

[REDACTED]

From: Adam Johnson [REDACTED]
Sent: Monday, 15 April 2019 7:50 AM
To: Plastic Action
Subject: Plastics reprocessing centre needed

Follow Up Flag: Follow up
Flag Status: Completed

To Whom it May Concern,

WA needs a plastics reprocessing facility.

Regards,

Adam Johnson

[REDACTED]



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

AFGC SUBMISSION

LET'S NOT DRAW THE SHORT STRAW

Reduce single-use plastics | Issues paper | July 2019

Sustaining Australia

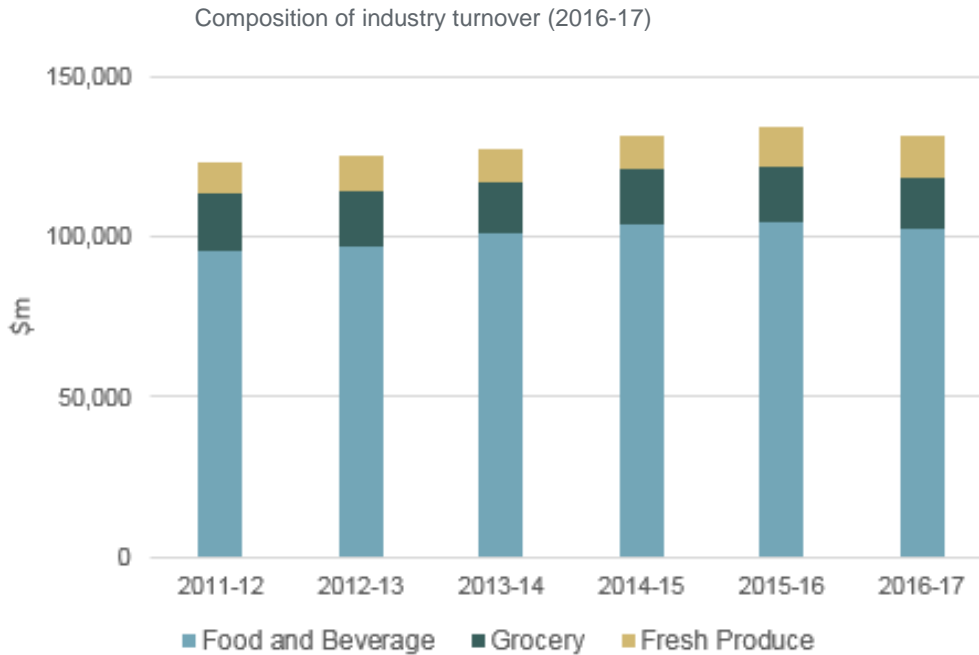
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AFGC OVERVIEW

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

There are over 180 member companies, subsidiaries and associates who together comprise 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.



With an annual turnover in the 2016-17 financial year of \$131.3 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

The diverse and sustainable industry is made up of over 36,086 businesses and accounts for over \$72.5 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry made \$2.9 billion in capital investment in 2016-17 on research and development.

Food, beverage and grocery manufacturing together forms Australia's largest manufacturing sector, representing 36 per cent of total manufacturing turnover in Australia.

The food and grocery manufacturing sector employs more than 324,450 Australians, representing almost 40 per cent of total manufacturing employment in Australia.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost 42 per cent of the total persons employed being in rural and regional Australia.

It is essential to the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

EXECUTIVE SUMMARY

The Australian Food and Grocery Industry (AFGC) acknowledge the impact plastic can have on the environment when disposed of in an irresponsible manner. We support the Western Australian Department of Water and Environmental Regulation (DWER) initiative to investigate and address the issues of low plastic recycling rates and the impacts of terrestrial and marine litter. We believe these are distinct issues with individual causes and effects and therefore need to be assessed and addressed independently to obtain the best outcome for the community and the environment.

The food and grocery industry believes any proposed action to reduce litter and increase recycling rates needs to be assessed through a criteria based on a community benefits test. Together, industry and government are responsible to the community to provide services and products that result in a net community benefit. When assessing the impacts of single use plastics we also need to be conscious of the community benefits of packaging; reduced food waste, providing food safety, food quality, product stability and extending product expiry dates. Therefore, when addressing the issues raised in this discussion paper, we need to ensure any proposed actions do not result in a reduced net community benefit, such as increasing food waste or health risks.

Whilst we support DWER for initiating the discussion paper to gain community and industry feedback, we recommend DWER to use the information gathered to inform the development of the National Waste Policy. As the Australian Packaging Covenant Organisation (APCO) continues to collaborate with all stakeholders on these issues, and has developed 22 sustainable packaging related project plans, we believe the greatest national community benefit will be achieved if all stakeholders collaborate and support the APCO led process. This will enable the community, industry and government to develop effective fact based national action plans that can be tailored and implemented at a state level with the support of industry.

We thank the DWER for the opportunity to provide feedback on behalf of our member companies.

QUESTIONS ABOUT YOUR VIEWS ON SINGLE-USE PLASTICS

1. Do you support reducing the amount of single-use plastics we consume?

The AFGC supports the aims of the National Packaging Targets and is collaborating with APCO, Commonwealth and State Governments, and the packaging and waste industries to reduce the use and impact of unnecessary and problematic single-use plastics when irresponsibly disposed of, or littered, in terrestrial and marine environments.

Many of our members have already commenced phasing out problematic and unnecessary single use plastics in their products and operations. Examples include major Quick Service Restaurant chains phasing out polystyrene in 1990's and more recently, [McDonalds](#), [Nestle](#) and [Coca Cola](#) have committed to phasing out plastic straws in support of the National Packaging Targets. Globally, Nestle have published a list of [problematic plastics](#) they have commenced phasing out of product packaging. In recent weeks, Johnson and Johnson has ceased manufacturing plastic cotton buds and moved to a more sustainable design.

Additionally, the AFGC, in collaboration with APCO, is developing a project where a defined list of single-use plastics will be phased out of all fast food and take-away outlets in a regional town in order to measure the impacts on litter reduction and work through any in store operational issues. We are happy to share details of this trial with DWER as the project develops over the coming months.

However, the AFGC recommends DWER take into account the following considerations to guard against unintended consequences that have the potential to result in negative environmental and community outcomes:

- a) Clarity of policy aims,
- b) Ensure environmentally superior substitutes are available,
- c) Do not jeopardise food safety or product hygiene, and
- d) Do not increase food waste

Consideration 1: Clarity of policy aims

To achieve optimal environmental outcomes, the AFGC believes it is critical to first establish clear policy aims. In relation to single-use plastics, policy aims could be to, 1). reduce litter, and/or 2). increase recycling rates. It is critical that the policy aims are clearly defined and confirmed prior to developing policies as the actions to address litter and recycling rates vary dramatically.

Reduce Terrestrial and Marine Litter

If the aim is to reduce litter, the following initiatives would prove effective:

1. Container Deposit Scheme (CDS): As evidenced in SA, NSW and Qld, the introduction of a CDS has a dramatic impact on reducing the volume of beverage containers littered and therefore entering marine environments.
2. Public place bins: Increased public place bins, strategically located in high litter areas will assist in preventing litter entering the environment and should be considered as a first line of defence, especially in highly used public areas adjacent to waterways.
3. Education: The AFGC believes it is necessary to move from binary messaging (good and bad actions) to aspirational messaging to drive community behaviour change. As understanding consumer behaviour is a core skillset of brand marketing, the food and grocery sector understands that to change consumer or community behaviour, you must first create perceived value of an item. Simply informing householders of 'correct' and 'incorrect' actions does not build the perceived value to reduce littering and increase recycling. The AFGC is keen to collaborate with local governments, DWER and the waste sector and share marketing expertise.

Increase Recycling

If the aim is to increase recycling rates, then policy should focus on materials with low recycling rates. As detailed below in diagram 1.1, the low Australian recycling rates of plastics and glass at 12.3% and 52.6% respectively highlight the need for local infrastructure development and market stimulation.

Diagram 1.1: Australian Recycling and Local Utilisation Rates

Material	Recycling Rate		
	MSW	Packaging	National Packaging Target
Plastic	12.3%	32.0%	70.0%
Glass	52.6%	50.0%	Not Specified

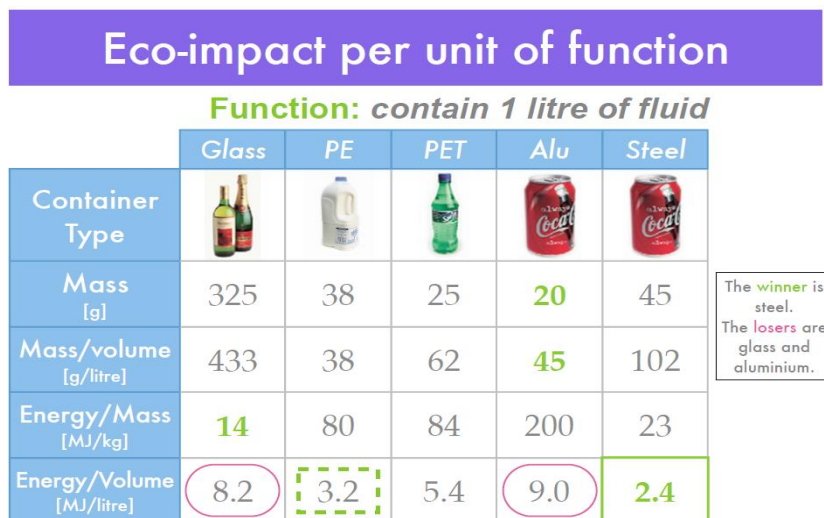
Source: National Waste Report 2017/18 & APCO Material Flow Analysis February 2019

1. Plastic: Due to the recent closure of Asian plastics processing markets, local infrastructure is required to process and manufacture rPET and rHDPE and hence increase the plastic recycling rate. Additionally, to increase the recycling rate of plastics #3-7, emerging technologies such as chemical processing and/or the usage of plastics in roads could be considered, both requiring further research and development from industry and government. See Appendix 1 for further details.
2. Glass: To increase the recycling rate of glass, several options need consideration. Firstly, increased use of post-consumer glass in civil construction and roads would reduce current glass stockpiling. Secondly, source separation of glass in kerbside collections would increase the quality of post-consumer glass allowing greater percentages of recycled content in local glass bottle production. See Appendix 1 for further details.

Consideration 2: Availability of environmentally superior substitutes

It is imperative that substitutes for unnecessary and problematic single-use plastic items provide an overall environmental benefit. Therefore, the AFGC recommends that a lifecycle assessment is undertaken on product substitutes to ensure they are environmentally beneficial. For example, as evidenced by diagram 1.2 below, the energy used to source manufacture packaging materials varies widely and should be taken into account to mitigate against unintended negative environmental outcome.

