



Australian  
Retailers  
Association

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Dear Director

### **ACT PLASTIC REDUCTION BILL 2020**

Thank you for an opportunity to provide a submission in response to the draft ACT Plastic Reduction Bill 2020, Explanatory Statement and Updated Next Steps Policy Document.

The Australian Retailers Association (ARA) represents over 7,500 independent and national members and, since 1903, has been the trusted voice for Australia's \$325 billion retail sector, which employs more than 1.2 million people.

The ARA supports efforts to reduce dependence on single-use plastics and is committed to working with the ACT Government to implement measures to reduce the amount of plastic pollution and deliver them according to agreed timelines. However, the ARA believes that an extended timeline should be considered to enable the retail sector to achieve the intent of the proposed legislation.

As you are aware, the coronavirus pandemic (COVID-19) has severely impacted many aspects of the retail sector. Some of our retail members have experienced significant operational disruption, while others have had to temporarily close as a result of the social distancing and travel restrictions. Due to the level of business disruption, uncertainty and cost pressures caused by COVID-19, the ARA recommends that the commencement date of any measures to reduce dependence on single-use plastics be delayed until the impact of COVID-19 on households and businesses subsides. Targeting a longer implementation timeframe will ensure retailers have enough time to adjust their supply chain and source alternative products that are fit-for-purpose, affordable and safe. For this reason we request, at a minimum, a 12 month implementation period from the date of Royal Assent for the first phase of reforms.



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In relation to the broader content of the Next Steps paper, we do have concerns about the proposed phase out of fruit and vegetable barrier bags 12 months after the phase 1 regulatory bans. Significant product development and trials will need to take place between retailers and their suppliers to identify appropriate alternate products that meet both health and safety, as well as environmental, standards. Given the current COVID-19 challenges, coordinating new product development across the supply chain is far more challenging. We believe further discussion needs to take place between the ACT Government, suppliers and retailers about alternative products options and development timeframes for barrier bags.

Lastly, the ARA strongly encourages the ACT Government to adopt a coordinated and consistent approach with other state and territory governments across Australia to reduce dependence on single-use plastics. Harmonisation with other States and territories will make it easier for businesses to comply with any new measures and ensure that retailers who operate in ACT are not subject to a competitive disadvantage in comparison to other interstate retailers. Greater national consistency will also minimise costs associated with transitioning to alternative materials and therefore, reduce the flow on cost impact to consumers.

Thank you again for the opportunity to provide a submission in response to your paper. If you would like to discuss any of the content of this submission further, please do not hesitate to contact Fleur Brown on 0419 270 863 on at [fleur.brown@retail.org.au](mailto:fleur.brown@retail.org.au).

Yours faithfully

**Paul Zahra**  
Chief Executive Officer