



Submission responding to the
Queensland Government's Discussion
paper:

*Proposal to expand the scope of
eligible containers in Queensland's
Container Refund Scheme – Containers
for Change.*

20 February 2023

Contents

| | |
|--|----|
| About Australian Grape & Wine | 3 |
| Introduction..... | 4 |
| Wine industry commitment to sustainability | 5 |
| Consultation shortcomings | 6 |
| Expanding the scheme to include wine bottles would not align with the objectives of Queensland’s CDS | 6 |
| Objective 1: Increase the recovery and recycling of empty beverage containers..... | 6 |
| Objective 2: Reduce the number of empty beverage containers that are littered or disposed to landfill..... | 7 |
| Objective 3: Ensuring the manufacturers of beverage products meet their product stewardship responsibilities in relation to beverage products..... | 8 |
| Shouldn’t we be looking for the best model for glass recycling? | 8 |
| Why was the EPA so dismissive of alternatives? | 9 |
| Objective 4: Provide opportunities for social enterprise, and benefits for community organisations..... | 10 |
| Objective 5: Complement existing collection and recycling activities for recyclable waste..... | 10 |
| Cost to Australian wine businesses..... | 10 |
| The CDS shifts costs, but doesn’t share them | 10 |
| Our ability to pass on costs is extremely limited | 11 |
| Cash flow concerns..... | 11 |
| Equity and competition concerns | 11 |
| Other considerations | 12 |
| Confused CDS users is not a rationale for including wine bottles in the CDS | 12 |
| What is the value of education? | 12 |
| Conclusion | 12 |
| Contact..... | 13 |



About Australian Grape & Wine

Australian Grape & Wine is Australia's national association of winegrape and wine producers. Our activities focus upon the objective of providing leadership, strategy, advocacy and support that serves Australian wine businesses now and into the future.

We represent the interests of the more than 2,500 winemakers and 6,000 winegrape growers working in Australia. Our role is to help forge a political, social and regulatory environment - in Australia and overseas - that enables profitable and sustainable Australian wine and winegrape growing businesses. These businesses make a significant contribution to underpinning regional economies by driving growth in jobs, regional exports and food and wine tourism.

We represent small, medium and large winemakers and winegrape growers from across the country. Policy decisions by the Australian Grape & Wine Board require 80% support, ensuring no single category can dominate the decision-making process and guaranteeing policy is only determined if it provides significant industry benefit. In practice, most decisions are determined by consensus.

Australian Grape & Wine is recognised as a representative organisation for winegrape and wine producers under the *Wine Australia Act 2013*, and is incorporated under the *SA Associations Incorporation Act 1985*. We work in partnership with the Australian Government to develop and implement policy that is in the best interests of winegrape growers and winemakers across Australia.

Introduction

Australian Grape & Wine strongly opposes the proposed expansion of Queensland's Container Deposit Scheme (CDS) to include wine bottles.

As an industry we are firmly supportive of reasonable, evidence-based policy interventions to improve glass recycling and movement towards a more circular economy. Pillar three of the sector's [Vision 2050](#) strategy highlights the importance of sustainability to the sector, our community, the land and on the environment within which we grow grapes and make wine. Recycling glass wine-bottles is part of our sustainability commitment, with many of our members having publicly committed to ambitious targets relating to recycling and packaging.

The Queensland Government's Discussion Paper of December 2022, entitled *"Proposal to expand the scope of eligible containers in Queensland's Container Refund Scheme – Containers for Change"*, fails to:

- articulate the problem that it is proposed expanding the scope of the CDS would solve;
- present any evidence to support the argument that expanding the CDS to include wine bottles will improve recycling rates;
- provide the reader with a neutral analysis of the costs and benefits of the scheme; and
- provide the reader with options for alternative recycling schemes.

This is disappointing, particularly given the data that has been made available in other similar proposals in South Australia and New South Wales in recent months.

By presenting a binary choice of expanding the scope of containers eligible for the CDS, the Queensland Government is doing its community and wine industry a disservice. Indeed, by tweeting "We want to expand Containers for Change to include wine & spirit bottles" on 8 November 2022, the Minister for the Environment has reinforced the view that industry is being consulted on a pre-determined outcome. This is a missed opportunity for Queensland to take a leadership role in a more meaningful national discussion about glass recycling in Australia. What is the problem the Government is trying to solve by expanding the scope, and what will expanding the scope deliver?