Diagram 1.2: University of Cambridge - Manufacturing Energy Efficiency by Material Type



Recycling changes the picture a little – but not simple

Diagram 1.2 highlights that replacing PET with glass may in fact increase energy consumption from 5.4 to 8.2 MJ/Litre during product manufacture. Additionally, due to the additional weight of glass, further energy would be consumed during transportation. Therefore, in the case of soft drink bottles, it is environmentally beneficial for them to remain in PET, be collected in the container deposit scheme and recycled into rPET to stimulate a circular economy as in the example of Coca Cola's recent [announcement](#) to utilise 100% rPET in all bottles less than 601ml by the end of 2019.

Consideration 3: Protecting food safety and product hygiene

The food and grocery industry is presented with a balancing act to ensure that the primary benefits of packaging; to ensure product stability, provide food safety and reduce food waste, are not outweighed by the effects of irresponsible disposal and littering. As stated on page 14 of the recent South Australian discussion paper, *"Plastics play an important role in our economy and daily lives. Light and innovative materials in cars or planes save fuel and cut CO2 emissions and when used in packaging, plastics help ensure food safety and reduce food waste."*

The superior air and moisture barrier properties provided by plastic packaging increase food quality and safety and provide effective hygiene barriers for medical and therapeutic products used at home or in the medical sector. Overall, this has led to improved community health outcomes that need to be considered when selecting product/packaging substitutes to reduce the impact of irresponsible disposal. The AFGC recommends these community health benefits be taken into account when drafting definitions of problematic and unnecessary single-use plastics (see diagram 1.3 below).

Consideration 4: Reducing food waste

The AFGC is a supportive member of the Commonwealth Department of Environment and Energy's Food Waste Steering Committee and the Fight Food Waste CRC. Similarly, brand owners continue to support the reduction of food waste through donations to food charity, such as Foodbank, and through reducing waste during the manufacturing process.

Packaging also plays a vital role in reducing food waste through providing:

- ✓ an air and moisture barrier to extend shelf life and reduce spoilage,
- ✓ resealable packaging to extend shelf life and reduce spoilage,
- ✓ portion control so that packaging sizes align with average usage/serving sizes,
- ✓ packaging that easily dispenses all food product to avoid wastage (eg: squeezable pouches), and
- ✓ reducing damage and waste in transport along the total supply chain from paddock to plate.

Diagrams 1.3 and 1.4 below, highlight that food waste does not only include the loss of the food itself, but the water and energy consumed to grow the food, transport the food, process the food, create the packaging, package the food and store and/or refrigerate the food from the farm to the fork.

Diagram 1.3 – Food Chain Energy Use

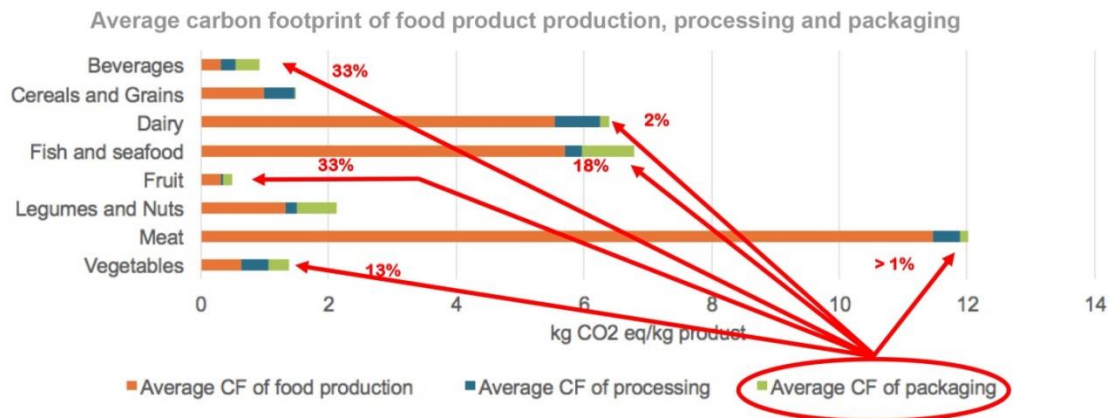


Diagram 1.3 highlights that on average, packaging only accounts for 10% of the energy consumed in the total food supply chain. Simply put, if inferior packaging is used that increases food waste, the energy cost could be 9 times greater than the energy used to create the packaging.

Diagram 1.5 below highlights that the carbon footprint of products varies considerably by item, with meat, seafood and dairy products recording the highest energy consumption during production. Hence changing to inferior packaging that increased food waste on these items would result in considerable detrimental environmental outcomes.

Diagram 1.5 – Carbon Footprint by Product Type

Life Cycle Assessment (LCA) - Carbon Footprint Packaging's impact Kg CO₂ eq/Kg product



“The whole value chain has a responsibility to explain that sustainability is not synonymous with recycling, recyclability, recycled content, biodegradability and other popular buzz words, but that it is the overall resource efficiency of the supply chain that should be the main priority.” (Russell, 2014)

<https://www.oregon.gov/deq/FilterDocs/PEF-Packaging-ExecutiveSummary.pdf>

Due to the above considerations, the AFGC believes it is critical to incorporate them into the definitions of unnecessary and problematic single-use plastics to avoid unintended negative environmental and community outcomes. We believe consideration of the draft definitions below would reduce the risk of unintended consequences and negative environmental and community outcomes.

Diagram 1.5 – Draft definitions

“Single use”

To remove any ambiguity defining ‘single use’, the AFGC recommends the following criteria be considered:

- The item or items contained in the packaging is only used, or sized to be consumed, in one occasion, or
- Only a single item is contained in the packaging, or
- The item is not resealable to allow usage or consumption on multiple occasions, or
- Plastic items with greater 30% recycled content (in line with the national packaging target) are excluded as they contribute to the creation of a circular economy and their continued use is required to stimulate demand.

“Problematic”

Includes products and items that:

- are currently difficult to recycle with no emerging processing innovation to enable increased recycling in the near future, and
- are ranked high in litter surveys.

For example, plastic film should be excluded until emerging chemical processing technology has been assessed, as failure to do so may stifle innovation and therefore lower recycling rates in the long-term (ie: the criteria needs to be future looking, not tied to the past China based recycling system and promote innovation to develop a circular economy)

“Unnecessary”

- Product packaging that fails to meet the community benefits test; where, on balance, the benefits provided by the packaging do not exceed the issues caused by the packaging, or
- Exempt plastic packaging where environmentally superior substitutes do not exist or the environmental cost from food waste or the risk to health exceeds the environmental cost of litter
- Consider excluding hazardous goods and therapeutic and medicinal products (those managed by the TGA) due to mitigate against increasing health and safety risks.

For example, products would not be defined as unnecessary where the benefits provided to the community by the packaging (reducing food waste and providing food safety for consumers) exceed the impact of recycling or litter issues.

Alternatively, rather than establishing broad legal definitions of unnecessary and problematic single-use plastics, which may prove ambiguous in the long-term, a simple list of nationally consistent items could be drafted and agreed by all jurisdictions which would provide industry with certainty, clarity and confidence to invest. As our members operate within national and often global supply chains, alignment across the jurisdictions will provide brand owners with the scale necessary to drive optimal environmental outcomes.

The AFGC recommends establishing a defined national list of problematic and unnecessary single-use plastics in consultation with APCO, the Therapeutic Goods Administration (TGA), Food Standards Australia New Zealand (FSANZ) and the Fight Food Waste Co-operative Research Centre (FFWCRC) to ensure detrimental unintended health or food waste consequences do not occur.

The AFGC and brand owners are actively engaged in [APCO Project 3. White Paper on Problematic and Unnecessary Packaging](#), [Project 6. Food Service Packaging Guidelines](#), and [Project 14. Models for Phase Out of Single Use Plastics](#) and urge DWER to consider the recommendations of these projects as part of the consultation process.

2. How concerned are you about each of the following issues with single-use plastics:

The AFGC and brand owners are very concerned with the negative environmental impact of plastic when it is disposed of in an irresponsible manner. As an industry, we are committed to collaborating with all packaging stakeholders, from packaging suppliers, retailers, Government, collectors to MRF's and secondary processors, to reduce the impacts of littering and simultaneously increase the current low recovery and recycling rates.

In response to the questions raised in the discussion paper, each has been answered and expanded upon in diagram 2.1 below.

Diagram 2.1: Issues with single-use plastics

Issue/s	Plastics end up polluting our waterways and oceans, and Plastic litter is harming our wildlife
Level of Concern	Very concerned
Comment	Brand owners are deeply concerned with packaging being irresponsibly disposed of and polluting terrestrial and marine environments and as a result have commenced phasing out problematic and unnecessary plastic packaging where environmentally superior substitutes are available.
Issue	Many plastics cannot be recycled
Level of Concern	Very concerned
Comment	<p>As mentioned in question 1, brand owners have commenced phasing out single-use plastics that are currently difficult to recycle and have committed to increasing the recycled content of other packaging.</p> <p>It is also worth noting that the APCO material flow analysis highlighted the recycling rate of plastic packaging is almost three times higher than the national MSW plastic recycling rate at 32.0% and 12.3% respectively. Despite this, the AFGC and brand owners are collaborating with APCO and all supply chain stakeholders to increase this to 70% to achieve the National Packaging Targets.</p> <p>The AFGC believes there is an urgent need for local infrastructure development to supply fit for purpose rPET and rHDPE due to the current lack of availability.</p> <p>Furthermore, the AFGC understands increased recycling of plastics #3-7 may be achievable through research and development of chemical processing that would return end of life plastics to oil and increasing the use of plastics in road making and railway sleepers. For further detail, please see Appendix 1.</p>
Issue/s	Plastic contaminates composting and recycling facilities
Level of Concern	Somewhat concerned
Comment	<p>The AFGC and brand owners are concerned about plastics contaminating recycling and organics processing facilities.</p> <p>The AFGC understands that common MRF contamination results from hard plastics and plastic bags/film being placed in the incorrect bin. Brand owners and APCO are driving change in this area with increased uptake of the Australian Recycling Logo (ARL) and the RedCycle logo which directs consumers to dispose of plastic film in store.</p> <p>In relation to organic facility contamination, the AFGC is collaborating with APCO on the development of a compostable packaging label which aims to reduce community confusion and the incidence of contamination.</p>

Issue/s	Plastics persist in landfill, and Plastics use oil resources and contribute to global warming
Level of Concern	Very concerned
Comment	<p>The AFGC and brand owners are concerned about the loss of natural resources that occurs when plastics are disposed of to landfill versus being recycled. Although the impact of landfilling plastics is less visible than the impact of plastics in the marine environments, it still presents a loss of resource that ultimately increases preventable carbon emissions.</p> <p>The solution is to increase recycling rates and recycled content usage to stimulate a circular economy.</p>
Issue/s	Plastics are harmful to human health
Level of Concern	Very concerned
Comment	<p>The AFGC agrees that plastic entering the environment has the potential to enter the food chain with detrimental effects on human health.</p> <p>As detailed above in our response to question 1, caution needs to be taken to ensure reducing some single use plastics does not result in unintended adverse health and safety outcomes for the community in the form of increased food waste, lower product quality and food safety.</p>

3. For each of the choices below, please tell us how consistently you choose alternatives to single-use plastics:

As these questions are directed at individual shopper behaviour and the AFGC represents the food and grocery sector as a whole, these questions have not been answered. Details of industry actions are contained in the questions 1 and 4.

