



## AUSTRALIAN CHAMBER OF COMMERCE AND INDUSTRY

31 August 2009

Senator Anne McEwen  
Senate Standing Committee on Environment, Communications and the Arts  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Senator

**Inquiry into the Environment Protection (Beverage Container Deposit and  
Recovery Scheme) Bill 2009**

I write on behalf of the Australian Chamber of Commerce & Industry Food Working Group, whose members comprise senior industry representatives in the food manufacturing and food service industries.

We note the Senate Standing Committee on Environment, Communications and the Arts' inquiry into the above bill and subsequent hearings that have begun this week.

ACCI would like to express our concern regarding the introduction of a national beverage container deposit recovery scheme without a thorough cost benefit analysis and comprehensive regulatory impact statement. ACCI is of the view that any new legislation should be subject to such analysis to ensure it does not detract from the promotion of an internationally competitive economy. The current financial climate heightens the need for cost benefit analyses as business can ill-afford substantial compliance costs that can arise from compliance with new legislation.

One concern of industry in relation to the *Environment Protection (Beverage Container Deposit and Recovery Scheme) Bill 2009* is the new labelling requirements that would arise as a result of its implementation. Supporters of the scheme maintain that the labelling changes are not substantial, however any labelling changes involve significant costs to business. Small businesses which in some cases purchase labels in bulk several years ahead in order to reduce costs will be particularly affected.

I would urge the Senate Standing Committee on Environment, Communications and the Arts to consider the full range of implications of such a scheme in its deliberations.

Yours sincerely,

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