

Health, Environment and Innovation Committee:

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

Australian Beverages Council Limited

15 April 2026





The Australian Beverages Council Limited (ABCL) is the leading peak body representing Australia's non-alcoholic beverages industry.

For over 75 years, the ABCL has been the only dedicated advocate for this industry, representing approximately 95 per cent of the industry's production volume. Our members range from Australia's largest drinks manufacturers to small and micro beverages companies whose drinks are enjoyed nationally as well as around the world. These beverages include carbonated soft drinks, energy drinks, sports and electrolyte drinks, frozen drinks, bottled and packaged waters, 100 per cent juice and fruit drinks, cordials, iced teas, ready-to-drink coffees, kombuchas, flavoured milk products and flavoured plant milks.

Collectively, the ABCL's members contribute more than \$1.2 billion annually to the Queensland economy, supports more than 9,000 full time equivalent employees and every direct employee in the beverages manufacturing industry creates 4.9 jobs elsewhere in the economy to produce and retail our drinks. Put simply, our industry creates jobs for Queenslanders, especially in regional parts of the state.

Internationally, the ABCL is proud to contribute its sustainability commitment and knowledge through leadership in the International Council of Beverage Association's Asia Pacific Regional Group (ICBA APAC), and through active participation in the Australian, New Zealand and Pacific Islands (ANZPAC) Plastics Pact. The ABCL also contributes to international sustainability policies through participation in the sustainability committees of the International Fruit and Vegetable Juice Association and International Council of Bottled Water Association. The ABCL is an accredited observer to the United Nations Environmental Programme, and are an active observer participant in the Intergovernmental Negotiating Committee on Plastic Pollution process.

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

Our Members include:



ASAHI BEVERAGES

Recommendations

1. Retention of industry-led Extended Producer Responsibility scheme.
2. Independent governance of Producer Responsibility Organisation appointed by the government to operate the scheme.
3. Removal of Ministerial authority to appoint a “special manager”.
4. Removal of Ministerial approval of the Governance and Capital Investment Plan.
5. Commit to measures that will increase access for out-of-home and on-the-go consumption such as mandatory sortation in government workplaces and facilitates, separation of containers in multi-unit dwellings and allowance of participation at public events and hospitality, retail and catering settings.
6. Address barriers to establishment of additional return points including planning policies that restrict the installation of Reverse Vending Machines.

Executive Summary

The non-alcoholic beverages industry remains committed the growth and success of Australia's container refund schemes (CRS) and our extended producer responsibilities. As stewards of Australia's CRS, our industry has been at the forefront of product stewardship in Australia and remains steadfast in our commitment to the environment and sustainability.

Our industry supports an effective, well-governed CRS that operates efficiently, meets its objectives of reducing litter and improving recovery of containers while maintaining public confidence and delivering value to consumers. Best practice extended producer responsibility (EPR) schemes around the world model government as the regulator, industry as the funder and a not-for-profit Producer Responsibility Organisation (PRO) as the manager of operations for the scheme.

The ABCL endorses this approach and, at a time of national discussion regarding both the national harmonisation of CRS more broadly and the expansion of EPR to other industries, encourages any reforms to Queensland's CRS to recognise that this is the predominantly used and most effective model.

We do recognise there are improvements that can be made to the scheme, and in our [submission](#) to the Inquiry into Improving Queensland's Container Recovery Scheme, outlined a number of reforms that would make the scheme more accessible to consumers and improve the convenience of return points. As funders of the scheme, and the party that would be financially liable for an increase in return point infrastructure, that is a key objective of our industry. It is imperative that any reforms to the scheme are underpinned by a commitment to bring the availability of CRS return points in line with the most successful schemes in Europe, which boast infrastructure densities of one return point to 500-2000 residents¹. In comparison, Queensland currently sits at one return point per approximately 14,000 residents².

The ABCL acknowledges the government's support, or in principle support for 20 of the 21 recommendations from the Parliamentary Inquiry. We welcome the decision to rule out an increase to the refund amount.

The ABCL supports stronger reporting and accountability that builds capacity to deliver the scheme's objectives and enhances public confidence in its administration. However, the industry is concerned that proposed changes would shift the scheme from a producer-led EPR, overwhelmingly the most successful model, to one subject to greater, and irregular, government control that will increase complexity and red tape.

This includes the power of the Minister to appoint a "special manager" and approval of a "Governance and Capital Investment Plan" to discharge funds accumulated by the PRO.

¹ <https://www.reloopplatform.org/resources/global-deposit-book-2024/>

² <https://containerexchange.com.au/queenslanders-recycling-celebrated-as-scheme-approaches-major-milestone/>

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

These changes would undermine the independence of the PRO and negate the role and experience of the PRO's Board as the decision-making body. This model would also be inconsistent with any other EPR scheme operating in Australia.

The Inquiry into Improving Queensland's Container Refund Scheme was an important opportunity to identify best-practice EPR models and propose reforms that would increase the recovery of containers. It is not clear that the recommendations from the inquiry nor the government's response seek to address these concerns but rather propose significant changes to the operation of the scheme without addressing the substantive issues that present barriers to improving the scheme's performance. Refinement of the proposed legislative response presents an opportunity to achieve the desired intentions of a more transparent and effective scheme.

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

The ABCL understands the Queensland Government's intent to improve performance of the state's CRS through the *Waste Reduction and Recycling (Strengthening the Container Refund Scheme) Amendment Bill 2026*. As stewards of the CRS, beverage manufacturers have been at the forefront of EPR schemes in Australia and are uniquely positioned to provide advice and guidance to government on opportunities to improve them. From a practical perspective, our industry has a direct interest in increasing the recovery of containers so that we can purchase more recycled material to use in creating recycled beverage containers.

As detailed in the ABCL's submission to the Parliamentary Inquiry into Improving Queensland's Container Refund Scheme, there are a number of interventions available to government to work collaboratively with industry and the PRO, COEX, that will effect important changes.

With a renewed focus on out-of-home and on-the-go collection points, the scheme can achieve a greater recovery of containers. The clear evidence internationally is that a higher density of return points contributes significantly to a higher rate of return. The current reforms proposed in this legislation do not address these concerns. Increasing consumer convenience is a critical, long-standing issue that would provide significant opportunity for consumers to engage in the scheme and bring about the desired outcome of increasing the return rate.

As it stands, the barriers posed by current planning regulations have not been addressed in these proposed changes. Establishment of additional Reverse Vending Machine (RVM) sites and other collection points is essential to improving convenience of participating in the scheme, yet these issues have not been addressed in the proposed reforms.

In addition, there has been no commitment to the remainder of recommendation 12(a), increasing scheme participation in corporate and government workplaces, and multi-unit dwellings. These spaces, coupled with other public out-of-home settings, are consistently found to make up the majority of unredeemed containers in the system. Positively, this is where the government can play an important part in increasing recovery rates, and lead by example by demonstrating a commitment to increase collection in its facilities. Without addressing these fundamental issues, the scheme is unlikely to experience improvements to its performance and fail to meet clear expectations from the government, consumers and beverage manufacturers.

Our industry appreciates the government's immediate action to provide relief to small beverage manufacturers and welcomes the urgency with which this has been implemented.

Independence of the Producer Responsibility Organisation

The ABCL broadly supports opportunities to strengthen governance, accountability and transparency of the PRO. Fixed terms, audit requirements, reporting obligations, and performance expectations are important steps that will build a stronger framework, improving public trust and confidence in the PRO.

However, the scheme remains an EPR model fully funded by beverage manufacturers and should therefore preserve the meaningful role of a Board of Directors appointed with both experience in beverage manufacturing and relevant independent skills that support the effective administration of the scheme. A governance model that is distant from scheme funders and operational participants would reduce practical effectiveness, with decision-making removed from the realities of participation in the scheme as it relates to pricing, supply chain and producer obligations.

