



Ms Alison Playford
Director General
Transport Canberra and City Services Directorate
GPO Box 158
Canberra ACT 2601

Email: singleuseplastics@act.gov.au

10 January 2022

Dear Ms Playford

Re: Single-use plastics: tranche two (2)

Thank you for the opportunity to provide feedback on the ACT government's next phase of its single-use plastics ban. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body for all stakeholders in the \$14 billion essential waste and resource recovery (WARR) industry. We have more than 2,000 members across Australia, representing a broad range of business organisations, the three (3) tiers of government, universities, and NGOs.

The WARR industry drives jobs – employing up to 50,000 people – and investment in the Australian economy and WMRR's purpose is to lead the success of this sector, while ensuring the environment and community are protected through the safe and responsible management of waste and resources.

In the ACT, the WARR industry is a key contributor to the territory's economy and environment. In 2017-18, the total value of the ACT's WARR sector was estimated to be about \$207 million across MSW (\$40.9 million), C&I (\$77.8 million), and C&D (\$64.2 million); the approximate value of recovered materials for the period was \$23.9 million.¹

WMRR supports the use of regulation to eliminate single-use plastics as these items are essentially waste. Minimising their use will provide benefits in reducing pollution, increasing reuse, and ideally, improving the ability and quality of materials to be recovered.

The ACT government's efforts in managing single-use plastics are acknowledged, with the *Plastic Reduction Act 2021* enforced on 1 July 2021 to ban the sale, supply, and distribution of single-use plastic cutlery and plastic drink stirrers, as well as expanded polystyrene takeaway containers. WMRR commends the government for now considering what the next phase of the ban will look like.

WMRR's full submission can be found below but would make the following broad observations and recommendations:

- While WMRR supports the ACT government's intent to ban the "supply, sale, and distribution" of single-use plastic, we would encourage the government to go one step further and consider how it can restrict the design, manufacture and production of these materials as well.

¹ Inside Waste Industry report 2017-18: volumes and values



Nationally, WMRR has been advocating for greater emphasis on avoiding the creation of these materials at first instance, which requires a far stronger focus on product (including packaging) design, so as to eliminate the creation of hard-to-recycle and/or single-use materials. Avoiding the creation of these types of materials is preferable to managing them at end-of-life.

- Greater caution must be exercised in the promotion of alternatives to single-use plastics as often, they serve to reinforce the values of a throwaway society. Instead, emphasis should be on reuse and redesign and establishing systems that support these behaviours.
- Any initiative or program needs to facilitate a transition to a true circular economy, which means changing consumption habits must be a priority, alongside the use of locally made recycled products from Australian recycled materials.

Please do not hesitate to contact the undersigned if you would like to further discuss WMRR's submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'G Sloan', positioned below the 'Yours sincerely' text.

Gayle Sloan
Chief Executive Officer
Waste Management and Resource Recovery Association of Australia

SUBMISSION

Proposed material to be banned	WMRR's feedback
Single-use plastic straws	<p>Generally, WMRR supports the considerations of avenues to supply single-use plastic straws where medical exemptions are necessary, and we note that the government is seeking feedback on whether the SA model or Queensland model is preferred. WMRR supports the SA model where:</p> <ul style="list-style-type: none"> • Single-use plastic straws are available for sale or supply at businesses that have been prescribed an exemption, such as pharmacies or care facilities. • Any business such as cafés, hotels and restaurants have the option to stock and provide individual single-use plastic straws upon request to customers who need them. <p>However, the ACT is encouraged to coordinate with all other Australian jurisdictions to develop specific pathways and options for the disposal of these materials, including clear, standardised labelling that articulates how these products should be disposed of. Priority must be given to ensuring that volumes are minimal and that exempted single-use plastics are not discarded in a way that compromises the health of ecosystems.</p> <p>WMRR also does not support exemptions to manufacturers of “shelf-ready packaged products”, e.g., juice poppers, which could in effect provide an opportunity to avoid being responsible producers and thinking about the redesign which is key in building a circular economy.</p>
Single-use plastic fruit and vegetable “barrier bags”	<p>While the ideal solution is to completely eliminate all single-use packaging, until society reaches 100% avoidance and/or reuse, realistic solutions must be found, particularly as the use of barrier bags are part of a food business’ obligations in accordance with the Australia New Zealand Food Standards Code.</p> <p>WMRR supports the ban on single-use fruit and vegetable barrier bags and notes that the alternatives put forward are certified compostable and/or paper bags. The latter is supported as the preferred option due to the challenges posed by compostable packaging. While it is widely known that compostable packaging is commonly designed to break down, particularly in conditions found in industrial composting facilities, these facilities often cannot distinguish</p>

