


## SUBMISSIONS MADE TO THE EPA BY INDIVIDUALS VIA EMAIL

1.	<p>I believe the following should be included in the currently excluded list:</p> <ul style="list-style-type: none"> <li>• plain milk in any container</li> <li>• wine and liquors in glass bottles</li> <li>• pure fruit/vegetable juice in containers of 1 litre or more</li> <li>• flavoured milk in containers of 1 litre or more</li> <li>• any beverages in containers greater than 3 litres.</li> </ul> <p>I am also in favour of having dedicated kerbside collections of the above.</p>
2.	<p>The current CDS registration and reporting process is outdated. It might be easier to mirror the future process off NSW and QLD who have a much more intuitive process in place that takes less time and effort.</p>
3.	<p>While the SA CDS scheme was the early adopter in Australia, and hugely successful, a few things have changed in recent years.</p> <p>Most critically, the proliferation of small producers, who produce new products frequently and in very small quantities, was likely not anticipated when the scheme was last reviewed.</p> <p>As a producer of regular small batches of craft beer, of which only 20-50 cases are sold in SA, the cost of a single registration (\$328.50) makes distribution in SA prohibitive. It is not viable to absorb, or pass on to consumers, a \$10-\$20 per carton surcharge in order to recover the cost of registration.</p> <p>The time and resources involved in registering new containers, both for the producer and the EPA, is also significant, and out of step with other states' systems.</p> <p>Other states provide a simple web portal to facilitate the registration of new containers, and the process takes only a minute or two.</p> <p>The cost to register new containers in other states is zero, or close to it.</p> <p>It would provide a level playing field and reduce the burden on all parties, if SA were to implement a similar approach to container registrations.</p>
4.	<p>My sincere apologies for my messy March emails, so I will keep this brief.</p> <p>This final group email and how I wrote and first sent my Brief Review is because for sustainability and a circular economy to work we must all work together. Cleanaway's recent April 2021 Recycling Behaviours Report found "Fewer than 2% of respondents assigned every item to the correct disposal method", and the ARL and soon to be only disposal method label on all our packaging is seriously flawed.</p> <p>There are already many thousands of erroneous ARLs, the "world leading" UN review did not research actual ARLs, the ARL is voluntary without national standards or accreditation, the ARL has no apparent naming convention, templates or review/approval process, with each ARLs' creation relying on the honours system, the ARL has never been properly reviewed, and I am not the first person to warn you of the ARL's flaws.</p> <p>But everyone has repeatedly ignored my email warnings, so from today I am forced to post publicly on social media. Also soft plastics after being edited out of the ARL education campaign in October has now missed its belated March/April inclusion.</p> <p>The often cited UN "Can I recycle this?" ARL "world leading" review and its case study were both theoretical with no experts or personnel in Australia nor actual ARLs. Below is my practical Research Methodology and the cause of my dire financial situation (now \$3,000 in new debt to estranged family).</p> 