Without data to draw upon in Queensland, we will refer to the EPA data from the South Australia and NSW Government's discussion papers. For example,

- In terms of increasing the recovery of containers, both SA and NSW discussion papers noted a negligible improvement resulting from including wine bottles in the schemes. In NSW, the EPA forecast an increase from 43.9 per cent to 44.1 per cent.¹ In the case of South Australia, the increase in recovery of glass containers was only from 77 per cent to 78 per cent.²
- In terms of projected recycling improvements, the results are similarly poor. In the NSW Government's Discussion Paper, under its preferred option (Option 2) – the EPA forecasts expanding the scope to include wine bottles (and spirits bottles) would deliver just a 0.5 per cent increase in recycling rates.³ And while we acknowledge the argument that CDS provides for a cleaner stream of glass, we are in no way convinced that the benefits of this proposal outweigh the enormous cost to NSW wine businesses and their interstate counterparts. In South Australia, the Discussion paper focuses on increased recovery, but places little-to-know emphasis on how this increased recovery would lead to better recycling rates.

Given the clear limitations association with including wine bottles in CDS arrangements, it is perplexing and

¹ Marsden Jacob Associates, "Cost-benefit analysis of options to improve resource recovery in NSW", 13/10/2022, p 34.

² South Australian EPA Discussion Paper, "Improving South Australia's Recycling Makes Cents", page 34

³ Marsden Jacob Associates, "Cost-benefit analysis of options to improve resource recovery in NSW", 13/10/2022, p 34.

disappointing that EPAs across Australia are willfully failing to take an evidence-based, comprehensive assessment of all the options to achieve this objective.

In terms of cost, in NSW alone, we conservatively estimate that the inclusion of wine bottles in the scheme would cost Australian winemakers, at a minimum, approximately \$45 million per year⁴. If the inclusion of wine bottles to CDS arrangements is applied nationally, the cost to industry would be upwards of \$100 million.⁵ As will be discussed in this submission, there is very little opportunity to pass this cost on to consumers, meaning the cost of the scheme sits solely with the wine business, despite the purported benefits flowing to every other aspect of the value-chain. To put this in context, a \$100 million cost roughly equates to the scale of Australia's sixth largest export market, (New Zealand, valued at \$103.4 million in the year to September 2022).

This submission does not address all questions raised in the discussion paper, instead focusing on matters relating to the inclusion of wine bottles in the CDS. And while Australian Grape & Wine engaging in good-faith in this consultation process, we urge the Queensland Government to review a broader range of alternatives to glass recycling and refine its cost-benefit analysis methodology to include assumptions relating to job losses in Australia's grape and wine sector and the comparative carbon emissions profile of CDS versus alternative arrangements. The assumption that we have seen in consultation processes across different jurisdictions, that no jobs will be lost in Australia's grape and wine sector due to the passing on of costs sector, is naïve and ill-informed and must be addressed.

Wine industry commitment to sustainability

Australian Grape & Wine is committed to exploring ways to continuously improve the sustainability of Australia's grape and wine sector. Sustainability is at the heart of our sector's [Vision 2050](#) document (see pillar 3), and with regard to glass recovery and recycling, a large proportion of the wine bottles sold in Australia would already fall under the jurisdiction of the Australian Packaging Covenant, a national regulatory framework under the National Environment Protection (Used Packaging Materials) Measure 2011 (NEPM), that sets out how governments and businesses across Australia share the responsibility for managing the environmental impacts of packaging.

The Covenant applies to businesses in the supply chain that have an annual turnover of \$5 million or more. These businesses are required to choose between becoming a Signatory to the Covenant and contributing to the collective national efforts in managing packaging waste, or meeting compliance obligations under the National Environment Protection Measure (NEPM), which are implemented by the laws and other arrangements of participating states and territories, where a business sells or distributes its products. These criteria would encompass most medium and large wine producers throughout Australia.