	<p>between compostable and non-compostable packaging, posing a risk of contamination of the material stream. Please note however, that some jurisdictions (e.g., NSW) do not allow compostable packaging within the FOGO system given the risk it places on quality of output materials. Secondly, compostable and organically degradable packaging has been known to take an extended period of time to break down in trials globally. Further, the ACT does not yet have the FOGO collection infrastructure in place to recover compostable packaging (with only a trial currently running in Belconnen, Bruce, Cook, and Macquarie), which begs the question of how these bags will be collected and where they will eventually end up.</p> <p>As noted above, caution must also be shown around alternatives, including compostable and/or biodegradable plastics because even though they may be hypothetically viable alternatives, they can also be counter-productive in behavioural change and environmental outcomes, and as highlighted in the paragraph above, problematic when there is an absence of a clear regulatory regime and/ or no infrastructure to support at scale.</p> <p>Should the government determine that certified compostable bags can be used as an alternative, the following must be considered and implemented ahead of the ban:</p> <ul style="list-style-type: none"> • These bags must meet Standards Australia’s AS4736-2006 and importantly, be accompanied with composting infrastructure for bags to be deposited (including in public spaces) and processed, as well as an appropriate regulatory regime (with testing) to ensure quality output material. • A three (3)-bin system must be implemented to ensure there is an effective collection mechanism for these bags at kerbside. • The roll-out and use of these bags must be complemented by an ongoing education program that should be tied to the government’s implementation of a three (3)-bin FOGO system. This is to inform and educate the community about the proper methods of disposal of these bags, ensuring that they do not end up as contaminants in the kerbside recycling stream, in landfill where they will
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	breakdown and produce greenhouse gases, or in our waterways.
Cotton buds with plastic sticks	As there are commercially viable and readily available recyclable alternatives, and this proposed product is in line with those that are already being phased-out globally, including the EU, WMRR supports this ban.
All oxo-degradable plastic products such as degradable plastic bags and degradable dog waste bags	<p>WMRR supports the ban on all oxo-degradable plastic products including degradable bags as it has been found (including by the UN) that biodegradable plastics do not readily break down in the natural environment. Further, these materials become microplastics when they break up, exacerbating the problem of plastics in the environment. The use of biodegradable products also does not decrease the volume of plastics that enter the ocean.</p> <p>As noted above, there are challenges associated with compostable packaging, which is touted by the ACT government as a potential alternative to oxo-biodegradable plastics.</p> <p>On non-degradable plastics as an alternative, WMRR is aware that there are collection options for soft plastics, e.g., through Redcycle in supermarkets, which as a source separated material collection system, is an initiative that is supported. However, despite potentially being a better alternative to degradable plastics, we do not believe this to be an appropriate alternative nor one that should be prioritised. Firstly, all lightweight shopping bags should be banned, irrespective of type, as they encourage single-use when the emphasis and focus should be on avoidance and/or opportunities to encourage re-use.</p> <p>Secondly, soft plastics, which are a significant proportion of single-use plastics, are not capable of collection and recycling at scale in Australia's kerbside recovery infrastructure, which means a significant volume ends up in landfill. These problematic plastics may often be easily replaced with alternatives, or better yet, removed. Expanding phase-outs of soft plastics will serve to encourage the take-up of alternatives that could be reused or recycled, leading to a potential diversion of volumes from landfill. Alternatively, the ACT should require producers who continue to utilise these materials to implement producer responsibility schemes to fund collection, recycling, and re-use costs.</p>