The ABCL cautions the granting of Ministerial powers that seek to exert greater than necessary oversight of the independent, not-for-profit PRO. This includes the ability to appoint a “special manager” with significant interventionist powers. Apart from introducing unnecessary additional red tape, the legislation does not provide industry with confidence that this role will not be used to effectively remove the role of beverage manufacturers in the administrative decision-making process and transfer the PRO into a government-run entity. Such a change will lead to an erosion of the best-practice approach, minimise the role of industry and has the potential to lead to cost increases which will ultimately impact consumers at the shelf.

Use of Scheme Funds

In an ideal scenario, the PRO should be operating on a balanced budget with any surplus funds reinvested directly in the scheme to improve its performance. The accumulation of funds levied against beverage manufacturers and unredeemed by consumers is not a desirable circumstance but a reality of the previous constraints on scheme fund allocation, operating an EPR scheme in a geographically vast state, and the above-mentioned barriers to consumer participation.

The ABCL supports the use of these funds in targeted initiatives that boost the recovery of containers, enhance scheme-owned infrastructure and enable critical supporting contracts such as those in transportation of scheme materials. COEX has already undertaken a number of initiatives to address barriers to participation and worked with the network of return points to develop innovative solutions, including in hard-to-access and remote areas, often at a financial loss to the scheme. It is critical that these funds are not used for alternative purposes that deviate from the core function of the PRO and its remit as the organisation charged with managing the scheme and its infrastructure.

To that end, the ABCL does not support Ministerial approval of a Governance and Investment Plan but rather the retention of this responsibility by the Board, with functional responsibilities under the Corporations Act, appointed to govern the PRO.

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

The Board of the PRO is appointed with relevant experience in the beverage manufacturing industry, complemented by independent members with identified skills. It is therefore best placed to make decisions regarding use of these funds to increase recovery rates, recognising the lived experience of managing and operating within the system of the scheme. The government, should it choose to action the critical items in recommendation 12, could influence the same functions by coupling these actions with a return point target in regulation, similar to the one found in Western Australia.

Unit of Public Administration

As an EPR scheme, the PRO is not a government entity but rather appointed by government to administer a scheme funded by beverage manufacturers. Recognising there were concerns raised throughout the inquiry regarding the historical conduct, the ABCL understands the need to ensure the PRO meets its obligations and is performing its functions in accordance with requirements set out in the legislation that establishes the scheme. However, treating the PRO as a Unit of Public Administration, in addition to many actions outlined above, is a step towards more formalised government administration of the PRO, which we submit is out of step with the international schemes Queensland seeks to emulate.

With no government funds to support the operation of the PRO, it is imperative that the intent is clearly defined and implemented with robust governance arrangements in place so as to not unduly burden beverage manufacturers with greater costs of complying with these additional oversight and compliance measures.

Conclusion

The non-alcoholic beverage industry is committed to best-practice EPR schemes that drive circularity, improve recycling outcomes and reduce litter. Through CRS, our industry has been at the forefront of product stewardship and continues to contribute to a national conversation as Australia looks to expand producer responsibility schemes.

The Queensland Government has a clear objective to improve the performance of the state's scheme and lift the recovery rate. Unfortunately, the proposed legislation does not address the structural challenges faced by the scheme and fails to make it easier for consumers to participate. Instead, the reforms would shift the scheme from an effective, industry-led model to one subject to greater, irregular, government control. This is likely to contribute to higher costs for beverage manufacturers and, ultimately, higher costs for consumers.

The ABCL strongly recommends that government refine the current legislation to ensure that the appointed Producer Responsibility Organisation has a clear, independent governance structure with autonomy to make decisions regarding the operation of the scheme in the best interest of consumers, beverage manufacturers and the environment. Any use of scheme funds must be for the sole purpose of targeted interventions that improve access for consumers to participate in the scheme and support the establishment of additional scheme-owned infrastructure.

Should the legislation progress in its current form, it is unlikely that the scheme will achieve any demonstrable improvement in its performance, as it does not address the barriers that restrict access and convenience to participate in the scheme. This is an undesirable outcome for industry, consumers and the environment.