



ACT
Government

Transport Canberra
and City Services

Dear Mr Whitby,

Re: AA1000536 – Paintback Limited – Submission

Thank you for your letter of 05 January 2021 inviting comment on the application for authorisation from Paintback Limited to continue a voluntary, national paint product stewardship program which aims to increase the recycling rate of end-of-life paint and paint containers.

ACT NoWaste is supportive of Paintback and we acknowledge the work undertaken to date to administer the scheme on behalf of the paint industry to minimise the environmental, health and safety impacts of paint and paint containers disposed of in Australia.

The scheme remains a suitable model for paint and paint container stewardship at this time and we believe that Paintback as an industry-led organisation has delivered value in continuing to progress the scheme.

We consider that there is significant benefit to the community from the paint and paint container collection and recycling service enabled by Paintback. Last year over 231 tonnes of paint and containers were collected from our sites in the ACT. The scheme allowed these materials to be recycled or responsibly disposed of, and ensured the local environment was not impacted. We understand the scheme operators and subcontractors have satisfied all legislative and regulatory requirements in the ACT in conducting their recycling and waste transport activities and have also been responsive and helpful in interactions with site managers.

Benefits of Paintback recycling scheme

Through its objective and goals, Paintback provides the following benefits:

- increased resource recovery and recycling, and minimisation of the environmental, health and safety impacts of end-of-life paint and paint containers disposed of in Australia;
- acknowledgement of the inherent value of all end-of-life paint and paint containers across Australia;
- recognition that there is a cost associated with ensuring the environmentally sound use of end-of-life paint and paint containers across Australia;
- commitment to market-based solutions for environmentally sound end-of-life paint and paint containers management;
- commitment to achieving the highest value end use possible for end-of-life paint and paint containers in accordance with the waste management hierarchy; and
- support for relevant policies and legislation and compliance with relevant laws and practices, including those that apply to the environment and occupational health and safety.

Public benefits

The scheme is also designed to deliver a range of benefits for individual participants, the paint industry as a whole and for the community. These include:

- increased use of a paint and steel resources currently being disposed of as waste;
- reduction in the number of paint and paint containers not going to an environmentally sound use/disposal;
- increased community access to appropriate end-of-life paint and paint containers disposal across Australia;
- creation of new markets for end-of-life paint through research and development; and
- increased consumer awareness of the impacts of end-of-life paint and paint containers disposal, and enhanced credibility for the paint industry through demonstrated leadership in environmental management and adoption of corporate social responsibility strategies.

Continuation of the Paintback Stewardship Scheme

There is national public interest in the continuation of the Paintback Stewardship Scheme. To be successful, it is important that the scheme is administered by an industry-led organisation such as Paintback. End-of-life paint and paint container stewardship must be led from within industry to deliver an effective program, with Federal and State and Territory Governments providing input and oversight to ensure compliance with relevant legislation, regulation and practices, including those that apply to the environment and occupational health and safety.

If the ACCC does not provide authorisation to Paintback there will likely be a continuing reduction in the amount of paint and paint containers disposed of appropriately resulting in potential for significant environmental and economic impacts.

Kind Regards



Anthony Haraldson
Acting Executive Branch Manager, ACT NoWaste