4. Please prioritise your top ten single-use plastics that should be the focus of additional action to reduce their negative impacts, with 1 being most important.
5. For each of your priority single-use plastics, please indicate your top two options to reduce impacts.

Both questions 4 and 5 have been answered in the diagram 4.1 below:

Diagram 4.1: Options to reduce single-use plastics

<i>Items</i>	<i>Priority</i>	<i>Options to reduce single-use plastic waste</i>	<i>Rationale / Comment</i>
Plastic Bags			
Lightweight plastic bags	1	State-wide ban on the sale or supply	Maintain focus on embedding the light weight plastic bag ban that was effective January 2019.
Thicker plastic bags		Labelling requirements & education campaign	As the light weight ban is currently being embedded in the retail sector the AFGC believes that greater long-term community acceptance and buy-in will be achieved if thicker bags remain available in the medium term, combined with (1) education of shoppers to purchase & re-use re-usable shopping bags and (2) the addition of labelling instructions on heavy weight plastic bags highlighting the REDcycle program via use of the Australian Recycling Logo (ARL).
Prepacked fruit and vegetable		Labelling requirements & education campaign	This area needs to be assessed with item by item decisions based on lifecycle assessments (LCA's) that include the impact of food waste and account for food safety risks. As many perishable products are wrapped in plastic in order to extend shelf life and/or provide food safety, plastic should only be removed if there is a clear net community & environmental benefit of doing so. Examples of unintended consequences may include cross contamination of meat and/or seafood products, and the reduced shelf life and increased food waste of fresh food items. The AFGC believes a national food waste education campaign would be beneficial to reduce community confusion and to increase their understanding of the importance of packaging in relation to providing food safety and reducing food waste. Furthermore, to increase the recycling rates of barrier bags, use of the ARL will educate consumers to recycle barrier bags rather than disposal to landfill.
Barrier / produce bags			

<i>Items</i>	<i>Priority</i>	<i>Options to reduce single-use plastic waste</i>	<i>Rationale / Comment</i>
Takeaway food containers & implements			
Drinking straws	5	Voluntary agreements with business and industry	As all these items have environmentally superior substitutes that are readily available, we believe a voluntary process to replace these items is preferred. The key reason for preferencing this option over an outright ban is (1) the need to keep plastic straws with flexible necks for the disabled and aged as a ban could be interpreted as discriminatory, and (2) sourcing substitutes may take several years as suppliers transition from plastic and build manufacturing capacity of paper based alternatives. Additionally, straws attached to CDS drinking containers could be exempted as they do not pose a real environmental risk and are already contained within a litter scheme.
Takeaway food containers	6		
Cutlery, plates, stirrers	7		
Takeaway coffee cups / lids		Sustainable product design	The solution for increasing recycling rates of coffee cups is not simple due to the nature of the item being purchased in one location and consumed and disposed of in another location. Furthermore, current disposable coffee cups cannot be recycled due to the plastic lining that is necessary to contain fluids and to provide consumer safety from burns. However, as several new packaging technologies and collection systems are now emerging (e.g. recycle me & simply cups) as well as a Keep Cup exchange program, the AFGC recommend these options be trialled to assess the environmental, economic benefits and the community acceptance of each scheme.
Plastic beverage containers		CDS - Extended producer responsibility scheme	The AFGC supports the 2020 introduction of the WA CDS, as this combined with the increased recycled content of many containers (See Coca Cola press release), will provide a clean stream of plastic to stimulate a circular economy.
Polystyrene			
Polystyrene - Single use packaging	4	State-wide ban	Greater segmentation of polystyrene is required prior to recommending actions. For instance, banning <u>single use</u> polystyrene takeaway food containers and packaging peanuts would be beneficial as environmentally superior substitutes are readily available.
Polystyrene - reusable or long term use		Education campaigns / behaviour change strategies	Multiple use or long-term use polystyrene used (and reused) in packaging to transport perishable and/or refrigerated food reduces food waste, and waffle pods used in construction have well documented benefits. Education of recycling options may be beneficial.

<i>Items</i>	<i>Priority</i>	<i>Options to reduce single-use plastic waste</i>	<i>Rationale / Comment</i>
Retail Products			
Microbeads	8	State-wide ban	Due to the success of the voluntary removal of micro beads from 94% of cosmetic and personal care products implementing a ban that includes all products would be beneficial to the environment.
Cotton buds with plastic shafts		Voluntary agreements with business and industry	Due to the success of the voluntary micro bead removal program and as cotton buds do not appear to be a litter issue within Australia, the AFGC recommends establishing a voluntary agreement to replace cotton buds with plastic shafts with cotton buds constructed with alternate environmentally superior materials.
Wet or baby wipes		Labelling requirements & education	As wipes do not pose a litter issue and are unable to be recycled due to contamination, it is important to ensure all products are labelled highlighting the disposal method relevant to each item. Due to the use of baby wipes, labelling must recommend disposal to landfill. Flushable wipes should only indicate toilet disposal if appropriately certified.
Cigarette butts / filters	2	Sustainable product design and increased public place collection points	As cigarette butts are the most littered item, can cause fires and have been subject to past education campaigns the following options may reduce litter rates and environmental impacts: (1) increased public place cigarette butt bins, and (2) product redesign to remove all plastic materials.
Plastic packaging	10	Sustainable product design and Voluntary agreements with business and industry	As no definition for plastic packaging is provided, the AFGC recommends DWER collaborate with APCO Project 3 and Project 14 that focus on problematic and unnecessary packaging and phasing out single use plastics respectively. The food and grocery industry is supportive of the national packaging targets, is engaged with the APCO projects, and would recommend all state Governments also collaborate to provide a consistent national focus and prioritisation of problematic and unnecessary items for industry to redesign. As brand owners have global supply chains, a national approach will provide the scale necessary to optimise environmental outcomes.
Fishing gear	9	Increased public place general waste bins supported with targeted educational material	Due to the prevalence of fishing gear litter in the marine environment (12%) increased public place bins supported by a targeted education campaign is recommended.

<i>Items</i>	<i>Priority</i>	<i>Options to reduce single-use plastic waste</i>	<i>Rationale / Comment</i>
Rubber & Plastic Balloons			
Balloons		Education campaigns / behaviour change strategies	Phase 1: As banning balloons may be interpreted by the community as the Government policing the 'fun of children', an education campaign directed at adults and children relating to the impacts of balloons in the marine environment and the preference for only using balloons indoors could be considered by Government.
Balloon releases	3	State-wide ban	Phase 2: After the above education campaign has been in place for 3-5 years the Government may consider banning outdoor helium balloon releases with general support from the community.

SUMMARY OF RECOMMENDATIONS

The AFGC appreciates the opportunity to provide input to the West Australian *Let's not draw the short straw - Single-use plastics* discussion paper and supports the aims of reducing terrestrial and marine litter and increasing the recycling rate of plastic. We believe these are distinct issues and need to be assessed and addressed independently to obtain the best outcome for the community and the environment.

The food and grocery industry believes any proposed action to reduce the impacts of unnecessary and problematic single-use plastics requires an evidence based assessment process to deliver overall environmental and community benefits and ensure perverse outcomes are avoided. Considerations to include are:

- Ensuring clarity of policy aims,
- Ensuring environmentally superior substitutes are available,
- Ensuring food safety or product hygiene are not compromised, and
- Ensuring food waste does not increase

The AFGC also recommends that a nationally consistent list of unnecessary and problematic single-use plastic items is developed to provide industry with certainty, clarity and confidence to invest in selecting environmentally superior substitutes.

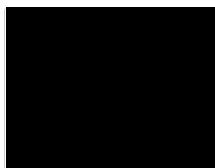
The AFGC recommends DWER continues to collaborate with APCO as they lead the whole-of-supply-chain project to develop the National Waste Policy Implementation Action Plans that include plans to phase out problematic and unnecessary single use plastics by 2025.

The AFGC thanks DWER for the opportunity to contribute to the consultation process and is keen to collaborate with all industry and government stakeholders to reduce the impacts of litter, increase recycling rates and develop a circular economy.

Should you require any additional information, please do not hesitate to contact me on [REDACTED] or

[REDACTED]

Regards



Barry Cosier
Director, Sustainability



APPENDIX 1:

The following appendices detail actions the AFGC understand would be beneficial to increase recycling rates and recycled content rates.

Increasing recycling rates and recycled content to stimulate a circular economy

The AFGC and its member companies support the National Packaging Targets that have been jointly agreed by APCO and industry. As Diagram A1.1 below highlights, both plastic and glass have recycling and local utilisation rates below the agreed targets.

Diagram A1.1: Australian Recycling and Local Utilisation Rates

Material	Recycling Rate			Packaging Local Utilisation Rate	Recycled Content Target
	MSW	Packaging	National Packaging Target		
Plastic	12.3%	32.0%	70.0%	14.0%	30.0%
Glass	52.6%	50.0%	Not Specified	36.0%	30.0%

Source: National Waste Report 2017/18 & APCO Material Flow Analysis February 2019

1. GLASS – SOURCE SEPARATED COLLECTIONS

As detailed above in diagram A1, there is opportunity to increase both the recycling rate and the local utilisation rate of glass within Australia.

Glass crushing for civil construction

The AFGC supports recent initiatives in Victoria and New South Wales where glass crushing plants have been established to produce glass sand for use in civil construction and road projects and in turn increase the recycling rate of glass. Additionally, the AFGC understands that greater recycling and recycled content rates could be achieved through reducing contamination found in commingled recycling collections.