Signatories to the Covenant are obliged to reduce the environmental impacts of their consumer packaging by optimising resource recovery of packaging materials through the supply chain. As such, winemakers are already mindful of ensuring packaging is easily recycled and packaging materials or waste, is captured before it enters the environment. The Covenant is overseen by the Australian Packaging Covenant Organisation (APCO), and with APCO's administrative support, a group of approximately 25 wine businesses have already been working together under a 'collective impact model' to implement initiatives such as, developing cross-industry sustainable

⁴ Cost estimate is based on the number of wine bottles sold in NSW multiplied by the 13.72 cents contribution pricing + GST + Registration, compliance and administration costs. This is a conservative figure – and we note in the South Australian context, the South Australian Wine Industry Association independently estimated costings placed the figures of expanding the South Australian Scheme to include wine bottles as high as 55 cents per bottle in the first year, and 40 cents per container, per annum, ongoing.

⁵ This uses the same costing formula applied in the NSW example.

packaging guidelines; initiating a pilot regional waste drop-off facility in the Barossa Valley; reviewing the use and weight of glass and cardboard used in wine packaging and other packaging items such as closures; exploring ways to reduce cling film to wrap pallets; and exploring a retail store program to reduce packaging waste at the point of sale.

While there is certainly more work that the wine sector can do to reduce and reuse glass, we do not support including wine bottles in the Queensland CDS. As the national grape and wine sector representative body, Australian Grape & Wine is keen to work with the Queensland Government and the EPA on the best mechanisms to drive real improvements in glass recycling that are cost-efficient, evidence-driven and equitable across the supply-chain.

Consultation shortcomings

Australian Grape & Wine is deeply concerned by the shortcomings in the consultation process to date. While we appreciate Minister Scanlon meeting with us ahead of the release of the document, along with the offer to participate in the cost-benefit analysis being undertaken in parallel with the consultation process, we are firmly of the view that the discussion paper does not provide people with a clear sense of the costs and benefits of what they are being asked to provide feedback on.

As noted earlier in this submission, we are also concerned that the Government has pre-determined the outcome it is seeking to pursue. The Minister's pre-emptive tweet of 8 November 2022, the presentation of a binary expansion or no-expansion proposition, and the glowing review of the CDS scheme without presenting a clear rationale for including wine bottles feeds this view. This is broadly consistent with the approach taken by other State Governments, which seem intent on including wine bottles despite the overwhelming evidence that doing so would lead to a miniscule increase in glass recovery and recycling, at a cost of more than \$100 million to the sector annually.

We suggest the discussion paper itself is written in a way that prohibits the reader from making a common sense, evidence-based decision. It is clearly biased towards leading the reader towards agreeing with the EPA's preferred proposal, and this is deeply disappointing.

Expanding the scheme to include wine bottles would not align with the objectives of Queensland's CDS

On page 4 of the Discussion paper, it is noted that Queensland's CDS is designed to achieve five main objectives. However, the paper does not present compelling evidence to support how including wine bottles in the CDS would deliver on these objectives.

Objective 1: Increase the recovery and recycling of empty beverage containers.

Including wine bottles in the CDS will not increase recovery or recycling in any meaningful way.

As noted earlier in this submission, without data to draw upon in Queensland, we will refer to the EPA data from the South Australia and NSW Government's discussion papers. For example,

- In terms of increasing the recovery of containers, both SA and NSW discussion papers noted a negligible improvement resulting from including wine bottles in the schemes. In NSW, the EPA forecast an increase from

43.9 per cent to 44.1 per cent.⁶ In the case of South Australia, the increase in recovery of glass containers was only from 77 per cent to 78 per cent.⁷

- In terms of projected recycling improvements, the results are similarly poor. In the NSW Government's Discussion Paper, under its preferred option (Option 2) – the EPA forecasts expanding the scope to include wine bottles (and spirits bottles) would deliver just a 0.5 per cent increase in recycling rates.⁸ And while we acknowledge the argument that CDS provides for a cleaner stream of glass, we are in no way convinced that the benefits of this proposal outweigh the enormous cost to NSW wine businesses and their interstate counterparts. In South Australia, the Discussion paper focuses on increased recovery, but places little-to-know emphasis on how this increased recovery would lead to better recycling rates.

