

1 November 2024

**Opportunities in the circular economy**

Productivity Commission

Dear Commissioners,

**RE: Container Exchange (COEX) Queensland submission on opportunities in the circular economy**

Thank you for the opportunity to provide a submission to the Productivity Commission's inquiry into the future of Australia's circular economy. As the operator of Queensland's **Containers for Change** program, COEX has played a pivotal role in advancing circular economy practices by expanding container recycling across the state. COEX's governance and operating model set a new standard for container refund schemes in Australia, breaking new ground that has influenced the development of more recent schemes. Our commitment to improving Australia's circularity outcomes aligns with the Commission's focus on productivity, waste reduction and resource efficiency.

Since launching in 2018, **Containers for Change** has diverted over **184,791 tonnes of material from landfill** and returned over **\$900 million** to Queenslanders, highlighting the **economic and social benefits** of circular economy initiatives. Our experience shows how harmonising schemes, improving data reporting and incentivising **local recycling infrastructure** can significantly enhance national productivity while reducing environmental costs. We strongly recommend the Commission considers the following opportunities:

- **Greater national harmonisation** of container deposit schemes at a strategic level to streamline operations and increase participation.
- Establishing **national material standards** to ensure high-quality, easily recyclable materials remain in circulation longer, enhancing material recovery and reducing downcycling.
- Mandating circularity where possible so that **materials recovered from containers go back into containers**.
- Investment in **onshore processing capacity** and **R&D** to develop more sustainable and commercially viable recycling technologies, especially for materials like plastics and liquid paperboard.
- Encouraging all governments to lead by example and **mandate participation in container recycling across government workplaces and in all government facilities**.

As container refund schemes expand nationwide, including to Tasmania in 2025, Australia is well positioned to lead in circular economy practices. COEX's experience in Queensland demonstrates the **potential for economic growth, job creation** and **reduced waste management burdens** through effective circular initiatives. We welcome further consultation with the Commission and look forward to its final recommendations.

Thank you once again for the opportunity to contribute to this important inquiry.

Yours faithfully,

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# 1. Circular Economy Success Stories and Measures of Success

COEX is an example of best-practice implementation of circular economy principles in Australia's container recycling sector. The success of the scheme is demonstrated by its growing **recovery rate**—the percentage of containers sold that are returned for recycling—its **social impact**, including in remote First Nations communities, and its **economic impact**.

The Queensland Government has set a target recovery rate of **85%**, which COEX is committed to achieving. In the 2023-24 financial year, COEX achieved its **largest year-on-year uplift** in recovery rate since the scheme's launch, capturing **67.4% of all eligible containers**, up from **63.5%** the previous year. This improvement was driven in part by an increase in glass volumes following the Queensland Government's nation-leading expansion of the scheme to include wine and spirit bottles, along with growth in strategic initiatives targeting both in and out of home container consumption.

## 1.1 Environmental Impact

- **High Material Recovery Rates:** COEX's closed-loop glass recycling system achieved an **88% recovery rate** for eligible glass containers in FY24, with **over 75% of returned glass remanufactured into new bottles**, a truly circular outcome. In South Australia—where the container recycling scheme has been running since 1977—an 84% recovery rate for glass was achieved. This demonstrates the system's effectiveness in maximising resource productivity by reducing reliance on virgin materials and promoting efficient resource use, both of which are key drivers of productivity. Glass—which can be recycled infinitely—is a particular exemplar of closed-loop recycling.
- **Reduced Environmental Costs:** By processing all collected glass within Queensland, COEX minimises the carbon footprint associated with transportation. All bottles returned through Containers for Change from Bundaberg south to the state border—more than three quarters of the scheme's total glass—are recycled back into bottles at facilities in South East Queensland. This localised processing not only reduces emissions, but also lowers transportation costs, enhancing the cost-efficiency of recycling operations and contributing to broader productivity gains. Facilities in **Cairns, Townsville** and **Rockhampton** convert returned glass into valuable products such as road base and insulation, avoiding the environmental impact of transportation to facilities in Greater Brisbane.
- **Circular Economy Expansion:** In FY24 the scheme diverted **184,791 tonnes of material from landfill**, saving **2.6 million kilolitres of water**—the equivalent of more than 1,000 Olympic swimming pools—and preventing **320,000 tonnes of CO<sub>2</sub>-e emissions**—equivalent to removing **139,000 cars** from the roads. These environmental achievements bolster Queensland's economic sustainability by reducing future remediation costs, providing a long-term productivity benefit.

