



Australian Packaging Covenant Organisation

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Australian Packaging Covenant Organisation submission

Phasing out single-use plastics Discussion paper

1. Executive Summary

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

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APCO welcomes the ACT Government's initiative to address the environmental impacts of single-use plastics and we look forward to working with and supporting the ACT Government to reduce use of single use plastic packaging. In this submission, APCO has sought to address those sections or themes of the discussion 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 ACT Government.

2. APCO's projects on single use plastics

APCO acknowledges the support that the ACT Government has shown for APCO's work, including through the involvement of ACT NoWaste in the APCO Working Groups that oversee APCO's priority projects, and the recognition provided through the Discussion 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 ACT 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.



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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 Discussion Paper outlines several problems associated with single use plastics, including the environmental impacts of litter, the increasing loss of non-renewable resources from productive use, and contamination of recycling streams. 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 Discussion Paper, existing programs such as Boomerang Alliance's Plastic Free Places program 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 ACT 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.



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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 ACT's recognition, evident throughout the discussion 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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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 ACT government how the promotion of this program to consumers in the ACT could help to reduce contamination rates in the ACT's recycling streams.

3.6 Recognise and support industry leadership

The ACT 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 ACT'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 the ACT. 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 ACT 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.