



Ms Michelle Andrews
Director General
Department of Water and Environmental
Regulation Government of Western Australia
Prime House, 8 Davidson
Terrace Joondalup, WA 6027

Email: plastic-action@dwer.wa.gov.au

18 November 2022

Dear Ms Andrews

Re: Western Australia's Plan for Plastics

Thank you for the opportunity to submit feedback on the Department of Water and Environmental Regulation's *Stage 2 of Western Australia's Plan for Plastics* paper.

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 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.

The state government has continued to show its commitment to reducing waste and increasing recycling as seen in a range of initiatives including the 2018 ban on lightweight plastic bags, the 1 July 2022 ban on all other carry bags, Stage 1 ban on single-use plastics and the proposed FOGO system for Perth and Peel by 2025. WMRR commends the government for progressing these initiatives and acknowledges its ongoing efforts in managing what remains a very challenging issue – the consumption and disposal of single-use plastics.

As reflected in our previous submission in July 2019 WMRR supports the use of regulation to eliminate single-use items, including plastics as these items are essentially waste. Minimising their use will provide benefits in reducing pollution, increasing reuse, and ideally, improve the ability and quality of materials to be recovered. 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 continue to serve to reinforce values of a throw-away society, e.g., compostable coffee cups and other compostable/degradable packaging, in effect simply replacing one single use waste with another waste. Emphasis must be on re-use and re-design.



- Must continue to engage with community and industry through a sustained communications and education program, as well as supporting this with investment, policy and infrastructure, to re-educate and model single-use-free operations at all available opportunities, including supporting and educating for re-use alternatives.

WMRR acknowledges the government's commitment to eliminate single-use plastics in our environment and believes that Stage 2 of *Western Australia's Plan for Plastics* paper continues to build the foundations a framework to tackle this challenge.

Key to DWER's success in reducing the use of single-use plastics is moving beyond regulations to support reuse initiatives. It is also important that DWER develops a robust process of tracking and enforcement to ensure delivery of outcomes.

Finally, but perhaps most importantly, any initiative, program and the like, needs to facilitate a transition to a true circular economy. This means that changing consumption and supply behaviours must be a priority, alongside the use of locally made recycled products.

WMRR has used the heading in the paper to guide our responses. Which are address in full below.

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


Yours sincerely

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

| General comments | |
|---|---|
| <p>Introduction and need for government action (pages 10-23)</p> <p>Lifecycle analysis (page 46)</p> <p>Cost-benefit analysis (pages 23-43)</p> | <p>WMRR advises caution in the promotion of alternatives as they seek to reinforce the values of a throwaway and linear society.</p> <p>WMRR support DWER’s lifecycle analysis and notes that reusable beverage cups and containers consistently outperform single use items. However, the plan focuses on banning single-use plastic (SUP) products with the assumption that this avoidance mechanism will promote re-useable alternatives without policy or financial support. It is noted that reuse schemes are only mentioned in the plan in passing, and there is no proposed strategy to replace this waste with reuse systems in WA. Without active support for these initiatives single-use non-plastic alternatives will likely fill the demand gap and require their own forms of recycling and waste management.</p> <p>WMRR notes the probable benefits from reduced contamination to the present recycling processes by the bans. However, the plan requires careful consideration of current FOGO capabilities, specifically in regard to Standards Australia’s AS4736-2006 compostable products and green imitation products.</p> |
| <p>Proposal 1 – Extended Polystyrene (EPS) packaging and degradable plastics (pages 50-53)</p> | <p>WMRR supports the EPS and EPS like plastics ban and degradable plastics ban and suggested timeframes.</p> <p>WMRR acknowledges the EPS ban aligns with the APCO action plan and Queensland roadmap on EPS, and the proposed degradable plastics ban aligns with current or forthcoming bans in other jurisdictions.</p> |
| <p>Proposal 2 - SUP food and beverage items (pages 54-66)</p> | <ol style="list-style-type: none"> 1. <i>coffee/hot beverage cups</i> 2. <i>cup and container lids</i> <p>In WMRR’s view WA should endeavour to prioritise and remove as many single-use items (plastic and non- plastic) as possible, particularly if there are readily available commercial alternatives. WMRR advises caution in the promotion of single use alternatives as they can seek to reinforce the values of a throwaway society. Emphasis should be on avoidance first, then re-use and redesign. As such WMRR offers qualified support of the cup, lid and container ban in conjunction with further action to promote reusable options.</p> <ol style="list-style-type: none"> 3. <i>produce/barrier bags</i> <p>The ideal solution is to eliminate single- use products. However, 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</p> |