## 1.2 Economic Impact

- **Increased Resource Efficiency:** The recycling process ensures a steady supply of high-quality, reusable materials, supporting local industries. For example, facilities in **South Brisbane and Crestmead** enable rapid remanufacturing of glass bottles, allowing glass returned in southern Queensland to be recycled into new bottles within a week. This short cycle enhances material productivity, reduces manufacturing lead times, and contributes to operational efficiency.
- **Investment in Local Infrastructure:** The Visy glass recycling facility under construction in **Yatala**—and due to open in 2025—will increase the recycled content in bottles from **30% to 70%**, improving material sustainability. This infrastructure expansion, supported by partnerships with major beverage companies like **Asahi, Bundaberg Brewed Drinks, Coca-Cola** and **Lion** ensures long-term investment in Queensland's circular economy and boosts overall productivity.

- **Economic Multiplier Effect:** In FY24, the scheme returned **\$181.6 million** to Queenslanders, with total refunds exceeding **\$900 million** since its inception.

### 1.3 Social Impact

- **Job Creation:** COEX's scheme supported **1,581 jobs** in FY24, a **68.2% year-on-year increase**. Many of these roles support individuals facing employment barriers, enhancing workforce participation and contributing to the state's overall productivity.
- **Support for Social Enterprises:** COEX collaborates with **13 social enterprises**, which earned **\$7.6 million in handling fees** in FY24. By fostering inclusive business models, COEX stimulates social and economic resilience, further enhancing the productivity of these enterprises.
- **Community Engagement and Donations:** In FY24, COEX facilitated **\$3.4 million** in donations to charities and community groups, bringing total contributions to **\$13.5 million**. These donations strengthen social capital and contribute to societal productivity by supporting essential community services.
- **First Nations Economic Participation:** COEX expanded its reach to **15 of Queensland's 17 First Nations Local Government Areas**, establishing co-designed refund points in six LGAs. This effort led to a **34.9% increase in container volumes** and created **90 jobs** for Aboriginal and Torres Strait Islander Queenslanders, promoting economic participation and improving productivity in historically underserved regions.

### 1.4 Productivity and Efficiency Benefits

- **Resource Efficiency:** COEX's recycling processes maximise material recovery and reduce reliance on virgin materials. This efficient use of resources directly contributes to national sustainability goals by lowering the environmental costs associated with virgin material production.
- **Economic Multiplier Effect:** By facilitating localised recycling and processing facilities, COEX has generated employment and stimulated regional economies. These efforts reduce dependence on imported materials, enhance Queensland's economic self-sufficiency, and contribute to productivity growth at both the local and national levels.
- **Reduced Waste Management Burden:** COEX's recovery scheme has significantly diverted waste from landfills, reducing waste management costs for municipalities and reducing kerbside recycling contamination. This allows public funds to be reallocated toward more productive investments, enhancing economic efficiency.

### 1.5 Factors of Success

- **Government Support and Legislative Framework:** The Queensland Government has played a critical role in COEX's success, partnering with the beverage industry to establish the enabling legislation and appointment of COEX, establishing clear recovery targets and legislating a container refund incentive (funded by beverage manufacturers under a product responsibility model) by way of a 10c refund for each container returned by individuals, business, charities and community groups. Additionally, government partnerships with Visy have supported the expansion of local reprocessing capacity.
- **Industry Partnerships:** COEX's collaborative approach with major beverage companies and Visy has strengthened the recycling value chain and promoted material circularity. Visy's commitment to increasing recycled content in glass bottles from **30% to 70%** underscores industry alignment with circular economy goals.
- **Localised Infrastructure:** COEX's operating model supports regional reprocessing facilities which minimises transport emissions and costs, while supporting local economic resilience. The ability to recycle and

remanufacture within Queensland ensures the state benefits from the full circularity of materials, enhancing productivity.

- **Public Participation and Engagement:** Community involvement, driven by accessible collection points and financial incentives, has been critical to COEX's rising recovery rates. This engagement underpins Queensland's progress towards achieving circular economy goals.

