Local Government Association Tasmania

Our Ref: BM | LR

15 April 2025

Jakob Sprickerhof
Senior Project Officer
Strategic Projects and Policy
Department of Natural Resources and Environment

Sent via email: jakob.sprickerhof@nre.tas.gov.au

Dear Jakob,

Container Refund Scheme – Material Recovery Facility Protocol

Thank you for the opportunity to provide a submission on the draft Material Recovery Facility Protocol (version 4.3). This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of Tasmanian local government in collaboration with our members; all 29 councils.

LGAT is the representative body and advocate for local government in Tasmania and is incorporated under the *Local Government Act 1993*. Where a council has made a direct submission to this process, any omission of specific comments made by that council in this submission should not be viewed as lack of support by LGAT for that specific issue.

Firstly, I must note our deep disappointment with the timing and duration of the consultation on this protocol. The consultation on the first draft was in July 2023, with the current draft being released 20 months later and only weeks before scheme commencement. Due to the lateness, only three weeks have been provided on a document that will set the foundation for multi-million-dollar agreements between councils and Material Recovery Facilities (MRFs). This is unsatisfactory.

Tasmanian councils have been very strong advocates for a container refund scheme (CRS) and LGAT has actively contributed to its development. The local government sector recognises the statewide benefits of reduced litter and increased resource recovery and strongly believes that producers must take responsibility for their products. For the CRS this means that the scheme operator and consumers of the products should bear the costs of running the system. We support the default 50/50 share of revenue between local government and the MRF and broadly the methodology of calculation.

We offer the following refinements from the Western Australian system as described in the *Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations 2019*

(WA) and the *Local government sharing protocol: Container deposit scheme*, for fairer producer cost allocation and transparency:

- The Scheme Coordinator should bear the cost for any baseline audit of the containers held by the MRF operator prior to the agreement between the MRF Operator and the Scheme Coordinator.
- Councils, should be able to claim for administrative costs in connection with the CRS where these have not been paid by the Scheme Coordinator.
- To provide consistency in costs and to provide confidence, the Section 6.2.1 audits in the draft Protocol, should be fully detailed by the Scheme Coordinator, including the independence of the persons undertaking the audits.

Please contact Ben Morris, ben.morris@lgat.tas.gov.au, 6146 3743 if you have any questions or would like further information.

Yours sincerely,



Dion Lester
CHIEF EXECUTIVE OFFICER