It is impossible for people to make an informed decision about the Queensland proposal without access to rigorous, neutrally presented data. We understand that consumers and the broader community are increasingly valuing sustainability. This research aligns with consumer insights across our markets that people are seeking to make sustainable choices in their purchasing decisions.

Objective 2: Reduce the number of empty beverage containers that are littered or disposed to landfill

Including wine bottles in Queensland's CDS will not reduce litter or redirect from landfill.

The Queensland Government's Discussion Paper rightly points out that the CDS has contributed to a reduction in litter. We agree that to date, the CDS has been a highly effective mechanism for reducing litter.

However, the paper does not explain anywhere in the discussion paper that wine bottles do not contribute in a meaningful way to the litter stream. This is due to the fact that wine bottles are consumed at the home or at a licensed premises and are placed in kerbside recycling bins on the overwhelming majority of occasions.

While it is difficult to extrapolate data specifically attributable to wine bottles in Queensland, we note that in 2020-2021, non-CDS drink containers contributed 0.34 per cent to the litter stream in NSW, while CDS eligible containers made up 5.18 per cent.⁹ In Queensland, the best publicly available data shows the very low rates of glass in the litter stream, compared to other items.¹⁰

⁶ Marsden Jacob Associates, "Cost-benefit analysis of options to improve resource recovery in NSW", 13/10/2022, p 34.

⁷ South Australian EPA Discussion Paper, "Improving South Australia's Recycling Makes Cents", page 34

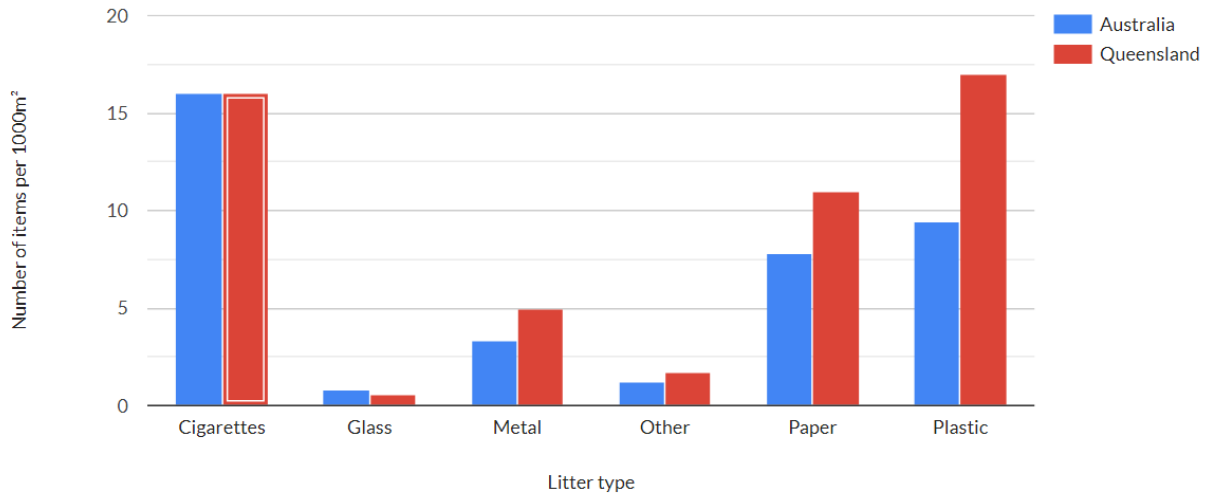
⁸ Marsden Jacob Associates, "Cost-benefit analysis of options to improve resource recovery in NSW", 13/10/2022, p 34.

⁹ [Litter composition by items \(nsw.gov.au\)](https://www.nsw.gov.au/litter-composition-by-items)

¹⁰ [Main material types littered | State of the Environment Report 2020 \(des.qld.gov.au\)](https://www.des.qld.gov.au/state-of-the-environment-report-2020)

Litter items by type, 2018-2019

CHART TABLE



The omission of this data in the context of a paper primarily focused on the expansion of eligible containers is misleading to the reader, who we assess would be highly likely to assume the inclusion of wine bottles would contribute to litter reduction.

Objective 3: Ensuring the manufacturers of beverage products meet their product stewardship responsibilities in relation to beverage products.

Including wine bottles in the CDS is a very poor and highly costly product stewardship model.