## SUBMISSIONS MADE TO THE EPA BY INDIVIDUALS VIA EMAIL

	<p>My first 20 case studies taken from my Brief Review are now up on Twitter for #CheckIt Tuesday, and they merely scratch the surface.</p> <p>By the government's new fast-tracked December 2023 deadline the then total cost of correcting the ARL's recycling confusion and contamination, its environmental damage, and the 10,000s of erroneous ARLs on 10,000,000s of packagings, could be up to \$100,000,000.</p> <p>I am calling on the Hon Environment Minister Sussan Ley and the recycling industry to establish an Independent Review today.</p> <p>As that review may take time to set up, or may not eventuate, and I need an income immediately I am also applying to you for any suitable work of any kind, that ideally will not compromise my review objectivity, and am available to start and relocate today.</p> <p>Note: Yesterday ALDI announced trialing in-store soft plastic recycling.  <a href="https://www.aldiunpacked.com.au/aldi-australia-commits-to-a-zero-waste-future/">https://www.aldiunpacked.com.au/aldi-australia-commits-to-a-zero-waste-future/</a></p>
5.	<p>I think removing glass wine bottles from recycling bins is a must to stop contamination of the waste so glass can be recycled properly. Lots of plastic containers and bottles should also be included.</p>
6.	<p>Please find below my response to the discussion questions.</p> <p>1.1 – Yes</p> <p>2.1 – No, they should NOT be excluded because (1) they should be actively included in the circular economy by recovering them as reusable resources and (2) inclusion in the CDS will reduce litter and further protect the environment.</p> <p>2.2 – Diversion of ALL glass containers up to 3 litres from recycling bins to the CDS makes economic sense to the community as a whole, as well as increasing the reuse of these resources.</p> <p>2.3 – Yes</p> <p>2.4 – Yes. Point of purchase and rubbish bins are ideal places to advertise this. There needs to be multiple and easy-to-access depots for returning containers (vending machines have been used in some jurisdictions) if this is to be successful. However if not accessible, there will be people who remove containers from rubbish bins to make a living, so the impact of the CDS will not be lost.</p> <p>3.1-3.6 – Not applicable to me, however, I make the point that the greater good for the community needs to override any perceived short-term pain for beverage produces and suppliers.</p> <p>4.1.1 – The amount does not impact on my participation in the scheme, but it is my view that an increase in the deposit is likely to influence others to participate.</p> <p>4.2.1 – Ease of participation in the expanded CDS will be critical for its success. I support all options given. I suggest also parks and playgrounds, particularly those used often for picnics and similar events.</p> <p>4.2.2 – Yes</p> <p>4.2.3 – I will not influence me because I already take everything that is currently accepted by recyclers, but I think the proposal is a good idea.</p> <p>4.2.4 – Not applicable to me.</p> <p>4.3.1 – Cash, EFT to me and/or donation partner. I'm not keen on vouchers because they are not immediate and are restrictive.</p> <p>4.3.2 – No, but as the community moves away from cash, it provides a good option. Cash is important for those in the community who collect items with a deposit from rubbish bins to make a living.</p> <p>4.3.3 – Not applicable to me.</p> <p>4.3.4 – Not applicable to me, but I think this is a great option to support charities. For those who are indifferent to collecting a same amount from container deposits, they may be encouraged by the option of the refund being a donation to charity.</p> <p>5.1 – I have a preference for the single not-for-profit scheme coordinator.</p> <p>5.2 – I have no preference, but barcode seems appropriate.</p> <p>5.3 – I have no preference, but a centralised IT platform seems appropriate.</p>