| | |
|---|---|
| | <p>accordance with the Australia New Zealand Food Standards Code.</p> <p><i>4. EPS cups and food packaging</i></p> <p>There will be significant community communication and education challenges concerning the introduction of compostable food packaging materials (e.g., coffee cups and lids), beyond the use of current compostable bin liners for FOGO. WMRR notes with concern that there is no mention of PFAS in the plan. APCO’s 2021 action plan to phase out PFAS in fibre-based packaging raises concerns that until December 2023 (the target phase out date) there will likely be PFAS present in SUP compostable food and beverage items, and arguably well beyond this date.</p> <p>Given the likely presence of PFAS in these items they should be avoided given the risk they can pose to quality compost output. The plan and FOGO guidelines or timeframes do not appear to align on this. Which significantly increases the likelihood of ‘wish-cycling’ and FOGO contamination.</p> <p>WMRR notes the Environment Ministers Meeting on 21 October 2022, affirmed the federal government’s commitment to work with jurisdictions to phase out the use of harmful chemicals in food packaging. As such, this packaging should not be included in the WA scheme at this time.</p> |
| <p>Proposal 3 – small/microplastics (pages 67-70)</p> | <p><i>1. plastic cotton buds</i> <i>2. microbeads</i></p> <p>WMRR supports both bans and timeframe. Noting the federal voluntary ban on microbeads has been in place since 2016 and the ban on plastic cotton buds aligns with other state’s existing or planned bans.</p> |
| <p>Education programs (page 73)</p> | <p>These campaigns and strategies should not be developed and/or run-in isolation and government needs to balance and complement these with appropriate intervention and regulation in the product design and manufacturing stage of the supply chain.</p> <p>Additionally, despite its cost, as highlighted by DWER in the paper, these are necessary initiatives. The focus of these campaigns should be on changing consumption behaviours (encouraging avoidance and reuse), as well as developing recycling habits that increase source separation and reduce the risk of contamination. Importantly, education and support are required to assist community in preferencing recycled content in packaging.</p> |

| | |
|--|--|
| <p>Australian regulatory landscape (page 20)</p> | <p>WMRR encourages the WA government to work with other governments (in particular SA, Queensland and Victoria) to facilitate a consistent approach towards single-use plastics, including the items that should be of focus. Noting the Federal government’s commitment from the Environment Ministers Meeting on 21 October 2022, to develop nationally harmonised definitions to support the phase out of problematic single use plastic.</p> |
| <p>Product design (pages 18-19)</p> | <p>It is important that WA works with all 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><i>1. Sustainable product design</i></p> <p>DWER recognises that APCO’s 2025 National Packaging Targets which rely on voluntary targets does not deliver sufficient interventions in policy, production, education, and engagement to produce the systemic change needed to meet reduction targets. DWER has turned their focus to banning the most problematic of single use plastics. However as expressed throughout the submission this does not resolve the issue of single use items and consumption patterns.</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 not covered in the plan. For these materials, where a ban may not be viable in the near to medium term, WMRR suggests 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 encourages DWER to consider returning the moral and financial responsibility for potential hazards or harm to those who create it. While these costs are externalised, we will not see the necessary resource management or design changes to rectify this. As such, it is the producers’ responsibility to fund the collection, recycling and re-use of these materials.</p> |