

**From:** Tom Lee [REDACTED]  
**Sent:** Monday, 10 September 2018 1:21 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Western Australian container deposit scheme [UNCLASSIFIED]

Hi Chris,

Thank you for bringing to our attention the consultation RIS document for the Western Australia container deposit scheme. I have reviewed the document and have made the comments below for your consideration. Just for some context, when considering exemption requests, our role is to advise our minister on the impacts of a potential exemption on New Zealand, which is where our focus lies when reading the RIS.

In looking at your analysis of the issue, it is clear the objectives you are trying to achieve and it is good to see a discussion of other options the WA Govt looked at for tackling the problem. As proposed, the scheme looks like it will benefit both the WA Govt and the environment.

The approach in the paper is similar to those that NZ has seen before in the RISs of other Australian schemes. I think the assumptions are generally fair, for example, that costs are most likely to be passed on to consumers. One thing that it would be useful to see, if possible, is whether there has been any work undertaken in Australia on whether this assumption has held true for other states' schemes so far. From NZ's point of view, we are mostly interested in the impact on our local beverage producers, so if there is any evidence available to support this assumption, that would be useful. Linked to this, your assessment is that there will be zero impact on the beverage industry and that costs will be negligible is understandable, however if there is evidence to support this theory that would be useful. We are hesitant to agree that there will be zero impact on the industry and beverage producers, though agree that most costs will be passed on to consumers.

In your discussion of requiring a TTMRA exemption because there are regulatory requirements that need to be upheld for the scheme to work, it would be useful to add a comment in the paper (either in section 1.3 or 3.1 perhaps?) that provides a little more detail about what would happen if a TTMRA exemption did not occur. I note that currently it is written that no exemption means no scheme, so some reasons that elaborate on why this is the case will help our analysis/argument on why a TTMRA exemption is necessary.

It is good to see consideration of New Zealand in your impact analysis, notably the information and statistics on page 30. This type of information is vital for us to inform ministers/NZ Govt on the impacts of the scheme. It is also pleasing to see that the WA scheme is consistent with the other schemes in place in Australia, as this should help with compliance and ease impacts on beverage producers.

Finally, just a couple of minor points. Note that in a couple of places (pages 4 & 7 for example) you refer to the successful permanent exemption of the NSW scheme. I assume this means under the Australian MRA, but please note that at this stage under the TTMRA the NSW scheme has not yet been given permanent exemption status (that process is currently ongoing). Also, in footnote 30, I think the word "million" needs to be added after "1,300".

Thanks again for the opportunity to comment. I'm happy to continue to engage with you on this matter, so please feel free to ask any questions, comments, etc., if necessary.

Kind regards,

**Tom Lee**

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