SUBMISSIONS MADE TO THE EPA BY INDIVIDUALS VIA EMAIL

	<p>5.4 - 5.7 – I have no view to share on these issues.</p>
<p>7.</p>	<p>To whom It May Concern:</p> <p>The proposed payment of 10 cents per wine bottle returned, via the SA Container Deposit Scheme, is an excellent concept!</p> <p>This state, South Australia, has run the Container Deposit Scheme since 1977, turning over 44, 000 tonnes of waste soft drink bottles and cans for recycling each year.</p> <p>The Scheme has provided pocket money for diligent children and been a major fund-raiser for the Scouts and various sporting clubs for decades. Recycling centres already exist all around this state to handle returned bottles and cans, with the further handling of wine bottles to be a further extension of this well-oiled scheme.</p> <p>Our Container Deposit Scheme has been the envy of other states and adding this extra component will only enhance this further.</p> <p>Introducing this proposed addition should be a 'no brainer' for the SA Government, bringing further funds and accolades, while at the same time further reducing glass litter from our urban, suburban and rural environments.</p> <p>I imagine that this proposal will attract state-wide approval when it is introduced.</p>
<p>8.</p>	<p>Container Deposit Scheme (CDS) Review</p> <p>The review of the SA Container Deposit Scheme (CDS) is timely as the community considers further ways to move towards a sustainable future.</p> <p>I would like to strongly support an expansion of the South Australian Container Deposit Scheme (CDS) to include Wine and Spirit Bottles and large plastic Milk and Juice containers.</p> <p>The SA CDS has proven to be effective in the recycling of bottles, cans and plastic beverage containers, and in diverting these containers from landfill. The SA CDS scheme increases sustainability and protects the environment by removing containers from waterways, the ocean and the land. After many decades, the SA CDS has been (largely) followed in other jurisdictions.</p> <p>Wine and Spirit Bottles</p> <p>An expansion of the CDS to include wine and spirit bottles would increase the sustainability of these industries. Recycled glass uses far less resources than glass made from raw materials and is cheaper to manufacture. Current collection of glass containers by recycling companies and agencies such as Scouts SA can sort by colour and provide local (and interstate) glass manufacturers with a premium product for recycling and repurposing.</p> <p>Removing glass wine and spirit bottles from the yellow household recycling bins would mean less broken, mixed colour glass arriving in recycling centres. Broken glass can also reduce the recycling rates of other items in the yellow recycling bins. Wine and spirit bottles that are placed in the landfill bins are removed completely from recycling options.</p> <p>Wine and spirit manufacturers could add the recycling of wine bottles, through a CDS, to their list of environmentally friendly credentials. The extra cost to the consumer is nominal, especially when considering the median price of wine and spirit products.</p> <p>Labelling could be generically worded such as “10 cent deposit in states or territories where CDS applies”, thereby ensuring that as jurisdictions move towards CDS for wine or spirit bottles, that labels comply without the need for amending.</p> <p>If other states or territories introduced a CDS for wine or spirit bottles before SA, wine or spirit manufacturers would need to be compliant if they sought to export to that state or territory. A Container Deposit Scheme for wine and spirit bottles in SA would see our State ahead of the curve in recycling-a space we like to occupy.</p> <p>As an additional benefit, removal of much / most of the glass wine and spirit bottles from yellow household recycling bins through the CDS, would mean there was little reason to consider a costly and resource intensive 4th bin for household glass.</p> <p>Large milk and Juice containers</p>

SUBMISSIONS MADE TO THE EPA BY INDIVIDUALS VIA EMAIL

	<p>I would also support a CDS for large milk and juice containers to increase the recycling rates of these containers. Valuable resources are lost when these containers end up in landfill, or are discarded in the environment.</p> <p>Vending machines for CDS items</p> <p>I am less inclined to support the introduction of vending machines for recycling of CDS items in SA. Vending machines are resource intensive and expensive machines and add a whole new component to the scheme. We already have established businesses and agencies that collect and arrange for the recycling of CDS items. Many community groups and sporting groups rely upon a simple low cost CDS collection system as a vital fund raising tool. Businesses engage other businesses to remove items for recycling. Individuals supplementing their income, act as informal conduits of CDS items from the community to recycling depots. Families take items to recycling depots in bulk.</p> <p>This is not to suggest that there aren't refinements that could be made to the collection of CDS items - I accept that there may be changes that would assist in increasing recycling rates. However I don't believe that to retrofit vending machines to our scheme would enhance the scheme, but rather they would be a costly and resource intensive impost on the scheme.</p> <p>I trust that these submissions are of use in your review of the CDS. Please don't hesitate to let me know if you wish any further submissions.</p>
9.	<p>I fully support of extending the container deposit to all drink and wine containers regardless of size.</p> <p>To encourage recycling, facilities should be available in places where people shop and recreate - for example, large entertainment and sporting venues, and parks.</p> <p>A higher refund amount would encourage more recycling.</p>
10.	<p>I support the proposed changes to the Container Deposit Scheme.</p> <p>For the sake of our environment, I believe it is imperative that we significantly reduce (preferably eliminate) the amount of containers and packaging currently going to landfill.</p> <p>This can be achieved in part by expanding the Container Deposit Scheme to include, in particular, glass bottles and jars, plastic bottles and jars, washing liquid containers.</p> <p>Removing glass bottles and jars, (especially wine bottles) from recycling bins would reduce the contamination of paper and cardboard that currently occurs through breakage of those glass items. It would also reduce the cost to Local Councils for bin collections and waste disposal.</p>
11.	<p>Hi, For too long we have been caving in to the whining of vested interests in the alcohol and beverage industry. It is high time that we bite the bullet and put a refund on all recyclable beverage containers. It makes no sense to be throwing perfectly good recyclable material into land-fill simply because there is no perceived value to the end user in returning. it. The more of this type of material that can be returned for recycling the better. If adding a small return deposit to the container will achieve that end, then I'm all for it. I would consider going further than the containers suggested and include all glass and recyclable plastic</p> <p>condiment containers as well (ie, jam jars, sauce bottles, spreads, pickles etc). Far too many of these containers are ending up in land-fill as well. Thank you</p>
12.	<p>Strongly agree to including wine bottles but also to all types of containers that can be recycled: juice, milk, jars and cans. I cannot comment on the deposit price as fo not have the inside information but I trust that this will be set at the optimum amount.</p>
13.	<p>The Container Deposit Scheme should be expanded beyond Food and Drink Containers. It should also cover All Containers/Bottles etc. such as Sauces, Vinegars, Mayonnaise plus Laundry and Dishwasher Detergent bottles, Disinfectant, Methylated Spirits, White Spirits, Turpentine, Bleach, Fabric Softeners, Liquid and Powder Pool Chlorines. It should be expanded so that ALL larger containers, 2 litres and above, should have a 20cents deposit. We should also apply the Deposit Scheme to Paint, Motor Oils</p> <p>etc. Manufacturers cannot complain that they will go broke for the entire system has become "Self-Funded" as the Public pay for it every time we buy most Drink containers etc.</p>