Source separation of glass or paper

The AFGC has recently been in discussions with secondary glass processors who have indicated that the recycled content of glass used in Australian furnaces is approximately half of that used in New Zealand furnaces due to the high levels of contamination found in Australian MRF cullet. It was stated that **New Zealand furnaces contain approximately 60-75% recycled glass, versus Australian furnaces accepting approximately 20-30% recycled glass.**

Further environmental benefits were also mentioned, firstly, as recycled glass melts at a lower temperature energy use is reduced, and secondly, recycled glass produces lower carbon emissions during processing than virgin materials as carbon is only released when virgin materials are processed.

The reason New Zealand furnaces can process double the recycled content / tonne of Australia is due to the New Zealand source separating kerbside glass, and in doing so dramatically reducing the contamination. The AFGC therefore, supports trials such as Yarra City Council where glass is being collected separately, and the [APCO Project 1.3: Economic analysis of alternative collection systems and end markets](#), assessing the economic sustainability of alternate collection systems.

The New Zealand experience not only reduces the contamination of glass but also eliminates glass fragments being embedded in paper and cardboard. The flow on impact is that the value of both glass and paper is increased exponentially. As glass and paper represent approximately 70-75% of MRF feedstock, the resultant increased income for MRF operators could be used to offset processing costs and ultimately reduce the cost burden on Councils and the ratepayer. Opinions from MRF operators and collectors have varied relating to whether it is preferable/optimal to collect glass separately or paper separately (as in Northern Beaches Councils in NSW). Views expressed inferred that it would be preferable to collect paper separately due to the expected increased value of paper exceeding the expected increased value of glass.

The AFGC also recommends consideration of the following kerbside collection frequencies to minimise the impact on collection costs. As source separation will not impact the generation rate of household materials, an additional paper or glass bin could be provided to households with it being collected on alternate monthly cycles to the commingled recycling bin as summarised in diagram 4 below:

Diagram A1.2: Recommended recycling bins collection schedule

<i>Stream</i>	<i>Current</i>	<i>Proposed short to medium term</i>	<i>Proposed long term</i>
Garbage	Weekly	Weekly	Fortnightly
Recycling – commingled	Fortnightly		
Recycling – paper or glass		Monthly	Monthly
Recycling – remaining materials		Monthly	Monthly
Organics	Fortnightly		
Food Organics		Fortnightly	Weekly
Total Collections / Week	2 Bins	2 Bins	2 Bins

From prior experience in the waste industry and discussions with Councils that have implemented weekly food organics collection services, the AFGC recommends food organics collections be implemented in a staged approach. The experience of many Councils implementing weekly food organics collections was a

substantial rise in contamination of the food organics bin and/or the recycling bin in the week the general waste bin was not collected. Anecdotal evidence and bin audits suggest that food organics bins and recycling bins have been used for putrescible waste, such as nappies, on the week the general waste bin was not collected. This has the impact of further devaluing the materials contained in the food organics and recycling bins and ultimately increases costs to Councils and ratepayers. It is therefore recommended that food organics collections are implemented on a fortnightly basis (as offered in South Australia with resultant leading diversion rates) and transitioned to weekly collections over time once community has engaged with, and understands the benefits of food organics collections.

If the above collection frequency proved successful, the additional cost to Councils and ratepayers would be limited to the cost of a bin. At approximately \$45.00 / bin over a 20 year period, this equates to \$2.25 per property per annum, a cost surely to be offset by the increase in glass and paper values.

Should the New Zealand system of source separating glass be replicated in Australia, **not only would the recycling rate of glass packaging double, the recycled content rate of packaging would also double over night stimulating a circular economy.**

2. PLASTICS - INCREASE AUSTRALIAN SECONDARY PROCESSING

As detailed in diagram A1.1, the current recycling rate of plastic packaging of 32.0% is approximately 3 times the national MSW average of 12.3%; however this is still well short of the 70% target contained in the National Packaging Targets.

Furthermore, the current local material utilisation rate of 14.0% is well short of the 30.0% recycled content target contained in the National Packaging Targets. Therefore, considerable effort and infrastructure is required to increase both the plastic recycling rate and recycled content rate to achieve the National Packaging Targets by 2025.

As the majority of plastic has been exported to Asia for almost 20 years, brand owners have little option but to buy imported plastic packaging. It is impossible to buy local packaging if it isn't available locally.

Additionally, the impact of the 2018 China Sword policy, the recent closure of other Asian markets and the pending export restrictions of the Basel Convention on mixed plastics highlights the urgent need to develop local plastic processing infrastructure. The AFGC believes the following action is required:

- Phase 1: Implement national MRF specifications, and
- Phase 2: Increase MRF sorting capability, and
- Phase 3: Increase local secondary plastic processing capacity

Phase 1: Implement national MRF specifications

The National Packaging Target of designing all packaging to be *100% reusable, recyclable or compostable by 2025*, is only achievable if a nationally consistent product acceptance criteria is established for all MRF's. It is currently impossible for brand owners to design packaging to be recyclable in approximately 140 MRF's if they all have different acceptance criteria.

In the absence of such national standards, the AFGC supports the use of the [Australian Recycling Label](#) (ARL) as it provides a national recycling benchmark for brand owners to use when designing packaging for recycling.

To aid the development of recyclable packaging, reduce community confusion, reduce contamination & ultimately increase the value of sorted materials we urge DWER to collaborate with APCO (Project 4), MRF operators, local councils and policy makers to implement state/nation-wide product acceptance criteria for all MRFs (ie: Accepted product list).

Phase 2: Increase MRF sorting capability

As the China Sword policy and the recent tightening of Malaysian import regulations have been implemented largely due to contamination concerns, and considering the amendment to the Basel Convention that will prohibit the exportation of mixed plastics from 2021, the AFGC believes there is a need to set specifications for MRF sorting capability.

There is an apparent need for MRF's to install optical sorters to sort PET and HDPE from mixed plastics, or alternatively, there is a need for secondary facilities to be established that provide this sortation service for smaller MRF's where this may not be economically viable.

These separated materials could then be sent secondary processing facilities that recycle PET, HDPE and mixed plastics to maximise their value and recycling rates.

Phase 3: Increase local secondary plastic processing capacity

As stated above, brand owners are unable to buy local recycled content if it is not available locally. Therefore, the AFGC believes the following secondary recycling infrastructure is required to firstly, increase recycling rates, and secondly, to increase recycled content in packaging:

1. Food grade rPET recycling infrastructure
2. Food grade rHDPE recycling infrastructure
3. Alternate waste technology for processing plastics #3-7

According to the [APCO Material Flow Analysis](#) published in February 2019, the plastic packaging recycling rate is 32% with the plastics #3-7 representing the greatest opportunity for recycling at 48.5% of plastic packaging as summarised below in diagram A1.3.

Diagram A1.3: Plastic packaging recycling rates

Material	Tonnes generated		Tonnes recovered		Recovery Rate
Total Plastic	907,401	100.0%	287,502	100.0%	32%
PET	138,585	15.3%	40,764	14.2%	29%
HDPE	328,727	36.2%	96,883	33.7%	29%
PVC	17,014	1.9%	4,794	1.7%	28%
LDPE	220,148	24.3%	61,518	21.4%	28%
PP	101,464	11.2%	27,156	9.4%	27%
PS	26,913	3.0%	8,022	2.8%	30%
Other	74,551	8.2%	48,365	16.8%	65%
Total 3-7	440,090	48.5%	149,855	52.1%	34%

1. Food Grade rPET

The recent [announcement](#) by Coca Cola that it will introduce 100% recycled content on all products <600ml in their Coca Cola, Sprite, Fanta, Mount Franklin and Pump 750ml brands by the end of 2019 has signalled the opportunity for Australian processing. It must however be stressed that the recycled material must food grade and fit for purpose to avoid any food safety, quality or food waste issues. This must be assessed on a case by case basis as chemical migration from packaging varies by food type.

2. rHDPE

There is also a growing need for recycled HPDE. As recently [announced](#), Unilever Australia will move to introduce Australian sourced post-consumer recycled plastic for bottles of locally made and well-known Home and Personal Care brands such as OMO, Dove, Surf, Sunsilk and TRESemmé.

Again, caution must be exercised due to concerns of taint from recycled HDPE contaminating food or grocery items causing food and product safety, quality or waste issues. Some brand owners are currently pursuing food safety testing or investigating the installation of multi-layered HPDE packaging where virgin material is used internally for product/food contact and recycled content is used on the outer layer. Due to the high cost of upgrading manufacturing production lines, government support in the form of grants would be required as provided by the [NSW EPA](#) Product Improvement Program.

3. Alternate waste technology for processing plastics #3-7

Alternate waste technology for plastics #3-7 could include expanding the use of plastic in road making such as [Downers](#) recent trials in partnership with Close the Loop and REDcycle. Alternatively, consideration should be given to emerging chemical processing technologies that aim to convert end of life plastics to oil or oil based products such as diesel, petrol, kerosene, LPG or wax.

Several technologies exist, including gasification, pyrolysis or the Australian hydrothermal upgrading platform, the [Cat-HTR™](#) innovation developed by Licella.

The benefit of chemical processing is that end of life plastics are returned to oil and can therefore be reprocessed into new virgin packaging without the concerns of chemical migration or taint that may cause health and safety issues for the community, creating a true plastics circular economy.



Submission

**Western Australian Government Review:
*Let's not draw the short straw -
reduce single-use plastics***

12 July 2019

About

The Australian Fresh Produce Alliance (AFPA) is made up of Australia's key fresh produce growers and suppliers. The members include:

- Costa Group,
- Perfection Fresh,
- Montague,
- One Harvest,
- Pinata Farms,
- Fresh Select,
- Mitolo Group,
- Mackay's Banana Marketing,
- Driscoll's,
- 2PH Farms,
- LaManna Premier,
- Rugby Farming,
- Freshmax, and
- Fresh Produce Group.

These businesses represent:

- half the industry turnover of the Australian fresh produce (fruit and vegetables) sector - \$4.5 billion of the \$9.1 billion total,
- a quarter of the volume of fresh produce grown in Australia - 1 million of the 3.9 million tonne total,
- more than a third of fresh produce exports - \$410 million of the \$1.2 billion export total,
- more than 1,000 growers through commercial arrangements, and
- more than 15,000 direct employees through peak harvest, and
- up to 25,000 employees in the grower network.

The key issues the AFPA is focusing on include:

- packaging and the role it plays in product shelf life and reducing food waste landfill,
- labour and the need for both a permanent and temporary supply of workers,
- market access to key export markets for Australian produce,
- product integrity both within and outside of the supply chain,
- pollination and research into alternative sources, and
- water security, including clear direction as to the allocation and trading of water rights.

