



Further Submission to:

Environment and Communications Committee - Inquiry into waste reduction and recycling policies

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Opening Statement

Thank you for the opportunity to appear.

We are becoming increasingly concerned that the Commonwealth is taking the path of failure on the circular economy and in particular on four current, critical issues. While the funding for reprocessing plants is welcome - that is just one part of the challenge. Grand statements and webpages are one thing - actual specific implementation along the entire life cycle is another - and the real test.

We don't know if the apparent backtracking is a loss of commitment by the Environment Minister or push back by what is increasingly being seen as a timid department - or both.

The four current areas of concern are:

1. In 2021, the Commonwealth released its **Plastic Plan**, which included important bans of several single use plastic items including:

- *Phase out non compostable plastic packaging products containing additive fragmentable technology that do not meet relevant compostable standards (AS4736-2006, AS5810-2010 and EN13432) (July 2022)*
- *Phase out expanded polystyrene (EPS) in loose fill and moulded consumer packaging (July 2022), and food and beverage containers (December 2022)*
- *Phase out PVC packaging labels (December 2022)¹*

But virtually nothing has been achieved at the national level. We are left with various state bans, with the Commonwealth taking an off-stage position. I am not aware of the current government reactivating its direct involvement here.

2. After the October 2022 Environment Ministers' Meeting they announced 'the development of a regulatory product stewardship scheme **for solar panels and household**

¹ The Australian Government will work with industry to fast-track phase outs of problematic plastic materials, including, expanded polystyrene in certain applications, non-certified compostable packaging, and PVC packaging labels. (p4)

electronics.' In June 2023, good policy proposals for small e-waste items were released for public consultation (*Wired for Change*).

These electronics are dumped in their hundreds of thousands per annum with the average Australian producing 20 kg of e-waste in 2019 compared with the global average of 7 kg. Australia's e-waste generation is projected to rise by nearly 30% by 2030, from 511,000 tonnes in 2019 to 657,000 tonnes.

But as you know, the focus on the smaller items was dropped, to just work on solar panels.

3. **On batteries**, the Commonwealth has clearly given up as a leader and key states, in particular NSW, Qld and Victoria, rebelled and they are now urgently developing a response to an emergency situation, with product responsibility plans by end of year, to combat the fire risk to the entire collection and recycling infrastructure.

Notably it is implicit that the weak, voluntary industry Bcycle scheme, is highly inadequate and should be set aside.

4. **Packaging stewardship** is a big issue, especially after the collapse of REDcycle scheme – another voluntary arrangement.

In June 2023, Environment Ministers agreed to introduce mandatory packaging design obligations based on international best practice and make industry responsible for the packaging they place on the market under a new regulatory scheme.

Consultation on the design component was to occur mid-2024 – that date has passed without them appearing – and the new regulation would take effect by the end of 2025.

But will it?

The brief is larger. In July 2023 the Regulatory Reform of Packaging Targeted Consultation Paper was released. It proposed:

“A whole of supply chain approach will consider roles and obligations for all sectors in the packaging supply chain, from design and manufacturing through to collection, sortation, recycling, and reprocessing to ensure cycling of packaging materials through the supply chain”.

We don't see whole of supply chain being actively pursued and it appears the department is backing off.

Targets are being severely compromised. Current 2025 National Packaging Targets are:

- 100% of packaging is reusable, recyclable or compostable
- 70% of plastic packaging goes on to be recycled or composted
- 50% average recycled content within packaging (20% for plastic packaging)

We all know there is a massive fail. Worse it looks like they will be replaced by significantly weaker ones. One guide is the recent APCO goals, in their 2030 plan - both in % terms and dates.

Next, the waste export variation charge / process issue.

I understand there are two main views:

- i) The additional costs for variations in an export permit and the process involved, can create a disincentive to export and could lead to the material being either stockpiled or landfilled, as domestic demand is not sufficient.

and

- ii) It is important to not let the export floodgates open, as the material is needed for the growing domestic circular economy – thus a disincentive is necessary.

In one view, the priority is for domestic reprocessing. On the other hand there may be a constraint placed on an important stage of the material life cycle, that is, collection, sorting and initial reprocessing (eg plastic into flake) in Australia for higher uses - if there is no market and income, for example from export.

Growing the domestic demand for recycle is crucial. Quality and traceability are easier in Australia than overseas. I would urge the Committee to devise a way to monitor the domestic requirements so that when the material is needed – there is no impediment to contracting it, in time or cost. We certainly don't want to be in the situation of having to import the recycle. This could mean having a regulation that is quickly reactive to domestic needs.

Finally -- our submission called for two broad reforms:

- A. Establish a nationally consistent Circular Economy policy framework that must be adopted by all States and Territories through regulation. This should be based upon the principles identified by the Commonwealth Government Circular Economy Taskforce.
- B. Make all product stewardship schemes mandatory with outcomes and targets and ensure that producers/ suppliers of products are required to take full responsibility for their products through their entire lifecycle.

Review all current product stewardship policies and practices, and matters regarding waste exports of plastics, glass, tyres, and paper to confirm they comply with the principles of a circular economy (as identified by the Commonwealth CE Taskforce) and are subject to mandatory product stewardship scheme outcomes.

Commonwealth policies and practices must be supported with State and Territory policies such as bans on particular products and landfill disposal, and the promotion of reuse of resources.