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Submission: I think the recommendation to move to arrears billing is a great one. The Queensland CDS will start with arrears billing in November. By the time Qld suppliers get their first invoice NSW suppliers were about to receive their third invoice.

We are now 10 months into this NSW scheme and still EfC and/or the NSW EPA have not or will not release total sales and kerbside return numbers which would identify the numbers of unredeemed deposits which look like being 1-1.2 billion in the first year of the scheme. Where has the money for those unredeemed deposits gone!!!

Another issue with Material Recovery Facilities (MRFs).

With the advent of this scheme we now have council MRFs via kerbside yellow bin returns competing with Tomra/Cleanaway (R&E returns) to sell CDS returns into global and local markets.

No problem with that concept except kerbside redeemers have to pay R&E admin and handling fees in the purchase of their product to pay for a service they do not use.

I suggest those 2-3 cents kerbside subsides R&E collections is passed back to kerbside MRFs to either share with councils or to put it towards allowing for infrastructure to provide a less contaminated MRF product to be sold. This should allow the MRF to compete with Tomra/Cleanaway with a product of equal quality.

Moving the subsidy from R&E to kerbside will increase overall costs UNLESS the 2-3 cents deviation is achieved via a R&E deposit reduction to 7-8 cents.

Why should kerbside users have to pay R&E admin and handling costs when their MRF is competing with Tomra/Cleanaway to sell the returned CDS container.

Another possible issue.

Tomra/Cleanaway is the R&E MRF but Cleanaway is also a kerbside MRF.

That seems a conflict of interest what is in place to stop Cleanaway moving product between itself and Tomra/Cleanaway via transfer pricing to best suit the organisations. ie; T/C sells CDS stockpile to C/away MRF which takes a loss which it passes onto kerbside councils via