### 1.6 Potential for National Productivity Gains

The Queensland container refund scheme model and COEX's structure as a Producer Responsibility Organisation offers scalable models for improving productivity across Australia's circular economy. Expanding the model to other regions or container types could significantly increase resource recovery, reduce landfill waste and create cost savings nationwide.

**By integrating productivity and efficiency gains with social and environmental impacts, this case study underscores COEX's role as a leader in resource recovery and highlights its potential to drive circular economy outcomes at a national scale. COEX's approach aligns well with the Productivity Commission's focus on enhancing Australia's economic productivity through sustainable practices.**

## 2. Priority Opportunities to Progress the Circular Economy

### 2.1 Data and Reporting

Improving material-based economic processes and advancing the circular economy requires **comprehensive and accurate data** to identify gaps, track progress and inform targeted interventions. A clear understanding of the **inputs, throughputs and outputs** of material flows is essential for optimising resource efficiency and reducing waste. To achieve this, an economy-wide **circularity reporting framework** is crucial for tracking the lifecycle of materials, measuring progress and informing policy decisions.

An ideal reporting framework would include:

- **Total economy-wide volumes** of recyclable materials (e.g. high-density polyethylene (HDPE), polyethylene terephthalate (PET), aluminium, steel, glass) used as inputs in manufacturing.
- **Proportion of recycled versus virgin materials**, providing visibility into how effectively circular economy principles are being applied and identifying areas where virgin material use can be reduced.
- **Import and export volumes** of both virgin materials and secondary processed recycled materials, to assess Australia's material dependency and trade flows in the context of circularity.
- **Downcycling rates**, capturing the percentage of recyclable materials that are exiting the circular economy through lower value uses—such as road base—thereby limiting their potential for reuse in high-quality products.

Establishing a national framework for collecting and reporting these data points would allow for an accurate and comprehensive **Material Flow Analysis (MFA)** providing a quantitative and qualitative assessment of material flows at a macro level. This would highlight areas where the economy is still operating in a linear rather than circular fashion, enabling policymakers to develop strategies and policies that deliver greater circularity.

A **Commonwealth-led approach** is essential to ensure consistent data collection across states and territories, especially considering the importance of tracking cross-border material flows and international trade in recyclable commodities. By leveraging this data, the government can create targeted policies, incentives, and regulatory frameworks to improve material recovery, reduce downcycling and foster a more circular economy.

## 2.2 Industry Partnerships

Partnerships between industries are critical to progressing the circular economy, with **Extended Producer Responsibility (EPR)** being a standout mechanism. The collaboration between beverage manufacturers and container refund schemes illustrates the potential for industry-led circularity initiatives. However, to realise the full potential of circularity, this model must be expanded across other sectors and supply chains.

Opportunities for expanding **circularity partnerships** include:

- **Cross-sector Collaborations:** Beyond beverage manufacturers, there is scope to engage industries across the **waste, retail, logistics, and hospitality** sectors, which play vital roles in the material lifecycle. Integrating these sectors into circularity initiatives can reduce waste at multiple points in the supply chain and increase the recovery of valuable materials.
- **A Role for Retailers:** Retailers are in a prime position to support circular economy initiatives by offering convenient collection points for recyclable products, from packaging materials to small consumer electronics. As the point of sale for 70% of recyclable containers it could also be argued that retailers have a role to play in a broader EPR framework. (COEX, 2023)

## 2.3 Strategic Circularity Levers

To fully unlock circular economy opportunities, the Commonwealth should also focus on:

- **Incentivising Circular Product Design:** Introducing policies that promote **designing out waste**, extending product lifecycles, and making materials easier to reuse or recycle. Financial incentives for businesses adopting circular principles, such as reduced taxes on recycled content or grants for circular innovation, could accelerate the transition.
- **Promoting Circular Procurement:** The government should leverage its purchasing power to drive circularity by mandating the use of recycled materials and circular products in public sector procurement. This would create a stable demand for circular products, encourage industry investment in sustainable practices, and deliver long-term environmental and economic benefits.
- **Onshore Circularity:** The Commonwealth, and state and territory governments, should prioritise the sale of domestically recycled materials within Australia.
- **Education and Behaviour Change:** A nationally coordinated communications program could drive more appropriate use of bin infrastructure—in and out of home—to maximise capture and minimise contamination of recyclable materials. The Commonwealth could also drive national standards for collection methodologies and segregation of materials at source.

