

Queensland Health, Environment and Innovation Committee Inquiry into the *Waste Reduction and Recycling (Container Refund Scheme) Amendment Bill 2026*

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Level 1, Industry Offices National Wine Centre Botanic Road Adelaide SA 5000 | PO Box 2414 Kent Town SA 5071 | **T** +618 8133 4300 **E** info@agw.org.au

Who we are

Australian Grape and Wine Incorporated (Australian Grape & Wine) is Australia's national association of winegrape and wine producers. We represent the interests of the more than 2,000 winemakers and over 5,000 winegrape growers working across Australia's 65 wine regions.

The Australian grape and wine sector is a major contributor to Australia's economy and to rural and regional communities.

The grape and wine sector:

- Supports 203,392 direct and indirect full- and part-time jobs.
- Generates $15 billion in income from direct and flow-on employment.
- Contributes $51.3 billion to Australia's gross output.
- Adds $25.4 billion in value-added to the Australian economy[1].

Wine production is a critical pillar of many regional communities, underpinning local manufacturing, exports, tourism, hospitality and supply-chain businesses.

Australian Grape & Wine works to create a political, social and regulatory environment - domestically and internationally - that enables profitable, innovative and sustainable grape and wine businesses. We provide leadership, strategy, advocacy and practical support across issues affecting growers and producers of all sizes. Our Board decision-making processes require an 80% support threshold, ensuring that industry positions reflect broad and genuine consensus.

Australian Grape & Wine is recognised as a representative organisation under the *Wine Australia Act 2013* and is incorporated under the *SA Associations Incorporation Act 1985*.

[1] AgEconPlus & Gillespie Economics, *Economic Contribution of the Australian Wine Sector 2025*, report prepared for Wine Australia, 7 August 2025, Executive Summary (unnumbered pages).

Introduction

Australian Grape & Wine (AGW) welcomes the opportunity to provide a submission on the Queensland *Waste Reduction and Recycling (Container Refund Scheme) Amendment Bill 2026*.

AGW acknowledges the Queensland Government's focus on strengthening governance, transparency and oversight of the Container Refund Scheme (CRS), and supports measures that improve accountability and scheme performance.

This submission focuses on elements of the Bill and proposed regulatory settings that are of direct relevance to the wine sector, in particular the proposed exemption for small beverage manufacturers and broader considerations around proportionality, regulatory burden and national harmonisation.

Exemption for Small Beverage Manufacturers

AGW welcomes the Queensland Government's commitment to introduce financial relief for small beverage manufacturers through an exemption on the first 20,000 containers sold into Queensland.

Following consultation with the Department of the Environment, Tourism, Science and Innovation, AGW understands that:

- A *small beverage manufacturer* will be as defined in s.36 of the *Waste Reduction and Recycling Regulation 2023*, which states - For section 99R(2) of the Act, definition *small beverage manufacturer*, a manufacturer of a beverage product is prescribed to be a small beverage manufacturer for a financial year if the manufacturer manufactures not more than 300,000 of the beverage product for the financial year.
- Eligible producers will not be charged scheme contributions on the first 20,000 containers, equating to a saving of approximately $2,660 per year; and
- The detailed mechanism will be set out in forthcoming regulation, which is expected to be provided to the Committee in draft form.

AGW supports this measure as a positive step toward recognising the disproportionate impact that CRS costs can have on smaller producers, many of whom operate on tight margins in regional communities.

The Department noted during the public briefing that the intent of this measure is to ensure that small producers are not subject to undue regulatory burden. AGW strongly supports this principle.

Importance of Minimising Regulatory Burden

While the proposed financial relief is welcome, AGW emphasises that the effectiveness of the exemption will depend on how it is implemented in practice, particularly in relation to reporting and administrative requirements.

For many small wine producers, compliance with CRS obligations—particularly frequent data reporting—can represent a significant administrative burden.

If producers are required to:

- regularly log into reporting systems; and
- submit detailed sales data for relatively small volumes

then the administrative cost of compliance may offset or exceed the financial benefit of the exemption.

AGW therefore considers it critical that the regulatory framework supporting the exemption includes streamlined, low-burden reporting arrangements for eligible producers.

