

Commercial Painting Contractors
A.B.N No 84 073 027 291
Q.B.C.C. No 80638

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Australian competition & Consumer Commission

GPO Box 3131,

Canberra ACT 2601

Paintback Limited application for authorisation AA1000536

We would like to thank you for the invitation to provide a submission on Paintback Limited application AA1000536.

As a commercial painting contractor located in Townsville and servicing surrounding districts, we did submit an objection in 2016 to the proposed \$0.15 per litre levy being imposed to fund the Paintback scheme.

As stated in our original submission to the ACCC, \$0.15 per litre probably does not sound like much to pay for the privilege of disposing of unwanted or unused paint in an environmentally responsible manner, **However reality is.....**

We have paid **\$14,000.00** in Paintback levy, that equates to 408 litres per week. That is \$14,000.00 for a service **we cannot use and have never used.....**

One of the main reasons Nick Favot Painting cannot and has never used this service is because *Paintback accepts a maximum of 100 litres in volume per visit. REGARDLESS IF THE PAINT BUCKETS ARE FULL OR EMPTY*

Perhaps the ACCC needs to look at a **USER PAYS, OR BENEFICIARY PAYS, A PRICING APPROACH BASED ON THE IDEA THAT THE MOST EFFICIENT ALLOCATION OF RESOURCES OCCURS WHEN CONSUMERS PAY THE FULL COST OF THE GOODS THEY CONSUME.**

Nick Favot Painting could have used that \$14,000.00 to help offset the costs associated with supplying Enviro Washes, employing a fulltime workplace health & safety officer or the downtime associated with Toolbox talks every day, site inductions for every project, environmental risk assessments for every project or the costs associated with Social sustainability, Rehabilitation, Quality Management and code of business conduct just to name a few of the obligations that are adding to the cost of doing business in the commercial field.

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However instead of being rewarded for having an environmental policy in place that complies with all applicable laws, regulations and statutory obligations in relation to environmental issues, and having shown initiative in applying waste minimisation principles by using all surplus paint as block filler or first coats for all future projects and installing Envirowash stations on all projects. As per our environmental, protection and sustainability objectives.

We are in fact being penalised. Small to medium businesses are supposedly key contributors to the Australian economy and are vital for its growth Cash flow management and navigating the regulatory maze can be a challenge without adding another level of difficulty to the administration of an SME...

The paint back website states the following

To better achieve our stewardship objectives, we redesigned our supply chain structure, to put in place flexibility and deliver improved material stream outcomes for the future high-value end uses we are developing through our research activities today. It has increased competitive tension to foster innovation and improve financial sustainability in a thin market for liquid waste disposal services.

What does this paragraph actually mean, what have they achieved with the \$0.15 per litre

Yours faithfully,



Jeff Thorburn
Nick Favot Painting