The AFPA's aim therefore is to become the first-choice fresh produce group that retailers and government go to for discussion and outcomes on issues involving the growing and supply of fresh produce.

Products grown by AFPA Member companies include:

Apples	Broccoli	Fioretto	Oranges	Strawberries
Apricots	Broccolini	Green Beans	Peaches	Sweet Corn
Asparagus	Brussel	Herbs	Pears	Table grapes
Avocado	Sprouts	Lemons	Pineapples	Tomatoes
Baby Broccoli	Butternut	Lettuce	Plums	Water Cress
Baby Corn	Pumpkin	Mandarins	Potatoes	Wombok
Bananas	Cabbage	Mango	Cucumber	
Beetroot	Cauliflower	Mushrooms	Raspberries	
Blackberries	Celery	Nectarines	Salad leaf	
Blueberries	Cherries	Onions	Spinach	



Summary

Australian consumers are concerned about the impact of plastics, from all sources, on the environment and the relative impact of their different purchasing decisions. For fresh produce, packaging plays an important role in the integrity and protection of food as it travels through supply chains from farm to plate. Critically, product protection should be the primary goal of packaging as food waste generally accounts for a larger proportion of the life-cycle environmental impacts of the food-packaging system.

In order to meet the public policy objectives of supporting Australians and increasing our overall sustainability, governments can work with industry on:

- developing environmentally friendly packaging solutions,
- encouraging the reduction of non-essential packaging, and
- supporting the collection, processing, recycling and reuse of packaging materials.

The Alliance asks all parties to ensure that any action to 'improve' current practices fully considers the complexity of current arrangements and ensures that the proposed action is of overall environmental benefit over the long term.

Introduction

Australians have a strong track record in addressing litter through initiatives such as *'Keep Australia Beautiful'*. Australian consumers are concerned about the impact of plastics, from all sources, on the environment and the relative impact of their different purchasing decisions. Fresh produce packaging has been a focus in the public discourse however unlike many other products, fresh produce has a relatively short shelf life and product packaging helps to maintain shelf life and reduce food waste.

For fresh produce, packaging plays an important role in the integrity and protection of food as it travels through supply chains from farm to plate. Critically, product protection should be the primary goal of packaging as food waste generally accounts for a larger proportion of the life-cycle environmental impacts of the food-packaging system.

Industry Approach

The Australian Fresh Produce Alliance (the Alliance) recognises there is concern about the level and type of packaging that is used for fresh produce and has prioritised packaging as one of the six key issues to address for the future of the fresh produce industry. Individual member companies have been working through their packaging options for more than 3 years to increase recyclability and reduce non-essential packaging.

The Alliance will soon release research on the role of packaging for Australian fresh produce, which highlights that packaging plays an important role in addressing food waste in the supply chain and increasing product shelf life. The research was commissioned by the Alliance and was aimed at examining and understanding the role packaging fulfils in minimising food waste, and maximising quality control in order that Australian consumers can eat fresh quality produce on a regular basis.

The Alliance also recognises that it must work to reduce packaging where it reasonably can and to identify forms of packaging which provide greater opportunity for not only recycling, but also the manufacture of plastic packaging from recycled content.

This research is also important when considering that an estimated 7.3 million tonnes of food valued at \$20 billion is lost or wasted in Australia every year. This is at a time of growing rates of obesity in our



adult and child population due to poor dietary intake of fresh fruit and vegetables, leading to the development of preventative and chronic diseases, including type 2 diabetes.

Health and Nutrition

Despite the known benefits, consumers do not take in sufficient quantities of fruit and vegetables. The latest National Health Survey found that just over half (51.3%) of Australian adults met the guidelines for the recommended minimum 2 daily serves of fruit (Australian Bureau of Statistics, 2019). Over recent decades the rates of chronic disease, including type 2 diabetes, have been increasing both in adults and children (Obesity Policy Coalition, 2018).

It is predicted that, by 2023, health expenditure for type 2 diabetes will have risen \$1.4 billion to \$7 billion per year, due mostly to increasing weight gain (National Health and Medical Research Council, 2013). If current Australian trends continue, an estimated 83% of men and 75% of women aged over 20 years will be overweight or obese by 2025 (National Health and Medical Research Council, 2013). Therefore, it is important to utilise strategies which ensure access to food that is nutritious, both for the individual and in addressing broader public health issues.

A primary objective of food production is to ensure a safe and acceptable product to be delivered to market. Packaging may serve to transport nutritious produce, such as fruit and vegetables, safely to consumers all over Australia with minimal waste. If people are to consume more fruit and vegetables and in turn reduce their risk of contracting chronic diseases, it is therefore important to provide consumers with a product which is of a high quality and maximises its shelf life.

A way forward

If we are aiming to '*reduce the environmental impacts of Consumer Packaging*'¹ and increase the overall sustainability of our economy, then we need to consider the overall impact of our decisions rather than individual issues in isolation.

For example, in fresh produce there are conversations about changing material types to address consumer concern but the replacement material may have a more significant environmental impact. The Alliance encourages all supply chain participants and governments to consider consumer behaviour in the development of new regulation, policy proposals and requirements for consumers.

The Alliance will be releasing new research and industry commitments in the coming weeks and we look forward to sharing that information with the Western Australian Government to inform consideration of regulation, policy and procedures. Through our work it has become clear that further work is required to understand consumer behaviour, particularly in the home, to better provide consumers with products and services that meet their needs in the most sustainable manner.

In order to meet the public policy objectives of supporting Australians and increasing our overall sustainability, governments can work with industry on:

- developing environmentally friendly packaging solutions,
- encouraging the reduction of non-essential packaging, and
- supporting the collection, processing, recycling and reuse of packaging materials.

The Alliance asks all parties to ensure that any action to 'improve' current practices fully considers the complexity of current arrangements and ensures that the proposed action is of overall environmental benefit over the long term.

¹ Australian Packaging Covenant 2017 <https://www.packagingcovenant.org.au/documents/item/1037>





Australian Packaging Covenant Organisation

12 July 2019

Reducing Single-use plastic
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919
Via email: plastic-action@dwer.wa.gov.au

Australian Packaging Covenant Organisation submission

Let's not draw the short straw: Reduce single-use plastics issues paper

1. Executive Summary

The Australian Packaging Covenant Organisation (APCO) welcomes Western Australia's initiative to address the environmental impacts of single-use plastics, and the opportunity to provide a submission on the April 2019 Issuers Paper.

APCO is a not-for-profit company established to administer the Australian Packaging Covenant on behalf of the Australian, State and Territory Governments, and its industry signatories. The Australian Packaging Covenant is part of a co-regulatory product stewardship framework established under national legislation to reduce the harmful impact of packaging on the Australian environment.

On 27 April 2018, Australia's Environment Ministers announced a historic target to make 100 percent of packaging in Australia reusable, recyclable or compostable by 2025 or earlier, and committed governments to working with APCO to achieve this. Industry has taken this commitment further through the adoption of additional 2025 National Packaging Targets. To achieve these targets, APCO is implementing a series of projects in 2019, a number of which address single use plastics. APCO also recognises the crucial role that State and Territory Governments will play in helping to achieve the 2025 National Packaging Targets, including by taking and supporting planned, strategic action to reduce single use plastics.

In response to the Issues Paper, APCO makes the following six recommendations:

1. Prioritise actions based on clear objectives and sound evidence
2. Where possible, leverage and align with national and international initiatives
3. Consider life-cycle impacts
4. Deploy a systemic approach to sustainable packaging
5. Implement a phased approach, recognising and addressing system barriers and interventions
6. Recognise and support industry leadership.

Australian Packaging Covenant Organisation Ltd.

ABN 99 056 538 480 | (02) 8381 3700 | www.packagingcovenant.org.au

PO Box Q1523, Queen Victoria Building NSW 1230 | Suite 1102, Level 11, 55 Clarence Street, Sydney NSW 2000



Australian Packaging Covenant Organisation

APCO welcomes the Western Australian Government's initiative to address the environmental impacts of single-use plastics and we look forward to working with and supporting the Western Australian Government to reduce use of single use plastic packaging. In this submission, APCO has sought to address those sections or themes of the Issues Paper of greatest relevance to our mandate. The submission outlines a range of projects that APCO is undertaking with its Members and partners in 2019 to address single use plastics, and offers six recommendations for the Western Australian Government.

2. APCO's projects on single use plastics

APCO acknowledges the support that the Western Australian Government has shown for APCO's work to date, and the recognition provided through the Issues Paper of the role of the Australian Packaging Covenant in addressing single use plastics.

Several of APCO's priority projects for 2019 deal with single use plastics, including phasing out problematic and unnecessary single use plastics, and composting. These projects, described below, will contribute to achievement of the 2025 National Packaging Targets. APCO welcomes ongoing discussion with the Western Australian Government on how these projects could support the Government's objectives on single use plastic packaging.

Project 3: White paper on problematic and unnecessary packaging

This white paper, scheduled for completion in August 2019, will look at standardised national approaches on single use plastic packaging, such as agreed definitions of 'problematic' and 'unnecessary', and prioritising items to phase out.

Projects 7 & 15: Compostable Packaging

APCO is implementing the following projects dealing with compostable packaging, which will ensure that if compostable packaging is used as a replacement to single-use plastics, this can be done with a sound understanding of the necessary technical and process requirements. The projects are:

- Project 7: Compostable packaging labelling program: gathering information to underpin the establishment of an evidence-based compostable labelling program.
- Project 15: Compostability trials: demonstrating the processing of packaging materials certified under Australian Standard AS 4736–2006, in various types of organics processing facilities.

Project 6: Food Service Packaging Guidelines

This project is engaging the food services sector to produce case studies, and resource guides to address single use, problematic/unnecessary and compostable packaging applications.



Australian Packaging Covenant Organisation

Project 14: Models for phasing out single use plastics

This project will support pilot projects that test different approaches to community-based Plastic Free Places programs, and supporting the development of a voluntary code to phase out heavier, single-use plastic bags. The Plastic Free Places program will be delivered through a partnership with Boomerang Alliance and will build on BA's *Plastic Free Noosa* program. The program will take a systematic and phased approach to addressing supply chain gaps and challenges.

3. Feedback and recommendations on the discussion paper

3.1 Prioritise actions based on clear objectives and sound evidence

The Issues Paper outlines several problems associated with single use plastics, including the environmental impacts of litter on aquatic and terrestrial environments, and contamination of waste treatment facilities. Before deciding on any course of action, it will be important to identify clearly the specific objectives of each action in relation to these problems, and to ensure that the actions are appropriately designed and targeted to achieve the intended results.