Australian wine businesses understand the importance of meeting consumer and retailer requirements for recycled content in wine bottles. As an industry, we want to embrace the circular economy, and indeed, the recycled content proposals in many of our export markets (we export around 60 per cent of our production nationally) require us to be looking for ambitious approaches to improving recycling rates. With this in mind, we are deeply concerned that CDS arrangements will simply not achieve the rates of recycling we need.

Shouldn't we be looking for the best model for glass recycling?

Australian Grape & Wine is disappointed that the Queensland Government has missed an opportunity to comprehensively consider the range of options available to drive significant improvements in glass recycling and circular economy outcomes. Rather than seeking to adopt a global best practice outcome, the Government is proposing an outcome in a CDS expansion that will cost Australian winemakers \$100 million per annum (at a minimum) if rolled-out nationally, for just a 0.5 per cent increase in recycling rates (if we refer to the NSW EPA's assessment). This is an extremely poor return on the enormous costs that would be imposed on the sector. Furthermore, we question what the margin of error of a 0.5 per cent increase over a twenty-year timeframe would be.

Why was the EPA so dismissive of alternatives?

Australian Grape & Wine is deeply disappointed that the Queensland Government has failed to take a principled approach to assessing how business (wine, retail, bottle manufacturers, recycling), community and local governments could work together to deliver the optimum model for glass recycling in Australia. The Government had an opportunity to be world leading, but has instead chose to attempt to re-purpose a litter-reduction scheme into something else.

It is difficult to understand why alternative arrangements to improve glass recycling were not raised in the Discussion Paper. While there are many options that could be considered, we note that in the New South Wales example, a 4th kerbside bin for glass was referred to in the discussion paper, which highlighted:

- the EPA's cost benefit analysis pitched the fourth bin as delivering far greater recycling outcomes;
- the Victorian Government is in the process of rolling out its fourth bin for glass recycling, with data yet to be collected;
- a fourth bin for glass collects more glass overall (as it includes things like jam and pasta sauce jars) and separates glass, and on occasion glass shards, from other recyclable materials such as paper and plastics – delivering a dual benefit of a cleaner glass stream and a cleaner stream for other materials.
- in the South Australian example, the SA EPA's Hudson Howells economic modelling report states on page 27, that of the options presented in that context “
- the greatest economic impact is generated by the 4th kerbside bin option”
- The NSW EPA's cost-benefit-analysis shows that a 4th kerbside bin option result in twice as much waste avoiding landfill sites compared to the EPA recommended inclusion of wine bottles in the CDS (1.4 million tonnes in total).

British Glass also supports a kerbside collection model, as opposed to a CDS. In December 2021 it noted¹¹

- A good kerbside recycling model for glass packaging will deliver **11% more carbon savings than including glass in a DRS – that's over two million tonnes of CO₂ saved by 2035.**
- An improved, consistent kerbside scheme would lead to “**a collection rate of close to 90% of [all] glass packaging** placed on the market across both drinks containers and all other types of glass packaging” (compared with DRS which anticipates a collection rate of just 85% but is limited to drinks containers only).

And even in Europe, which is often at the vanguard of sustainability requirements globally, a recent report noted the importance of exempting wine bottles from any container refund scheme. The EU has recently released a broad proposal on food and beverage [packaging waste](#), and while do not commend all aspects of the report to you, we note that on page 40 the report states that:

Given the nature of the products and the differences in their production and distribution systems, deposit and return systems should however not be obligatory for packaging for wine, aromatised wine products, spirit drinks and milk and milk products listed in Part XVI of Annex I of the Regulation (EU) No 1308/2013 of the European Parliament and of the Council Member States may establish deposit and return systems covering also other packaging.

Another option to be considered is more comprehensive and well-designed product stewardship arrangements, similar to that proposed by the Glass Packaging Forum in New Zealand. In an August 2022 report entitled “Product stewardship scheme design for glass”, it was noted by the Forum that “Our modelling shows the scheme

¹¹ www.britglass.org.uk, “Deposit Return Scheme will produce more carbon and collect less glass than improved kerbside scheme, report says”, 8 December 2022.

could achieve high rates of bottle-to-bottle use and lower overall emissions than the CRS, at a cost profile similar to or slightly better than the CRS."¹²

If better options are available to us, why is the Queensland Government, and indeed the Australian Government and other jurisdictions, not seriously assessing world's best practice options to achieve improvements in glass recycling?

