



Dr Ian Overton
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Green Industries SA
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11 February 2024

Dear Dr Overton

Re: *Proposed 2024 Single-use and Other Plastic Products* amendment regulations

Thank you for the opportunity to provide feedback on the *Single-use and Other Plastic Products (Waste Avoidance) (Prohibited Plastic Products) Amendment Regulations 2024*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies.

WMRR acknowledges that South Australia (SA) has been the national frontrunner in restricting the use of single-use plastics (SUPs) and broadly, WMRR supports the government's intent to expand the range of products to come under the ban. However, WMRR continues to reiterate that a nationally consistent approach to regulations should also be a consideration of SA's pursuit to assist both business and the community comply with these restrictions and adopt behaviours that will make a real difference to both consumption and waste creation.

WMRR would encourage government to place greater emphasis on pre-emptively restricting the design, manufacture and production of problematic products that will also assist the WARR industry to reduce material to landfill, support re-use systems, and produce secondary products free of contaminants and harmful substances. Nationally, WMRR has been advocating for greater emphasis on avoiding the creation of these single use products that are essentially waste, at first instance. To this end, WMRR encourages SA to look at NSW's plastics plan which proposes design standards for bottle lids, cigarette butts and washing machines.

In WMRR's view overly prescriptive regulations focusing on specific items rather than product functions or classes of products, can undermine the intent of the bans and enable if not encourage product substitution. For example, the SA regulations specify a lid or stopper on soy containers which does not address sachets while NSW is proposing to 'phase out the supply of single-serve plastic condiment packages less than 50 ml' in recognition of substitute products.

WMRR also reiterates the need to exercise caution in the promotion of alternatives to SUPs, as for example, PFAS in packaging has demonstrated that alternatives can pose additional industry risks and

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human and environmental harms. Promoting alternatives also serves to continue to encourage unnecessary consumption and reinforce values of a throw-away society. WMRR continues to advocate that this policy has a real opportunity to tackle unnecessary consumption and can be a very powerful tool for real behaviours change to assist with avoidance and re-se system thinking. Emphasis must be on actions higher up the waste management hierarchy being avoidance, re-design and re-use.

WMRR applauds the approach to engagement by SA and we encourage the government to continue to do so with community and industry through a sustained communications and education program, to continue to educate and model waste avoidance and re-use options at all available opportunities.

Please contact the undersigned if you wish to further discuss WMRR's response.

Yours sincerely

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia