



Dr Ian Overton
CEO
Green Industries SA
GPO Box 1047
ADELAIDE SA 5001

Email: ian.overton@sa.gov.au
greenindustries@sa.gov.au

17 February 2022

Dear Mr Overton

Re: Turning the Tide: The Future of Single-Use Plastic in South Australia

Thank you for the opportunity to provide feedback on the range of single-use products that South Australia should consider for future stages of product phase-outs and the timing of these.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.5 billion waste and resource recovery (WARR) industry. Nationally, we have more than 2,000 members from over 500 entities that operate in a broad range of organisations, the three (3) tiers of government, universities, and NGOs.

WMRR's members are involved in the breadth and depth of waste management and resource recovery, engaging in significant activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residual and problematic waste.

An integrated WARR system drives jobs and economic growth and at present, the industry employs approximately 50,000 people across Australia. In South Australia, the waste, recycling, and remanufacturing industry is a significant contributor to the state, through:

- a turnover of about \$1 billion¹;
- Gross State Product (GSP) of \$1.08 billion²
- the employment of 4,800 full-time equivalent persons³; and
- a reduction of greenhouse gas emissions by 1.32 million tonnes of CO₂-e through recycling activities⁴.

WMRR acknowledges that South Australia is a frontrunner in restricting the use of single-use plastics, being the first Australian jurisdiction to ban and restrict plastic products such as straws, cutlery, and

¹ South Australia's Waste and Resource Recovery Infrastructure Plan, Green Industries SA 2018

² 2019-20 Recycling Activity Survey for South Australia, Green Industries SA, 2021

³ Ibid

⁴ Ibid

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037
(02) 8746 5000
INFO@WMRR.ASN.AU

WMRR.ASN.AU

beverage stirrers on 1 March 2021. We also welcome the second phase to ban expanded polystyrene cups, bowls, plates and clamshell containers, as well as oxo-biodegradable plastic products from 1 March 2022.

As reflected in our previous submission in March 2019, 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.

Broadly, we support the government's intent to expand the range of products to come under the single-use plastics ban, particularly the nine (9) product groups identified for attention at section 14(2) of the *Single-use and Other Plastics Products Act 2020*. However, we reiterate that the government:

- Must continue to consider how to place greater emphasis on avoiding the creation of these materials in the first instance.
- Needs to exercise caution in the promotion of alternatives, particularly when they serve to reinforce values of a throw-away society, e.g., compostable coffee cups and other compostable/degradable packaging. Emphasis must be on re-use and re-design.
- Must continue to engage with community and industry through a sustained communications and education program to re-educate and model single-use-free operations at all available opportunity. This is vital because despite SA's perception that it delivers strong education, it is difficult to demonstrate consistency and improved waste diversion performance and the community continues to face considerable confusion in the context of what is single-use, re-usable, compostable and bio-degradable.

WMRR has used the questions posed in the paper to guide our responses, which are addressed in our full submission below.

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

Yours sincerely



Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037
(02) 8746 5000
INFO@WMRR.ASN.AU

WMRR.ASN.AU

SUBMISSION

Question	WMRR's response
<p>Should South Australia consider banning or restricting this product group?</p> <p><i>Nine (9) product groups:</i></p> <ul style="list-style-type: none"> • Single-use plastic cups (including coffee cups) • Single-use plastic food containers • Single-use plastic bowls • Single-use plastic plates • Plastic lids of single-use coffee cups • Plastic balloon sticks • Plastic balloon ties • Plastic-stemmed cotton buds • Plastic bags <p><i>Other products being considered</i></p> <ul style="list-style-type: none"> • Fruit stickers • Plastic confetti • Plastic pizza savers • Plastic soy sauce fish • Plastic beverage plugs • Plastic bread tags • Other expanded polystyrene consumer food containers • Expanded polystyrene trays used for meat, fruit and other items for retail sale 	<p><i>Thicker style plastic bags</i></p> <p>As noted above, WMRR broadly supports the phase-out of the nine (9) product groups, as well as EPS trays and EPS consumer food and beverage containers, particularly as they largely align to national and international responses.</p> <p>However, we note that the government intends to ban thicker style plastic carry bags in stage four (4), and would highlight that while in theory, these types of bags appear to be a good candidate for a ban, this is not supported by WMRR because they are, on occasion, required for heavier and colder supermarket items (such as meat) and the more viable solution would be to transition to re-use models.</p> <p><i>Plastic produce bags</i></p> <p>While the ideal solution is to eliminate all single-use packaging, until society reaches 100% avoidance and/or reuse, WMRR notes that realistic solutions must be found, particularly as the use of barrier/produce bags are part of a food business' obligations in accordance with the Australia New Zealand Food Standards Code.</p> <p>Generally, however, we support the ban on single-use fruit and vegetable barrier bags and note that certified compostable bags have been touted as a viable alternative. WMRR highlights that there are challenges posed by compostable packaging that cannot be ignored. Although 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 between compostable and non-compostable packaging, posing a risk of contamination of the material stream. Notably, some jurisdictions (e.g., NSW) do not allow compostable packaging within the FOGO system given the risk it places on quality of output materials, including the</p>