This issue must also be considered in the broader national context. By the end of 2027, beverage producers are expected to be operating across up to six different container deposit schemes, each with:

- separate data entry portals;
- differing registration requirements;
- inconsistent labelling obligations; and
- varying invoicing and payment terms.

This emerging patchwork of regulatory requirements is untenable, particularly for small and medium-sized producers operating across multiple jurisdictions.

In this context, the urgency of progressing a national, harmonised reporting approach, including the proposed single portal agreed by Environment Ministers, is critical.

AGW therefore emphasises that:

- the design of the Queensland exemption and reporting framework should minimise duplication wherever possible; and
- implementation should be undertaken with a clear view to future integration into a national system.

Without this, there is a real risk that the administrative burden associated with compliance will continue to grow, undermining the intended benefits of targeted relief measures such as the small producer exemption.

Streamlined Reporting Options

AGW encourages the Queensland Government and scheme coordinator (COEX) to adopt a practical and proportionate approach to reporting for small producers.

Potential approaches that could reduce regulatory burden include:

- Use of prior year sales data to determine eligibility;
- Annual or periodic reporting, rather than frequent (e.g. monthly) reporting requirements;
- Self-assessment or declaration-based systems, supported by audit mechanisms where necessary; and
- Simplified reporting interfaces tailored to low-volume producers.

AGW intends to engage constructively with COEX to explore how these options can be implemented in a way that maintains scheme integrity while minimising unnecessary administrative burden.

National Harmonisation and the Case for a Single Portal

AGW notes the communiqué from the Environment Ministers' Meeting of 27 March 2026, which stated:

"Ministers agreed to progress a national portal for beverage suppliers as a matter of urgency, noting that each jurisdiction is dealing with their own specific circumstances and a flexible approach may be required, subject to scheme review. They noted the support from the beverage industry for this work. A single portal is a significant

step forward to harmonise scheme requirements and will reduce the administrative burden for beverage suppliers. The next phase is to design the portal requirements, working with container deposit scheme stakeholders."

AGW strongly supports this direction.

The introduction of a national portal represents a critical opportunity to:

- reduce duplication across jurisdictions;
- streamline reporting requirements; and
- materially lower administrative burden for beverage producers operating nationally.

In this context, AGW emphasises that:

- any new regulatory requirements introduced through the Queensland CRS should be consistent with, and adaptable to, a future national system; and
- the design of the small producer exemption should align with this broader objective of harmonisation and simplification.

Failure to do so risks entrenching fragmented, jurisdiction-specific requirements that increase complexity and cost for industry.

Access to Disaggregated Data for Wine Glass

AGW emphasises the importance of access to disaggregated data specific to wine glass in order to properly assess the effectiveness of Container Refund Scheme (CRS) settings and any future policy decisions relating to the inclusion of wine containers.

At present, publicly available data is typically reported at an aggregated level (e.g. "all glass"), which does not allow for meaningful analysis of:

- the contribution of different glass categories to the scheme;
- relative recovery and recycling rates; or
- the actual impact of policy changes on specific sectors, including wine.

Without access to wine-specific data, it is not possible to determine:

- whether inclusion of wine containers (where applicable in other jurisdictions) is delivering measurable environmental benefits;
- whether wine glass contributes materially to litter streams; or
- whether the costs imposed on industry and consumers are proportionate to the outcomes achieved.

AGW notes that, to date, there has been no clear explanation as to why disaggregated reporting for wine glass is not available. Industry engagement with scheme administrators has indicated that this is not a question of technical feasibility, but rather that such reporting has not been specifically requested by Government.

AGW submits that this is a significant gap in the evidence base underpinning CRS policy.

Given the increasing focus on transparency and performance monitoring within the Bill, AGW recommends that:

- reporting requirements explicitly include disaggregated data by material subtype, including wine glass;

and
- this data be made publicly available in a consistent and accessible format.

Access to this information is critical to:

- support evidence-based policymaking;
- enable industry to assess the effectiveness of regulatory interventions; and
- ensure that future decisions regarding scheme scope and design are informed by robust, sector-specific data.

In the absence of such data, there is a risk that policy settings will continue to be applied on the basis of assumptions rather than evidence, particularly in relation to sectors such as wine that have historically been excluded from the scheme on well-founded environmental and economic grounds.

Governance and Board Composition

AGW acknowledges the Queensland Government's intent to strengthen the governance of the Container Refund Scheme (CRS), including through changes to the composition and oversight of the scheme coordinator (PRO) board.

In particular, AGW notes the proposed requirement for a majority of board members to be independent of the beverage industry, with a broader mix of skills and experience across waste and recycling, community, legal and financial expertise. AGW supports the objective of improving transparency, accountability and independence in the governance of the scheme.

However, AGW emphasises the importance of ensuring that industry representation remains appropriately balanced and reflective of those sectors that are directly impacted by, and contribute to, the scheme.

The wine sector is a significant participant in the beverage market and, where captured by CRS arrangements, contributes financially to the operation of the scheme. As such, it is essential that the wine industry has an opportunity to participate meaningfully in governance discussions and decision-making processes.

AGW notes that other beverage sectors are represented within the current governance framework. In this context, AGW submits that:

- the wine industry should have appropriate representation on the PRO board, or
- at a minimum, there should be formal mechanisms to ensure the wine sector's perspectives are consistently incorporated into governance and decision-making processes.

This is particularly important given the distinct characteristics of the wine sector, including:

- a large number of small and medium-sized producers, operating across multiple labels and vintages; and
- different consumption and recycling patterns compared to high-volume beverage categories.

Ensuring that these differences are understood at a governance level will support:

- more informed decision-making;
- better policy outcomes; and
- greater confidence from industry participants in the operation of the scheme.

AGW emphasises that effective governance is not only a function of independence, but also of relevant expertise and representation. Inclusion of the wine sector in governance arrangements will help ensure that the scheme

operates in a manner that is both fair and fit-for-purpose across the full diversity of the beverage industry.

Policy Consistency: Application of Container Eligibility Principles

AGW notes - with some irony - the evidence provided by Ms Claire Anderson during the public briefing regarding the rationale for excluding certain containers, including milk, from the scheme. These are arguments that AGW has consistently advanced since well before the expansion of the scheme in Queensland.

Ms Anderson stated that:

> *"A lot of them are collected through kerbside… which is where we're getting most of our recycling."*

She further noted that the scheme is intended to target containers that:

> *"are regularly seen in litter audits"*

and acknowledged that inclusion of additional containers would:

> *"add cost to beverage manufacturers… and that cost is passed on to consumers."*

AGW submits that this rationale applies directly to wine containers.

Wine bottles:

- are predominantly consumed on-premise and in the home;
- are effectively captured through kerbside recycling systems; and
- contribute less than 1% to the litter stream.

These are the exact considerations that historically underpinned the exclusion of wine from Container Refund Schemes, including prior to its inclusion in Queensland.

Accordingly, AGW submits that:

- the policy logic articulated by the Department should be applied consistently across all container types; and
- future decisions regarding the scope and operation of the scheme should be guided by clear evidence of environmental benefit relative to cost.

Need for Clarity in Regulation

AGW notes advice from the Department that the Regulation underpinning the exemption is currently being finalised but the working draft is unlikely to be released prior to the close of submissions for the Bill.

Given the importance of these details, AGW:

- Looks forward to reviewing the draft regulation once available; and
- Seeks the opportunity for further consultation on the practical implementation of the exemption.

Ensuring that the exemption operates as intended and delivers genuine relief to small producers will be critical to its success.

Conclusion

AGW supports the Queensland Government's intent to provide relief to small beverage manufacturers and acknowledges the positive step represented by the proposed 20,000 container exemption.

To ensure the measure achieves its intended outcome, AGW emphasises the importance of:

- Simple and low-burden reporting arrangements;
- Alignment with national harmonisation efforts, including the proposed single portal;
- Clear and practical regulatory guidance; and
- Ongoing engagement with industry during implementation.

AGW looks forward to continuing to work with the Queensland Government and COEX to ensure that the scheme operates effectively, efficiently, and in a manner that supports the sustainability of small and regional producers.

Contacts

For further information please contact:

Lisa Scott
Director, Government Relations

Level 1, The Realm
18 National Circuit
Barton, ACT 2600
Tel +61 411 133 294
Email lisa@agw.org.au