and provided 6,715 jobs. In the past month four independent breweries have closed.

As a very small organisation with limited resources, we have been given just three weeks over the easter long weekend to digest, understand and respond to a complex piece of legislation that directly impacts independent breweries. We've been given this short time-frame at a time when small businesses are struggling with rising fuel costs, consumer confidence and it is harvest season for one of our key raw ingredients.

This alone tells our industry everything we need to know - this government doesn't care about small businesses or Queensland beer drinkers. It cares about shoehorning through hastily drafted legislation to satisfy powerful lobby groups and vested interests.

While Government state that they want an ongoing Producer Responsibility Organisation – how can we take responsibility if we are not allowed to properly participate?



Until this legislation was made public on 26 March 2026, no independent brewery or our Association had been contacted by the Minister or the Department. We have had no other opportunity to provide input or even discuss these matters.

Complex Governance will drive up the Scheme Costs

The purpose of the CDS scheme in Queensland was to be a producer responsibility scheme that would reduce litter and improve recycling. To date, the Scheme in QLD hasn't fallen into the trap of other States in which there is a single operator contracting with Government that is profiting from the Scheme while beverage industry has no meaningful governance or oversight of what is supposed to be a producer responsibility scheme.

However, the cumulative impact of the changes that are being proposed to governance create a model that is almost unintelligible as a producer responsibility scheme and looks more and more like a Statutory Authority. The changes in the Bill will make the governance so complex and convoluted that it will no doubt add additional cost to the Scheme. A cost that has to be borne by producers and ultimately the public.

Money paid by beverage manufacturers to be used only to benefit the Scheme or beverage manufacturers

Taking funding for Government oversight amounts to double taxation

The Bill proposes that Government will take funds from the Scheme to 'recover the costs' of overseeing the governance of the Scheme.

Government is already funded by the taxpayer to provide an oversight role as a regulatory body. This Bill proposes to add complexity to the model, and then drive up the cost for producers to cover this additional governance and then Government are going to take that money from the Scheme for the privilege.

If Government want to exert this level of control over the entity that administers the Scheme why not make it a Statutory Authority and be honest with the Queensland public that they are paying a tax for the privilege of the Scheme?

It is impossible to reconcile that Government can simply take an unspecified amount of money, for an unspecified purpose that beverage manufacturers have paid so that it can perform its core Government role.

Is the proposal really that Queensland beer drinkers will be double tapped for the privilege of a CDS Scheme?

COEX's retained earnings is to be used for the benefit of the Scheme or beverage manufacturers



There is suggestion throughout the legislation in a plan for “investment” of COEX’s retained earnings. Those are funds that have been paid for by Queensland’s consumers and beverage producers. Accordingly, those funds can (and should) only be repurposed for the betterment of the Scheme or the producers that paid those funds.

Any attempt to acquire those funds for any other purpose – be it through the direction of an alternative investment plan, invoices from the Department for unknown services, or the appointment of a Special Manager to some unneeded task – it would be an entirely inappropriate appropriation of funds.

The Container Deposit Scheme in Queensland directly impacts our members in a profound way – as a significant cost of goods.

Queensland beer drinkers already pay approximately \$6.13 per a 24 carton just for the container refund scheme in the hope that they can earn back \$2.40. As the price of the scheme increases, so too will the price of beer. Is this really what this government wants?

The Bill says that it recognises the challenges facing small beverage manufacturers – but the reality of both the process and the cumulative impact of the scheme does not reflect that. Providing financial relief while making the scheme more expensive to run overall – cancels out any benefits. Its giving with one hand while taking with another.

There has been no consultation or discussion on what financial relief for small manufacturers means or whether it will have any meaningful impact on the cost of this scheme to independent producers and their consumers. And while arguable this may come during the regulatory drafting process – nothing about the process to date gives any confidence that this will be so.

Small Producer Threshold excludes most independent brewers from Board opportunities

The Bill includes a provision that says that there can be no more than two member directors from large producers on the Board at any time. However, the intention of the PRO was that it is a member-based producer responsibility scheme that could expand membership overtime.

The legislation defines “large” as any manufacturer that produces over 300,000 containers per annum. Independent brewers are small producers under almost any other government classification – and yet under this scheme the vast majority would be defined as large producers because of the volume of containers.

This provision was not a recommendation of the Inquiry and unnecessarily restricts the majority of independent brewers from taking an active role in what ostensibly remains and Producer Responsibility Scheme.



Independent brewers in Queensland stand willing to work with Government on a suite of sensible reforms and will do our best to be available for any, and all consultation that is available.

It remains our hope that this Government will take a step back during the Committee and Cabinet process and reflect on whether driving up the cost of beer by adding in complex and unnecessary governance is what Queenslanders really want?

We remain available to discuss these matters, or any other matters impacting small independent producers in Queensland.

Your sincerely,



Sabrina Kunz

Chief Executive Officer