**By focusing on these priority areas—enhanced data reporting, expanding industry partnerships and strategic policy levers—the Commonwealth can accelerate progress towards a truly circular economy, delivering both economic productivity and environmental sustainability.**

## 3. Hurdles and Barriers to a Circular Economy

While the circular economy offers significant environmental and economic benefits, there remain structural and systemic barriers that prevent widespread adoption. COEX's experience in overcoming logistical and regulatory challenges, alongside broader industry-wide obstacles, offers valuable insights into addressing these barriers.

### 3.1 Logistical and Infrastructure Barriers: Container Refund Point Network Expansion

One of the critical enablers of consumer participation in container refund schemes is the **convenience of return points**. In COEX's 2024 Brand Track survey, 80% of respondents listed convenience of accessing refunds point as an important attribute for participation. Recent research conducted by South Australia's Environmental Protection Agency echoed this finding with respondents listing convenience as the number one driver of participation.

Australia's existing container refund schemes primarily rely on depots, reverse vending machines and bag drop points, all of which can be subject to laborious approvals processes in some jurisdictions (including Queensland), slowing the process of network expansion. Providing planning exemptions for low-impact infrastructure—like reverse vending machines—would allow for quicker network expansion driving greater accessibility for the consumer and businesses alike.

A **national partnership with the retail sector** could also provide a framework whereby more retailers host return infrastructure thereby increasing scheme access. With Tasmania set to launch its container refund scheme in 2025, there is an opportunity for the Commonwealth to investigate—in close collaboration with the retail sector—what the role of retail in Australia should be in the broader EPR framework.

### 3.2 Regulatory Constraints and the Need for Harmonisation

Australia's state and territory-based approach to container refund schemes has resulted in **regulatory fragmentation**, making it difficult to achieve consistency across jurisdictions. This patchwork of regulations has created hurdles for businesses operating across multiple states and has stifled efforts to develop uniform industry partnerships that could optimise circularity.

**National regulatory reform** is needed to harmonise policies, streamline compliance and reduce the administrative burden on businesses. A unified, national approach would enable more efficient collaboration across industries, particularly retail and logistics, and help scale up circular economy efforts. A **Commonwealth-led framework** could also improve the integration of recycling efforts with broader circular economy initiatives, ensuring that regulatory structures support, rather than inhibit, innovation and adoption of circular practices.

One clear example is the need for beverage manufacturers to register themselves and their products with each individual container refund scheme. This creates unnecessary duplication and complexity across a range of administrative processes. Work is underway through state and territory ministers to harmonise these functions, however Tasmania's scheme launch in 2025 highlights the immediacy of the opportunity.

### 3.3 Community Perception and Education Gaps

A significant barrier to circular economy adoption is the **lack of public trust** in recycling processes. A 2023 Cleanaway survey found that **43% of Australians do not trust** that recycling is properly conducted and **20% believe recycling ends up in landfill**. This mistrust leads to lower engagement, with **36% of respondents stating they would recycle more** if there was proof that their items were being recycled.

Additionally, the survey revealed widespread confusion around **recycling terminology** and **circular economy concepts**, with **78% of Australians unfamiliar with the term "circular economy"**. These knowledge gaps present a barrier to broader public engagement in circular practices. Although significant resources have been invested in education and behaviour change initiatives, the **fragmented approach** across states, territories and councils has limited the effectiveness of these campaigns.

To address this, there is a compelling case for a **national education campaign** that builds on existing state and industry-led initiatives but provides a consistent message across Australia. Such a campaign should focus on:

- Improving public understanding of **circular economy principles** and how they relate to everyday actions.
- Increasing transparency in the recycling process, offering **proof of recycling outcomes** to build trust.

- Standardising **recycling instructions** across jurisdictions to eliminate confusion and ensure clarity for consumers.

By fostering greater public awareness and trust, a national education initiative could significantly boost participation in recycling programs and circular economy practices, directly addressing one of the key non-commercial barriers to adoption.