SUBMISSIONS MADE TO THE EPA BY INDIVIDUALS VIA EMAIL

	<p>It has taken many years but the SA system is catching on both in Australia and overseas (Ireland and the UK had a Deposit Scheme during WWII but scrapped it. Both are now, if they haven't already put it in place, considering introducing and expanded SA Scheme.</p> <p>The more items which become subject to the Container Deposit Scheme the less will go into Landfill, our rivers, waters, seas which will help clean up the world Action An Even Broader Container Deposit Scheme applied to ALL Containers with a 20cents deposit on All Containers over 2 litres - including Motor Oils, Cleaning, Shampoos, Shower Gels. Detergents, Bleaches - everything. It could work and people would get used to it.</p>
<p>14.</p>	<p>Dear EPA, Having read the discussion paper I heartily endorse increasing both the range of containers being included and the size of the deposit.</p> <p>Given the cheapest drink of any form is over \$2 in most retail outlets I think a deposit of 20 cents is the lowest it should be - in fact given the need to future proof the scheme I think 50 cents would be more appropriate. If it were possible to make this into a National scheme it would be even better. It would simplify labelling and avoid the risk of smuggling containers across state the borders. Another consideration is that a greater number of containers with better deposits will help those who supplement their incomes by returning empty containers - it is a dirty and otherwise thankless task!</p>
<p>15.</p>	<p>Dear Sir or Madame, I wish to support the introduction of broadening the scope of containers, bottles and cans that are currently included in the scheme. I support the introduction to the scheme for wine bottles, spirits, fresh fruit containers and other common beverage containers, particularly the plastic drink containers used by McDonalds, Hungry Jacks and other fast food outlets. I am mindful that currently sauce bottles, etc are excluded and they need to be investigated as well, to help overcome the issue of broken glass in the yellow bins.</p>
<p>16.</p>	<p>I fully support 10c refunds on more bottles To reduce use of plastics and encourage recycling and continue the good program here in SA.</p>
<p>17.</p>	<p>SA landfill Hello I am writing to inform you that waste management sites in Queensland at landfill and waste disposal sites encourage people to voluntarily separate scrap metal and recyclables for land fill material. This is called the Waste Transfer System. This System appears to work much better. This is a much smarter, and somewhat more profitable system. Waste Transfer Sites in Queensland appear much cleaner and more well organized. Alternative waste appears to simply get shredded and compacted at some sites which appears to work much better and be much more cheaply managed. This appears to be somewhat more Profitable as well. The Waste Transfer System drastically reduces landfill input, eliminating large amounts of waste by voluntary separation. This system is much better. This makes much more sense than the general land fill system used in the SA and would be more productive for the SA sites to pick up on the Queensland Waste Transfer System as it appears to be much smarter and more efficient. Installing industrial shredders and compactors eliminates almost all of the waste that goes to landfill. This is better for the environment.</p>