As noted in the Issues Paper, there are a number of existing programs in Western Australia and elsewhere that provide model approaches to reduce or eliminate some priority items. However, to design and implement broader approaches to address single use plastics, it will be important first to understand the journey that single use plastics take along the entire supply chain, and establish a baseline of data to measure change and the effect of interventions. It will also require consideration of life-cycle and whole-of-system approaches.

APCO can assist in building the evidence base by providing data and analysis in relation to plastic packaging. The *APCO Packaging Material Flow Analysis 2018* (available at <https://www.packagingcovenant.org.au/documents/item/2171>) combines data from government, industry and academic sources, expert interviews and peer review, to help build understanding of the lifecycle of Australia's post-consumer packaging. APCO is building on this knowledge through several projects looking at packaging consumption and recycling data, and collection, sorting and recycling capacity, and will be able to make the findings of this research available to the Western Australian Government in the second half of 2019.

3.2 Consider life-cycle impacts

APCO recommends adopting a holistic, life-cycle approach to the issue of single-use plastics to minimise any unintended impacts from the transition to other single-use alternatives. Where alternatives exist, environmental and other impacts across their lifecycle should be assessed to inform policy decisions.



Australian Packaging Covenant Organisation

3.3 Deploy a systemic approach to sustainable packaging

Similarly, APCO recommends that a systemic approach be adopted, underpinned by a roadmap and investment plans identifying how challenges such as gaps in knowledge, infrastructure and systems will be addressed. By considering the entire system, decisions can be made about the most effective and efficient way of achieving the Government's objectives in relation to specific items.

Where a decision is made to phase out a single-use plastic item, systemic approaches includes ensuring that businesses and consumers have appropriate access to suitable alternatives, and that the alternative items can be appropriately managed at end of life. The timeframes for phasing out items need to take into account time required for businesses to deploy new products and processes, for the establishment and effect of consumer education and behaviour change programs, and for any necessary infrastructure and recovery systems to be implemented.

For example, where certified compostable alternatives are chosen, these must be fit for purpose, consumers must be able to distinguish certified compostable packaging from other biodegradable packaging, the correct disposal method must be communicated, and dedicated collection and processing infrastructure must be in place.

3.4 Implement a phased approach, recognising and addressing system barriers and interventions

Particular account will need to be taken of product safety and security, waste impacts (particularly in relation to food waste), packaging accessibility, and regulatory requirements (e.g. for health, pharmaceutical and food packaging). These issues present many challenges, solutions to which will take time to develop and implement. APCO's Members, across many industries, are engaged in considerable work to overcome these challenges.

3.5 Where possible, leverage and align with national and international initiatives

APCO welcomes the Western Australian Government's recognition, evident in the Issues Paper, of the substantial body of policy development and program delivery occurring on single-use plastics in Australia and internationally.

Packaging and other plastics, as well as the companies that manufacture, sell and use them, exist within global supply chains, both as new products and as waste materials. An international focus is increasingly important, to ensure that plastic packaging sourced overseas can be reused, recycled or composted in Australia. APCO is working with leading international organisations, such as the Ellen MacArthur Foundation and WRAP UK, towards internationally consistent approaches. Within our own region, APCO is continuing to work with partners in New Zealand to ensure alignment and shared approaches, including through the shared implementation of the Australasian Recycling Label.

Similarly, within Australia, there is a risk of differing approaches between jurisdictions adding complexity to industry's task of reducing single use plastics within national supply chains. APCO would welcome broad

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PO Box Q1523, Queen Victoria Building NSW 1230 | Suite 1102, Level 11, 55 Clarence Street, Sydney NSW 2000



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alignment between approaches. As the national body responsible for leading achievement of the 2025 National Packaging Targets, APCO is committed to national approaches.

Alignment with other jurisdictions is particularly important for public-facing programs, in order to provide consistent messaging to the community. One such program is the APCO Packaging Recycling Label Program, which aims to remove recycling confusion for consumers. We would welcome the opportunity to discuss further with the Western Australian government how the promotion of this program to consumers in Western Australia could help to reduce contamination rates in Western Australia's recycling streams.

3.6 Recognise and support industry leadership

The Western Australian Government's intent in addressing single use plastics is, in broad terms, consistent with that of APCO's Members, which are working towards the 2025 National Packaging Targets. APCO's approximately 1500 Members bring to the table extensive capabilities, supply chain influence and willingness to drive change towards sustainable packaging in Australia. Opportunities for industry and government to work together, include sharing data and knowledge to help build evidence for policies and programs, implementing trials and pilot projects, and delivering industry and consumer education initiatives.

4. Conclusion

APCO appreciates the opportunity to outline our views on Western Australia's discussion paper. As the co-regulatory organisation charged with responsibility for managing the sustainable packaging pathways in Australia we have a unique insight and ability to support Western Australia. The impact of single-use plastics on the environment is a complex issue that requires systemic collaboration across the packaging eco system to address. We look forward to working with the Western Australian Government in our journey towards the 2025 National Packaging Targets. And to ensuring the approach taken to single-use plastics integrates best practice models that meets the needs of industry, government and community.

From: [Blair Darvill](#)
To: [Plastic Action](#)
Subject: Info re supporting the use of BYO containers by food retailers.
Date: Wednesday, 29 May 2019 11:11:42 AM

Hi there

I recently attended a workshop in Albany on the 'Let's Not Draw the Short Straw' program and issues paper. Thanks for the opportunity to attend and share my views.

I have started a small local campaign to have the choice of using BYO containers at my local supermarket and I would appreciate any further support and info you may have to assist me with this.

I was told by the supermarket that 'we're not allowed to and call the council'.

On investigation I found that the Australian and NZ Food Safety Standards do allow the use of BYO containers, and it is up to the individual business to have their own policies.

I have rung and visited many supermarkets in the great southern, some support using BYO containers, some don't know and others just refuse it.

I have come to the conclusion that with a bit of careful explanation of the actual rules, identifying that many retailers support it without a problem and perhaps a few example policies and processes we can increase the number of food outlets to support using BYO containers.

I'm aware there was a meeting with local governments as part of DWER's workshop's and meetings on the SUP issue, it would be great to get any contacts or summary of the meeting that might support this cause.

I also think that once we have a few local wins we can use this on a state basis.

Kind regards

Blair Darvill



www.human-nature.com.au



Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DCWA 6919

Plastic-action@dwer.wa.gov.au

12 July 2019

**Submission on *Let's Not Draw the Short Straw*
Reduce Single-use Plastics Issues Paper 2019**

Thank you for the opportunity to provide comment on this issues paper.

Preamble

As the issues paper identifies, plastic pollution, and single use plastics in particular, pose a threat to both wildlife and the environment. These plastics, because they are designed for single-use also represent a major waste problem and, as they are largely products derived from fossil fuels, contribute to continuing greenhouse gas emission increases.

Plastic pollution is now an identified global and domestic problem with estimates that over 8 million tonnes of discarded plastics are entering the ocean every year. In Australia the CSIRO have concluded that two thirds of marine debris found in waters off the Australian coast is plastic, with most from local sources. Your issues paper cites that both Keep Australia Beautiful and Tangaroa Blue have found that 75% of the rubbish found on Western Australian beaches is plastic.

The UN Environment Program has initiated a global response that includes Australia. Member nations of the G20 have made similar commitments to action. In Australia, most jurisdictions and including Western Australia, have introduced bans on lightweight plastic bags and deposit schemes on containers. Many jurisdictions are now considering their next policy actions to address other single-use plastics, particularly takeaway items.

It is our strong view that plastic pollution is ideally suited to the application of the precautionary principle. There is demonstrably a significant and accumulating risk and there is no need to engage in long running studies to show a 'likely' impact, before action.

Our Commentary

Single-use plastics pose a significant environmental problem. It is well documented (including in this paper) that single use plastics are causing environmental problems. This

fact has been recognised globally with most governments around the world seeking to introduce policies to address the problems. Most of these problems come from the littering of plastic products. This leads to pollution of the environment, harm to wildlife and the likely introduction of plastics into the human food chain. What is less appreciated is the enormous accumulation of plastic wastes in landfill and other storage. We need to recognise this as a significant problem and fundamentally, a large waste of resources. Applying the principles of a circular economy dictates that these products are an environmental problem both as litter and as waste. As products derived from fossil fuels, they add considerably to the carbon account. Shifting attitudes about plastic waste also leads to greater awareness about resource recovery and minimisation.

As all single use plastics cause problems it is important to recognise them. The process of applying a strategy of continuous improvement will assist in identifying the most important. It would seem logical to address the most obvious risky single use plastics, particularly those that represent a litter problem and have readily available alternatives.

The ban on lightweight plastic bags has always been seen as a first step to phasing out plastic carrier bags in favour of genuinely reusable BYO bags. It is therefore apparent that the ban should be extended to thicker bags. All jurisdictions have supported an investigation into a thick bag phase out, an investigation on behalf other jurisdictions is currently being undertaken by the QLD Government. We expect that a proposal will be tabled at the next MEM, in collaboration with national retailers and APCO. This proposal should be a mandatory measure and be effective and timely.

Our view is that Western Australia, as part of a national phase-out, should prohibit single use plastic bags up to 70 microns thick (as New Zealand has just done). Business and community are already on the way to shifting their practices, with a significant number in the community switching to reusable bags (that can be used many multiple times). Phasing out thick bags should be seen as a continuum of this process, as they are not genuinely reusable, most often only being used once or twice. Giving fair warning provides, consumers, retailers and suppliers time to change and reduces opposition. In our discussions with business there is acceptance of extending the ban.

Checkout and produce bags should not end up in landfill. The National Waste Policy targets all packaging to be reusable, compostable or recyclable (the public will interpret this to mean that they actually are reused, composted or recycled). In the case of produce bags, the agenda is therefore set. The question becomes one of preference and achievability. What type of packaging is most likely to be reused, composted or recycled? And what are the services available for them to be so? Applying the waste hierarchy to the question, the best is reusable and the least recyclable. The Government should examine and resolve any issues and promote BYO bags and containers by consumers.

The suggested phase-out of single-use plastic, non-compostable takeaway items should be supported. It represents the next obvious policy step in addressing plastic pollution. The phase-out list should include coffee cups/lids, straws, stirrers, cutlery, containers, bags. Water bottles could be included, although they are subject to the CDS. These items are problematic waste and litter items and have alternatives available. These would represent

the first step in the transition away from single-use plastic items. They are the low-hanging fruit.

Plastic microbeads are a national problem and should be addressed at a national level.