### 3.4 Cost and Investment Challenges

Another barrier to circular economy adoption is the **initial cost of investment** in recycling infrastructure, reverse logistics and the development of circular products. For many businesses, particularly SMEs, the upfront costs of adopting circular practices can be prohibitive, especially when the **commercial return on investment (ROI)** is uncertain. Additionally, industries that depend on legacy supply chains may face high switching costs, further discouraging the transition to circularity.

To overcome this, governments must play an active role in **de-risking investments** and providing **regulatory certainty to business** in circular infrastructure. This can be achieved through:

- **Financial incentives** such as grants, low-interest loans or tax relief for businesses investing in circular technologies or processes.
- **Public-private partnerships (PPP)** to co-fund recycling infrastructure, particularly in regional areas, where market failures often impede private sector investment.
- Establishing **market signals** that reward circular practices, such as creating markets for recycled content or mandating recycled content in procurement contracts.

A **national approach** to addressing cost-related barriers would help level the playing field for businesses of all sizes and encourage broader participation in circular economy initiatives.

### 3.5 Direct government participation

COEX has established partnership agreements with a number of Queensland Government agencies, including an event-day agreement with Stadiums Queensland and a Standing Offer Arrangement with Queensland Health. However, direct participation in the scheme by government departments, agencies and corporations remains variable. The Queensland public sector employs more than 250,000 full-time equivalents demonstrating the enormous potential of greater direct participation by government itself, including through participation by government-owned sites like stadia.

One of the simplest actions governments at all levels could take to boost container recycling would be to **mandate participation across all its offices, depots, hospitals and other facilities**.

### 3.6 COEX's Experience in Overcoming Barriers

COEX has successfully navigated several barriers through strategic partnerships and regulatory engagement. For example, by working closely with the Queensland Government, COEX has:

- Addressed logistical challenges by continually expanding the **container refund point network** to increase accessibility, particularly in regional areas.
- Overcome regulatory constraints through consistent **stakeholder engagement**, ensuring alignment with evolving state and national regulations.
- Collaborated with local councils and not-for-profits to improve community engagement and **build trust** in recycling processes, which has led to a year-on-year increase in recovery rates.

However, broader systemic changes—such as **greater strategic harmonisation**—would further streamline COEX’s efforts and facilitate the scaling of circular economy practices across Australia.

**By addressing these structural and systemic barriers—through policy reform, public education and financial incentives—Australia can accelerate the adoption of circular economy initiatives, driving both environmental sustainability and economic productivity.**

## 4. Governments’ role in the circular economy

The Commonwealth plays a critical role in shaping the trajectory of Australia’s circular economy by providing leadership on **policy, regulatory, and financial measures** that incentivise circular practices. Strategic interventions in harmonising schemes, establishing material standards and investing in local infrastructure are essential to driving the circular economy transition. Furthermore, aligning Australia’s circular economy metrics with **international standards** and incorporating economic measures into CE outcomes can ensure the country remains competitive globally while realising significant environmental and economic benefits, as well as regulatory certainty.

### 4.1 Harmonisation of Circular Economy Schemes Across Jurisdictions

Australia’s state and territory-based container refund schemes, while effective, are currently fragmented, leading to inefficiencies and inconsistencies for businesses operating nationwide. **Harmonising these schemes** would create a streamlined regulatory environment, reducing the administrative burden and improving scheme efficiency.

The Commonwealth should take the lead in driving national harmonisation by:

- **Streamlining product registration, scheme contracting, reporting, invoicing and charging methodologies** to ease participation for businesses across all states and territories.
- Leading the creation of **national industry partnerships** to enhance supply chain circularity across retail, logistics and manufacturing sectors.
- Providing **strategic oversight** to guide the long-term direction of the schemes, ensuring alignment with broader sustainability and circularity objectives.

### 4.2 Establishing National Material Standards

A key barrier to achieving optimal circularity outcomes is the absence of **consistent material standards**. Different materials, such as various grades of HDPE or composite packaging, have varying levels of recyclability, which can complicate processing and recovery. To improve material circularity, the Commonwealth should establish a **national material standards framework** that prioritises high-quality, easily recyclable materials.