We ask the Government to reassess the options available to improve glass recycling, taking into account a more comprehensive cost-benefit analysis that incorporates employment, investment and carbon emissions.

Objective 4: Provide opportunities for social enterprise, and benefits for community organisations.

While we take the Queensland Government's assessment that the CDS has led to an uplift in benefits to social enterprise and community organisations, we suggest that this should be a secondary concern for policy makers. The primary decision point for policy makers should relate to the extent to which including wine bottles in the CDS would improve recovery and recycling outcomes. As already stated, we do not see a strong evidentiary basis to support either of these claims.

Objective 5: Complement existing collection and recycling activities for recyclable waste.

We have not seen any evidence to support the claim that including wine bottles in the CDS would help meet this objective.

Cost to Australian wine businesses

As noted earlier in this submission, Australian Grape & Wine conservatively estimates a cost of \$100 million per annum to the Australian wine sector if wine bottles are included in CDS arrangements nationally. This cost does not justify a 0.5 per cent increase in recycling rates over a twenty-year period, as forecast in New South Wales.

The CDS shifts costs, but doesn't share them

Unlike well-designed product stewardship arrangements, the proposal put forward by EPAs around Australia to include wine bottles in CDS systems is not based on cost sharing at all, it is based on cost shifting to wine businesses at a magnitude that will undoubtedly lead to widespread job losses in regional Australia.

NSW Wine's modelling suggests a micro producer would face costs of more than \$11,000 per annum to comply with the scheme, while a large producer crushing 50,000 tonnes and filling 46 million bottles across 36 SKUs would face a base cost of \$6.91 million per annum. Estimates by the South Australian Wine Industry Association are higher than this figure.

Frankly, this cost cannot be passed on and would need to be absorbed in the form of operational cost cutting in the form of job losses, or the closure of businesses. This point is particularly pertinent during a period in which our sector is experiencing a period of sustained and very serious oversupply in the red wine market following the effective closure of the China market and other factors.¹³

The proposal to include wine bottles into the scope of the CDS, as put forward by the Queensland Government, would not be an example of sharing responsibility – as it pertains to cost – along the product supply chain. Indeed, it places almost the entire cost burden on the winemaker, even though there are other beneficiaries of this proposal, such as, local councils, the recycling sector and glass manufacturers, whose energy prices reduce in

¹² Glass Packaging Forum, "Product stewardship scheme design for glass", August 2022, page 2.

¹³ [Australia's wine stock levels rise following 12 months of challenging global conditions | Wine Australia](#)

line with the receipt of cheap materials to repurpose. It is fundamentally inequitable that wineries foot the bill for an initiative that benefits glass manufacturers, community groups, local councils and others.

Our ability to pass on costs is extremely limited

The view that wine businesses can pass on the costs of the CDS has been presented as a *fait accompli*.

Australian Grape & Wine has canvassed its membership on this issue and the clear view is that this assumption is a seriously flawed. Winemakers face considerable issues relating to a very competitive retailer landscape in Australia. Roy Morgan data compiled in May 2020¹⁴, estimated that the combined groups of Coles and Woolworths Liquor Group, were responsible for up to approximately 75 per cent of all wines distributed and sold through retail sales channels. While the concentration of the two major retailers has brought a high level of competition to the marketplace, resulting in lower prices for consumers, it has also left winemakers with fewer options in terms of sales channels, and also smaller profit margins.

It is important to understand that wine companies do not have long-term supply contracts with retailers, and in most cases have little ability to influence price. Retailers have many different wine brands to choose from and there are very few brands that are “must-have” for alcohol retailers. Australian Grape & Wine understands that an average retail store carries around 2,000 stock-keeping units (SKUs) from about 355 wine brands, while the largest stores can carry considerably higher numbers of wines. Australian retailers also can source product from winemakers in many overseas countries, so there is a highly competitive marketplace in which retailers are able to place considerable price pressure on suppliers.