Whilst the current voluntary phase-out is welcomed, it is disappointing it has not been mandated. It also does not cover all products that contain microbeads (e.g. floor polish). It also does not prevent free-loaders taking advantage or manufacturers reversing their practices in future. For example one of our supporters has informed us she was recently sent a free shampoo sample with microbeads.

We endorse states moving unilaterally on the next range of items. Such action will lead to national coverage faster than engaging in the time consuming Commonwealth processes (and may prompt national action faster if agreed).

Good labelling is essential. The Australian Packaging Covenant Organisation (APCO) is currently developing labelling to assist public understanding. The recycling symbol which gives many the impression that something is recycled rather than is recyclable is particularly confusing. Labelling should be more honest and provide instructions of how to compost or recycle. If these services are not available or utilised, the packaging should make clear that the discarded package will be landfilled.

For compostable takeaway products, these should be more clearly identified BIOPAK cups have a green band but this is not clearly identifiable as compostable. These products identified with a big C (compostable) would help. Collection bin signage needs review, particularly with the likely introduction of more public compost bins. Signage will help reduce contamination, although design and engineering solutions that prevent other materials being deposited also need to be used.

Good signage and monitoring public bins introduced at festivals and organised events can assist event organisers and public understanding. Boomerang Alliance has developed standard plastic free event guidelines that are available for use www.plasticfreeplaces.org

Setting the Right Policies

95% of all plastic packaging is used once and then thrown way (as waste or litter) *The New Plastics Economy Report 2017 Ellen Macarthur Foundation/World Economic Forum*

In addition to policy action by government, over 400 major global brands have committed to a *Vision of a Circular Economy for Plastics*. Those brands include Tupperware, Colgate-Palmolive, Coco-Cola, Pepsi, Unilever, Nestle' and MARS.

That vision includes the elimination of problematic and unnecessary plastic packaging, reducing the need for single-use packaging through re-design, having all packaging reusable, compostable or recyclable by 2025. We note that this vision should be expressed as - all packaging reused, composted or recycled by 2025.

Whilst these brands have identified the problems and made commitments, it is incumbent upon government to now design the right policy setting to ensure that this happens. Without such policy there is no guarantee these brands will meet their commitments, and on time.

The National Waste Policy has identified targets to address problematic single use plastics by replicating the international targets (above) by having all *plastic packaging reusable, compostable or recyclable by 2025*. The April 2018 Meeting of Environment Ministers (MEM) endorsed this target.

The Australian Packaging Covenant Organisation (APCO) has set a target of having 70% of packaging *composted or recycled* by the same date.

The question for all jurisdictions is how to achieve this target effectively and efficiently, and on schedule?

The most obvious problematic single-use plastics is takeaway food ware. These are referenced in this options paper and include, coffee cups/lids, straws, containers, cutlery, bags and plastic water bottles. All these products have readily available alternatives.

By setting a phase out for these products, the transition to the goal of all packaging being reusable, compostable or recyclable can get underway. We note that NWP the target should be re-framed so that all packaging is *reused, composted or recycled by 2025*.

A phase-out of identified single use plastics is the policy driver to achieve the NWP and APCO targets. It will ensure that measures to switch takeaway practices to the provision of reusable or 100% compostable products will take place.

Reusable products, coffee cups, cutlery, cups and containers, bottles and bags are the preferred choice of many in our communities. Many cafes and food outlets provide these items, offer discounts to customers and generally encourage reusable food ware. Reusables are the best choice for takeaway and it must remain a goal to make reusable takeaway common practice in every community.

In an ideal world we would only dine-in at cafes and restaurants or, if taking away, use reusable and returnable containers and utensils. Our position should always favour these options.

However, takeaway using disposable containers and utensils is now the norm and this needs to be recognised and addressed

Currently, whether taking away from a café, a market, public event or festival, single use plastic food ware is the predominant choice. Most of these products are either non-recyclable or are recyclable but are rarely recycled. An increasing amount is compostable.

Boomerang Alliance takes the view that whilst the preferred option is reusables, that where this is not possible or impractical, that 100% certified compostable food ware should become the only option.

100% compostable food ware provides the transition towards reusables, without creating a hospitality business sector and community backlash. It allows the hospitality sector to continue providing takeaway services with little impact on business. These products derived from natural and plant materials, also reduce dependence on fossil fuels.

Compostable products represent a viable transitional material to replace single-use plastics in many scenarios, but efficacy is dependent on the following considerations:

- Products entering the market with an end of life pathway to industrial composting MUST be certified to Australian standards to avoid greenwash and prevent low quality products entering the waste stream. A higher threshold of 'home compostable' would be the ideal outcome, as many consumers are currently confused by the terminology surrounding compostable materials, which can lead to perverse outcomes.
- Accompanying investment must be made to build and operate commercial composting facilities. Making the switch from single use takeaway to compostable takeaway is the first step and should be accompanied by strategies to arrange effective collection and composting
- Collection and handling systems must be established to separate compostable materials from the waste stream, particularly in an out-of-home context, to ensure that they reach composting facilities for processing. Good labelling is essential and currently does not exist. For instance, without a trained eye it is nearly impossible to distinguish between a recyclable or compostable coffee cup. This needs to be rectified.

The Boomerang Alliance Policy recommends:

1. The use of reusable crockery and utensils for the consumption of food and drinks at cafés, restaurants and food vendors (including at events) and by private persons in public places and functions.
2. The use of reusable and returnable food ware (ie. Plastic/other material reusables) and containers for food and drink from cafés, restaurants and food vendors (including at events) and by private persons in public places and functions.
3. The prohibition of all polystyrene containers and food ware by cafés, restaurants and food vendors (including events) and their use by private persons in public places and functions. Polystyrene is toxic in the environment, is a regular litter item and is usually not recycled. In landfill, as in the environment, it persists and does not break

down. The use of polystyrene cups, lids and containers of any kind must stop. Polystyrene can be easily replaced with better alternatives.

For takeaway, our hierarchy is:

- Use of items manufactured entirely from natural organic materials such as paper/card, wood or cane or other plant materials and certified to Australian Composting Standards AS 4736 or AS 5810. These should also be certified from sustainable sources.

These compostable items eliminate the use of single use, non-biodegradable plastic items but will not necessarily prevent litter or waste. Collection and processing services are still required.

Oxo-degradable/biodegradable plastic products are **NOT** endorsed.

Compostable/biodegradable/degradable plastic bags are **NOT** endorsed.

We therefore recommend that a first step in addressing problematic and unnecessary single use plastics is the phase out of identified (non-compostable) single use plastic items that include coffee cups/lids, straws, cutlery, cups and containers and plastic bottles.

This phase-out must be accompanied with an effective program to engage providers (hospitality, food outlets, retailers and event organisers) how to switch away from single use plastic items. Setting a date for a phase-out which gives time to transition to preferred alternative practices is highly recommended.

The WA Government has made a start by directing all government agencies to stop buying some identified single use plastics. This is to be welcomed and sets a good example for others. If it has not been, this directive should be extended to any café service providers operating in government buildings and for vendors at government public events.

This directive gives credibility to the WA Government when, as it needs to do, to encourage businesses and corporations, local government and community organisations to follow this lead.

It is important to engage in a meaningful way with target audiences. The DWER engagement campaign in the lead up to the plastic bag ban is a small but good example of direct communication with a target audience that made a difference. In the case of single-use plastic takeaway, direct engagement with hospitality and events will deliver a more effective transition in the context of a phase-out of these products. Information and website advice is important but it is direct engagement that is the effective transition tool.

The Plastic Free Places program currently operating in Noosa, Byron Bay and Perth (Bassendean) is one example of a proven model that engages with hospitality about changing practices. The Noosa program has over 180 café and food outlet members and has

significantly switched practices away from single use plastics. Further info is available: www.plasticfreenoosa.org

A continuous improvement approach can be applied so that once behaviour changes have been achieved on the above, a next tranche of problem plastics could be considered.

Plastic Pollution Reduction Strategy

One means that the WA Government could consider is the establishment of a Plastic Pollution Reduction Strategy (PPRS). The government has addressed lightweight plastic bags and is introducing a container deposit scheme. The next most obvious step is expanding the bag ban and addressing takeaway plastics as outlined above. However, the issues around single-use plastics are far broader than these.

A PPRS strategy would provide a policy framework for action to address all problematic single-use plastics. Given the ubiquitous nature of single use plastics, a continuous improvement approach to policy could be adopted.

The Queensland Government has introduced a Plastic Pollution Reduction Strategy and framed this around five action pillars-single-use plastics; in the home, away from home, in agriculture, in business and industry and in the marine environment.

This frame picks up most of the target plastics and engages key industry, academic and community representatives. There is virtually unanimous support for reducing plastic waste across sectors, so the framework acts to harness and encourage policy and practice to reduce the problems.

Conclusions

The Boomerang Alliance welcomes this Issues Paper and recommends that the WA Government take the opportunity to introduce policies to address single use plastics. Already the State has made a difference by banning lightweight bags and introducing a container refund scheme.

The next step should be to extend the bag ban to thicker bags, ban the use of polystyrene food ware, and phase-out single-use takeaway plastic items. Takeaway food ware that is certified 100% compostable should be permitted. We stress that further work will be required to ensure that where compostable products are used that accompanying effective collection and composting services should be established.

When it comes to away from home catering, reusable food ware is the best option.

Response to Specific questions

Do you support reducing single use plastics? Yes

How concerned about listed products. Very concerned. As outlined all single-use plastics represent a potential problem for the environment. All matters of concern listed can be addressed through the same policy of eliminating their use in favour of readily available alternatives.

Plastic priorities. Those listed all represent a problem in some form. Lightweight plastic bags are banned, container deposits set to be introduced and a voluntary ban on plastic microbeads. WA should phase-out identified single use plastic takeaway next and then, through continuous improvement, address the remaining items as opportunities present

Options to reduce plastic items. As outlined above. In addition, the WA Government should support the strengthening of the national Product Stewardship Act to include packaging. Currently, consumers, local authorities and recyclers are expected to recover discarded packaging and pay the costs. The Product Stewardship Act should include manufacturers and suppliers and require them to apply eco-design principles to the products they provide. This would mean eliminating toxic materials, reducing required resources for manufacture and providing packaging designed for easy, convenient and cost-effective reuse, composting or recycling. These requirements need to be mandatory. This is consistent with the NWP targets for 2025. Strengthening the PS Act in this way and delivering the target will inevitably mean the strategic application of all these listed options.

Behaviour and practice change is most effective when products are managed through their whole lifecycle and policy options are made with reference to that lifecycle, rather than choosing specific elements.