This framework should:

- Ensure that **material design** maximises recyclability and reduces contamination risks, aligning with international circular economy standards.
- Incentivise manufacturers to **avoid mixed-material products** that complicate recycling and increase the risk of downcycling.
- Promote **design for recyclability** to ensure materials can remain in circulation through multiple reuse and recycling loops, reducing waste and supporting resource efficiency.

By setting clear, consistent standards, the government can ensure that materials entering the circular economy are designed to stay in productive use longer, reducing reliance on virgin materials and enhancing material recovery rates.



### 4.3 Developing Local Processing Capacity and Supporting R&D

Australia's onshore recycling processing capacity is inconsistent across material types. For example, while local facilities exist for **glass recycling**, there are no domestic facilities for **aluminium can recycling**. These gaps increase reliance on international recycling markets, which raises costs and carbon footprints.

The Commonwealth should implement a **national strategy** to:

- **Expand domestic recycling infrastructure** for materials where local capacity is limited, such as liquid paperboard and certain plastics.
- Provide **incentives for international operators** to invest in onshore recycling facilities, creating local jobs and reducing export dependency.
- Promote **R&D in recycling technologies** to develop flexible, commercially viable processing solutions for low-volume or complex materials. This includes leveraging recycled materials in **non-traditional applications** such as construction, as demonstrated by the successful use of **recycled glass sand in concrete** (Tamanna et al., 2020).

A coordinated approach to building domestic recycling infrastructure will reduce the environmental impacts of exporting recyclable materials and foster local economic growth by creating sustainable jobs and industries.

### 4.4 Financial Levers and Incentives

To accelerate the adoption of circular economy practices, the government should introduce targeted **financial incentives** that promote the use of recycled materials and circular product design. Key financial measures include:

- **Taxes on virgin materials** to incentivise the use of recycled content, reducing the demand for non-renewable resources and supporting market demand for secondary materials.
- **Higher landfill levies** to incentivise greater circularity for recyclable materials.
- **Infrastructure grants and investment support** for the development of local recycling facilities, especially in regional areas where market failures limit private investment.
- Expansion of **EPR schemes** to include additional sectors beyond packaging, ensuring that producers are accountable for the end-of-life management of their products.

These reforms would drive innovation, encourage investment in circular economy infrastructure, and promote sustainable product design, ultimately reducing waste and enhancing material recovery across industries.

### 4.5 Setting Government Targets and Policies for Material Recovery

To further incentivise circular economy adoption, the Commonwealth should establish **national targets for material recovery, recycling rates and emissions reduction** through circularity. These targets should be embedded within a broader **national circular economy policy framework** and linked to tangible economic outcomes, including job creation and GDP growth from circular activities.

In line with this, the Commonwealth could:

- Mandate the use of **recycled content in public procurement** to create stable demand for recycled materials and stimulate investment in circular products.

### 4.6 Aligning Circular Economy Metrics with International Standards

Australia should adopt globally recognised circular economy metrics to ensure alignment with **international standards** and to benchmark national progress. The **ISO 59020:2024 "Circular economy — Measuring and assessing circularity performance"** offers a robust framework that could guide Australia in establishing consistent metrics for

tracking circular economy performance. These metrics should also be extended to capture **economic productivity** and **job creation**, ensuring that the economic benefits of circularity are fully quantified.

Additionally, key themes from Circular Australia's **Circular Economy Metrics** report provide a structured approach to measuring progress across five areas:

- **Material use**
- **Energy and greenhouse gas emissions**
- **Jobs and investment**
- **Water use**
- **Natural and regenerative environment**

By integrating these metrics with a focus on retaining **high-value recycled materials** within Australia and reducing the rate of downcycling, the government can ensure that materials remain in **productive use** longer, reducing the need for virgin inputs and enhancing supply chain resilience. Tracking **commercial and industrial sector participation** in circular economy initiatives is also crucial to driving broader business engagement and ensuring that circularity extends beyond consumer-facing schemes.

**The Commonwealth has a critical role in advancing Australia's circular economy by providing leadership on harmonisation, establishing material standards, expanding local recycling capacity and introducing financial incentives that promote circular practices. Aligning national circular economy metrics with international standards and capturing economic outcomes will enable Australia to benchmark its progress against global best practice while ensuring the circular economy delivers real-world benefits in terms of productivity, job creation and sustainability.**

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