	<p>presence of PFAS. Secondly, compostable and organically degradable packaging has been known to take an extended period of time to break down in trials globally. SA is encouraged to look to reuse models, such as reusable boomerang bags that are in place in supermarkets including the Harris Farm network in NSW, providing in situ viable alternatives to single-use plastics for the consumer.</p> <p><i>General feedback on other products</i></p> <p>WMRR does not support any SA-specific future ban on products that no other (or few) jurisdiction(s) in Australia or internationally has banned, including fruit stickers, plastic confetti, plastic pizza savers, plastic soy sauce fish, plastic beverage plugs, and plastic bread tags, even if there may currently be readily available alternatives.</p> <p>While WMRR agrees that these items should not be placed on shelves and should be designed out in the first instance, and while doing so would enable SA to remain a leader in this space, phasing these products out would also make SA an outlier. The SA government must consider whether the risk of national inconsistency (which comes with a range of challenges) is worth phasing out products that, from a volume perspective, are relatively insignificant, and could simply create confusion. Further, this will come with clear enforcement challenges, which requires resourcing; one has to query if this is the best use of government resources at this time when there are greater issues to address.</p> <p>We also note that some of the proposed alternatives may be technically recyclable but in reality, could cause issues at material recovery facilities if they are not appropriately collected, e.g., Tip Top's cardboard bread tag cannot be singularly disposed of in the yellow bin as they are too small to be picked up by MRFs; instead, people must be educated about bundling these</p>
--	---

	<p>together for the products to be processed and recycled.</p> <p>It is really important that SA works with all other Australian jurisdictions on the phase-out of these products, including aligning items and timeframes, to ensure national consistency so that both the community and businesses have certainty as to what products can and cannot be used, particularly for businesses as many are international/operate nationally. Australia has already seen firsthand from Container Refund/Deposit Schemes the confusion and frustration that arise when these schemes are not coordinated, and there is an opportunity to avoid this challenge by ensuring from the outset that single-use bans are nationally consistent.</p> <p>WMRR encourages the government to consider the following instead for a future phase-out as they either have been identified by Australian environment ministers for national phase-out by 2025, or are already being considered by other jurisdictions:</p> <ul style="list-style-type: none"> • Microbeads in personal health and beauty products • Plastic wrapping on magazines • Plastic dome lids • Loose EPS (e.g., polystyrene peanut style fill foam) • Corflute tree guards
Are there viable alternatives, and if so, what are they?	WMRR's comments on viable alternatives can be found throughout this submission.
What sort of exemptions, if any, may be needed?	WMRR only supports medical exemptions for these products where necessary and encourages the SA government 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.
What are the health, economic, logistical, and social issues that should inform any decisions?	<p>As noted above, caution must be shown around alternatives, including compostable and/or biodegradable plastics because even though these may be hypothetically viable alternatives, they can also be counter-productive in behavioural change and environmental outcomes, and it is absolutely essential that jurisdictions have a clear regulatory regime and/or infrastructure to support the collection and processing of these alternatives at scale.</p> <p>Should the government determine that certified compostable products can be used as an alternative, the following must be considered and implemented ahead of any ban:</p> <ul style="list-style-type: none"> • Products must meet Standards Australia's AS4736-2006 and importantly, be accompanied with composting infrastructure for these materials to be deposited [beyond the kerbside three (3)-bin system and 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 (including FOGO) is fully implemented across the state to ensure there is an effective collection mechanism for these products at kerbside and measures are undertaken to mitigate the risk of contamination of both green and yellow bins as alternative packaging is introduced. <p>It is also essential that there is an ongoing education program to inform and educate the community about the proper methods of disposal of these compostable bags and packaging, ensuring that they do not end up as contaminants in the kerbside recycling stream, in landfill where they will breakdown and produce greenhouse gases, or in our waterways.</p>

	<p>There are also obvious products that require action to drive litter and end-of-life plastic management, such as cigarette butts and fishing gear. For these materials, where a ban may not be viable in the near to medium term, WMRR supports the use of mandatory extended producer responsibility so that management of these products are appropriately resourced and funded by producers who supply these materials into our environment and economy.</p> <p>WMRR's position is that EPR returns moral and financial responsibility for potential hazards or harm to those who create it, and while these costs are able to be externalised, continuing to do so means we will not see the necessary change we require towards resource management or design. As such, it is the producers' responsibility to fund the collection, recycling and re-use of costs of these materials.</p>
What sort of timeframes should be considered?	<p>Broadly, WMRR supports the proposed stages and timeframes in the paper, where stage five (5) will occur no later than 1 March 2025. However, we urge the government to consider how it can align its phase-outs (including timeframes and items to ban) with all other Australian jurisdictions to ensure national consistency.</p>
How long would businesses, industry, and supply chains need to prepare?	<p>WMRR supports a 12-month transition period.</p>