Should you require further information or explanation of our comments, please contact Boomerang Alliance.

Signed



Jeff Angel
Director



Toby Hutcheon
QLD Manager

Thanks Sue for the email and for taking time to address this issue. Unfortunately Keith and I cannot attend the meeting. We would be grateful if you could register our apologies as we would have like to attend. We look forward to hearing what is discussed.

Trish and Keith Howe
[REDACTED]

Johnny Prefumo [REDACTED]
Wed 22/05/2019 1:56 PM

Hi Sue,

We're meeting up with Joanne prior to her presentation but please send my apologies.
Johnny

[Jan Rodda](#) Plse give my apologies. Plastic will continue to be produced while oil and coal are mined. Needs nipping in the bud, at source.. not just at the waste/symptom end.

[Kerry Lee](#) I've registered

[Carol Morgan](#) Wontbe here but would have attended if we were. Keen to send it on.

[Penelope Elliott](#) Can't go, have a music rehearsal. Can't share post Sue. Will find Herald try & register.

Jill THOMPSON-WHITE [REDACTED]

Thanks Sue.

I've got a dinner at friends' house that night, but I will spread the word! Good on you.

Hi Sue,

Thanks for doing this. I can't make it but would definitely appreciate being an apology.

Regards, marilyn

Dr Marilyn Palmer,
Lecturer, Social Work Program,
School of Arts and Humanities
Edith Cowan University
Robertson Drive, Bunbury WA 6230
[REDACTED]

Hahah thanks sue!! It's ok, good on you for spreading the word!

City of Bunbury Function Room. Oh bother, there's always some crucial I forget to mention! I need an editor! X

From: Jada Email [REDACTED]

Hi sue!! That sounds amazing and much needed!

I will try to make if I can, where is it being held?

However, I may be going to visit my nanny as she is unwell, if I cannot make it I'd be happy for you to send them my apologies and email address!

Awesome work sue!

Jada.

Robin Shine
Penny Elliott
Jan Rodda
Sue Collins
Rosina Mogg

Kerry Bemrose

[REDACTED]
Unwell, sends apologies and hopes for follow-up.

Maggie Ward

[REDACTED]
Thu 23/05/2019 5:12 PM

Hi Sue

Thanks for the notice of meeting--just received it.

We have been away a few days.

Please put in my apologies.

Maggie W

John Collins

[REDACTED]
Thu 23/05/2019 10:58 AM Thanks for the invitation, Sue.

Please present my apology.

I've always been an active "picker-rupper" of rubbish wherever I go!

Regards

John

Jane Putland

[REDACTED]
Wed 22/05/2019 8:27 PM

Sue, we will be coming if they let us register tomorrow, tried registering on line but said no places remaining.

regards

Jane

John Collingridge

[REDACTED]
Wed 22/05/2019 1:22 PM

Hello Sue,

I have 2 engagements tomorrow evening. You can communicate to the meeting, if appropriate, that I am strongly in favour of minimising plastic waste getting into the environment within the City boundaries and urge the Council to strongly pursue practices that will reduce plastic waste. Clients of fast food outlets are the worst offenders: in Ireland one of the city's threatened to put a litter levy on fast food outlets. The fast food outlets countered by "recruiting" their own clients to get around the city and pick up litter.....similar pressure should be put on fast food outlets here: McDonalds, Hungry Jacks, Kentucky Fried Chicken, & the one that does the long filled rolls (name escapes me)...I see litter from these outlets all the time.

Kind regards,

John

Don Reid

[REDACTED]
Wed 22/05/2019 12:43 PM Thanks Sue – I will be there but only in spirit, having another engagement set up already at that same time!

Don

Doug Shrimpton

[REDACTED]
Wed 22/05/2019 6:47 PM

Hi Sue

Sorry I'm working at a function at Grammar tomorrow night, will you give our apologies, thanks

Doug

Phil Smith

[REDACTED]
Wed 22/05/2019 3:43 PM

Thanks for this Sue. My apologies please. Phil Smith.

From: Sue Kalab [REDACTED]
Sent: Wednesday, 22 May 2019 9:19 AM
Subject: fight against plastic waste tmrw night.meeting with City of Bunbury

Spread the word please. City of Bunbury is holding a workshop this Thursday 23rd May 6 - 8 pm re "fight against plastic waste", and are looking for ideas from the community. See P.7 Bunbury Herald 21/5.

This is a gi-normous issue that needs addressing. We all grumble at having to attend such things, but often good things come out of doing so, and one spin-off is that you meet like-minded peeps. While we are on this beautiful planet we have to act together in the spirit of collective consciousness and responsibility.

I am willing to take apologies if you simply cannot come so there is evidence this initiative is supported, and that you'd like your name to be added to endorse this. Come if you can, even if you don't live in the City of Bunbury as this is likely to have wider, broader possibilities.

My apologies for sending this if it doesn't interest you. Please e-circulate this to any you think would like to know! Written in a dash.

Best wishes, Sue

[REDACTED]

11 July 2019

Reducing single-use plastic
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC
JOONDALUP WA 6919

Via email: plastic-action@dwer.wa.gov.au

To Whom It May Concern

SINGLE-USE PLASTICS ISSUE PAPER (APRIL 2019)

Thank you for the opportunity to provide comment on the Department of Water and Environmental Regulation's (DWER) 'Let's not draw the short straw- reduce single-use plastics – Issues paper – April 2019' (Issues Paper).

The Chamber of Minerals and Energy of Western Australia (CME) is the peak resources sector representative body in Western Australia. CME is funded by member companies responsible for over 90 per cent of the State's mineral and energy production and workforce employment.

CME supports DWER's engagement process to identify the best approach to reduce single-use plastics and the promotion circular economy principles.

The Issues Paper identifies a number of options available to the government to manage single-use plastics, including "introducing legislative instruments, such as state-wide bans or levies". Should such instruments be adopted, CME cautions that the Government must include appropriate exemptions to these instruments, where single-use plastics are required for hygiene and/ or safety purposes.

Within the resources sector there are a number of instances where single-use plastics are required for hygiene and/or safety purposes and hence may be inappropriately captured by broad state-wide bans. These include, but are not limited to, barrier bags in mess facilities for food hygiene purposes and medical or health-related products such as straws for breathalyser mouth pieces and specimen cups for drug and alcohol testing. CME would not support the introduction of state-wide bans or levies being applied to single-use plastics employed for such purposes.

Additionally, any state-wide ban or levy scheme should allow sufficient time for communication of new requirements and transition with appropriate grace-periods prior to financial penalties or other enforcement actions being available. For the recent single-use plastic-bag ban, CME and its members were advised with 37 calendar days' notice that a village mess was to be deemed a "person who sells goods in trade or commerce" and hence a "retailer" for the purposes of the *Environmental Protection (Plastic Bags) Regulations 2018*. This short period of time was problematic and efforts must be made to avoid such issues for any future state-wide ban or levy schemes.

CME does however look forward to ongoing engagement with DWER regarding the development of a framework to reduce the use and impacts of single-use plastics within our state.

Yours sincerely



Robert Carruthers
Director Policy and Advocacy

[REDACTED]

From: Cherie Dawson [REDACTED]
Sent: Friday, 12 April 2019 2:32 PM
To: Info
Subject: Hi re plastics

Follow Up Flag: Follow up
Flag Status: Flagged

Hi it's lovely to hear what you are doing.

I wanted to put forward that if plastic is reduced there has to be an alternative.

I have heard that plastic is able to be used to build better roads and is a much better solution than the methods currently used.

I would recommend exploring different ways plastic can be recycled. There is less trees used when using plastic instead of paper bags and the like.

There is also another alternative. I have been buying organic rubbish bags instead of normal plastic ones as these are bio degradable.

This might be an easier way to stem use of plastic materials.

Whilst on the subject we have a spring from which we draw water. There was talk of charging for this like water rates. We have to use electricity to pump the water so I don't think this is a good idea.

Thank you for your time
Cherie Dawson

ENQUIRIES TO: Anita Marriott [REDACTED]
Sustainability Officer

OUR REF: [REDACTED]



CITY OF VINCENT

7 June 2019

Mike Rowe
Director General
Department of Water and Environmental Regulation
8 Davidson Terrace
JOONDALUP WA 6027

Dear Mike,

CITY OF VINCENT SUBMISSION – LET’S NOT DRAW THE SHORT STRAW ISSUES PAPER

Thank you for the opportunity to make a submission in response to the issues paper *Let’s Not Draw the Short Straw* – reduce single-use plastics. The City of Vincent commends the Western Australian Government for its actions on single use plastics to date. It is also the City’s view that much more needs to be done.

We support state-wide bans on the sale and supply of single-use plastic items that are unnecessary or for which there are sustainable alternatives. These include balloons, drinking straws, disposable serving ware and cutlery, cotton buds with plastic shafts, microbeads, polystyrene, plastic rubbish bags, fruit and vegetable packaging and the thicker plastic bags currently supplied by retailers.

We support the use of other regulatory tools such as levies, extended producer responsibility, labelling and sustainable product design for items that are considered essential (such as barrier packaging for meat and dairy products) or unable to be banned at the state level (such as cigarettes).

Key plastics-related issues for our City are litter and the contamination of municipal recycling and composting waste streams. Like the issues paper, our City’s *Waste Strategy 2018-2023* recognises avoidance as the preferred option for minimising plastic waste. We are playing our part by implementing policies, guidelines and procedures to minimise organisational use of single use plastics and educating and supporting our community to do the same.

However, education and encouragement only go so far. When single-use plastic items are the cheapest, most convenient (and sometimes only) option, expecting consumers to make the “right” choice with each individual purchase is simply not effective. This is perfectly illustrated by the survey of Western Australian households referenced in the issues paper. While more than 90 per cent of respondents expressed concern about the environmental impact of plastic waste, around 50 percent admitted that they did not routinely choose environmentally responsible options.

These findings indicate that regulation of the sale and supply of single-use plastics would receive broad-based support from the Western Australian community, as has been the case for plastic shopping bags and beverage containers.

Administration & Civic Centre

244 Vincent Street, (Cnr Loftus),
Leederville, Western Australia 6007

PO Box 82,
Leederville WA 6902

Tel: (08) 9273 6000
Fax: (08) 9273 6099

Email: mail@vincent.wa.gov.au
www.vincent.wa.gov.au

Thank you once again for the opportunity to comment on this important matter. If you have questions relating to our City's submission, please contact Sustainability Officer Anita Marriott at [REDACTED] or via phone [REDACTED].

Yours sincerely,

[REDACTED]

David MacLennan
CHIEF EXECUTIVE OFFICER

