

8 July 2021

Container Refund Scheme  
Department of Primary Industries, Parks, Water and Environment  
[CRS.Enquiries@dpiuwe.tas.gov.au](mailto:CRS.Enquiries@dpiuwe.tas.gov.au)

To Whom It May Concern

***Submission on the draft Container Refund Scheme Bill 2021***

TasCOSS welcomes the introduction of a Container Refund Scheme (CRS) and the potential it provides for social benefit beyond the environmental benefits of recycling.

TasCOSS is the peak body for the community services industry in Tasmania. We represent the interests of individuals and organisations active in the provision of community services to low-income Tasmanians living in vulnerable and disadvantaged circumstances.

We view the establishment of a CRS in Tasmania as a unique opportunity for community organisations, charities and not-for-profit organisations (NFPs) to participate in and benefit from significant revenue raising, business opportunities, industry training and job creation.

While we acknowledge the draft Bill does provide opportunities for community groups, charities and NFPs to participate in the scheme, we consider this opportunity should be prioritised and participation maximised, rather than just enabled.

To realise these opportunities, TasCOSS considers the draft legislation could be improved by preferencing a Community Producer Responsibility model, similar to the models operating in other states (SA, WA, QLD & NT). The model design in the draft Bill lends itself to a large, monopoly, waste company operating as a single network operator, with a focus on profit rather than the scheme's objectives.

A Community Producer Responsibility model is preferred by our industry members as it establishes a NFP entity as the scheme coordinator and enables community groups, charities and other NFPs to choose to take part by directly contracting with the scheme coordinator and receiving the full benefit of their participation. By contrast, the system proposed in the draft Bill will see the network operator determining the organisations it contracts with and sharing in their revenue.

We urge the Government to reconsider the operating model provided for in the draft Bill and further explore the potential for a Community Producer Responsibility model. TasCOSS would be pleased to facilitate a meeting of our industry members with the Minister and/or Department to discuss practical ways to enable this model to be implemented.

TasCOSS looks forward to community groups, charities and NFPs maximising the potential from a CRS for the economic and social benefit of the Tasmanian community.

Yours faithfully



Adrienne Picone  
**Chief Executive Officer**