Given this, winemakers would likely be forced to absorb any increased costs arising from the CDS. The assumption that the experience of beer and soft drink producers would be replicated in the case of the wine sector is incorrect. While we note the beer industry in NSW was able to pass on approximately 7 cents of the CDS costs in that state, three large multinational beer companies control upwards of 90 per cent of the beer market in Australia. Australia’s wine sector is far less concentrated with large companies capturing nothing like the percentage market share controlled by the major beer producers. If major multinational beer companies could only pass on seven cents, we should expect wine businesses to be in a position to pass on nearly zero.

Further to this, beer companies are able to brew in kegs and spread costs in a way that wine businesses cannot, and they are also able to dial up or dial down production easily. Grape and wine businesses are agricultural businesses, with one chance to produce grapes and wine each year from permanent plantings. They cannot simply decide not to produce for a period if cash-flow is a problem, for example, in a way that beer or soft drink companies can.

Cash flow concerns

We note that in the New South Wales context, wine producers raised serious concerns about the potential cash flow implications of receiving a bill for their CDS contribution with seven-day payment terms. In the wine sector, it is common for businesses to operate on payment terms of 30, 60 or 90 days, depending on the sales channel.

Equity and competition concerns

Many in the wine sector are concerned that the expansion of the CDS to include wine bottles would equate to a wealth transfer from family-owned Australian businesses to multinational corporations which run the CDS arrangements across Australia (including multinational beer and soft drink companies) with a vested interest in the data, finances and recyclable material outcomes deriving from the scheme.

¹⁴ Roy Morgan Alcohol Retail Report, published May 2020

Other considerations

Confused CDS users is not a rationale for including wine bottles in the CDS

We note with curiosity the claim on page 20 of the Discussion Paper that “A key benefit of a more comprehensive Scheme is that it would help to reduce consumer confusion over which beverages and container types are included in the Scheme”. Again, this speaks to the Discussion Paper’s unreasonable attachment to a pre-determined outcome.

We are not at all convinced that consumer confusion about eligible containers is a rationale to expand the scope. While we have not seen any data to back up the claim, we accept that some consumers may be confused about why wine bottles are not included. But would this rationale for expansion be applied if consumers were bringing milk bottles to CDS’s, or jam jars, or paint tins? While this is perhaps stretching the hypothetical, the argument is confusion is not a rationale for expansion remains strong.

Furthermore, the paper absolves the EPA of responsibility for educating consumers about eligibility requirements.

What is the value of education?

Australian Grape & Wine would like to know to what extent, an education campaign, or other innovations to engage the community, would improve recovery rates?

An education campaign could, potentially, have the dual benefits of increasing recovery rates in terms of volume, and helping address the identified problem of the presence of glass packaging in co-mingled kerbside rubbish bins. We believe an effective community and business education campaign could easily lead to an increased recovery rate of the same degree or more, as the costly CDS model put forward by the Queensland Government.

This view is also supported in the CSIRO Circular Economy Report where it suggests that “Harmonising messages to consumers through consistency in labelling, recycling instructions, and education messages will underpin effective behaviour change in household, commercial, and industry purchasing, consumption and recycling routines. This will help ensure reduced waste generation, cleaner recyclables are collected, more efficient sorting outcomes are achieved, and end markets for recycled products are sustained.”¹⁵ We further contend that an education campaign could be delivered at little to no cost to wine businesses, and negligible cost to the Queensland Government.

Sadly, the Discussion Paper is silent on other options to drive improvements, except for the superficial and dismissive contemplation of the fourth glass bin option.

Conclusion

Australian Grape & Wine hopes the Queensland Government seriously considers the points raised in this submission and uses this as justification to take a step back from its proposal and assess its options to improve glass recycling in a more holistic and comprehensive manner. The cost of this proposal is immense and will cost jobs and put at risk investment opportunities in Queensland’s wine industry and across Australia without driving meaningful environmental and recycling outcomes.

I would be happy to discuss this further at any stage.

¹⁵ CSIRO Circular economy roadmap for plastics, glass, paper and tyres, Pathways for unlocking future growth opportunities for Australia, January 2021, Page 96



FOR INDUSTRY, BY INDUSTRY

Contact

Lee McLean

Chief Executive Officer

14-16 Brisbane Avenue

Barton, ACT 2600

Tel: +61 418 998 749

Email: lee@agw.org.au

