

BEST PRACTICE
EXTENDED PRODUCER RESPONSIBILITY SCHEME FOR PACKAGING

BOOMERANG ALLIANCE

> **Businesses producing or selling packaging have a responsibility beyond the design and use of their packaging, which includes contributing towards it being collected and reused, recycled or composted in practice.**
> *New Plastic Economy, Ellen MacArthur Foundation*

The Commonwealth Government has committed to reform packaging. To ensure effective reform, the Boomerang Alliance is urging the Government to introduce mandatory Extended Producer Responsibility (EPR). We have developed model guidelines for a best practice EPR scheme.
These guidelines include all packaging and circular economy arrangements associated with that packaging, supported by the following principles:

1. **Prioritisation of avoidance and reduction:** Manufacturers must avoid and reduce all unnecessary packaging and harmful materials. One single use material should not become a replacement for another single use material and the scheme must facilitate national collaboration to accelerate 'refill & reuse'.

2. **Best Practice Sustainable Design (ESD) of Packaging (#1 Circular Economy Principle):** Best practice design includes the elimination of packaging items and materials that cannot be recovered and maximising the use of safe recycled content in new products.

3. **Mandated Standards:** All packaging will be designed for circularity and based upon its highest resource recovery value. Mandated standards include the requirement that materials are recovered in practice and at scale (not just 'technically recyclable'). Only packaging items tested to a standard can be labelled as such.

4. **Extended Producer Responsibility (EPR) Whole of Life Cycle and Supply Chain:** EPR covers producer responsibility across the entire life cycle – from design to the costs associated with the collection, transport, processing and recovery of all packaging. Mandatory membership means all manufacturers and suppliers are included to ensure a level playing field. Eco-modulated producer fees need to be considered to incentivise preferred options.

5. **Mandatory National Targets and Obligations:** Targets should be set based on current National Waste Plan (NWP) targets. In addition, a 20% plastic reduction and a 30% reusable target by 2030 should be included.

6 **Development of secondary markets.** Existing recycled content targets will be applied and expanded to ensure the highest possible resource value outcomes. Specific packaging categories will be prioritised with specific targets. Incineration is not supported as it hinders the transition to a circular economy. Exports for offshore recycling is not considered a secondary market option.

7 **A national scheme managed under Commonwealth legislation.** The new mandatory scheme must be governed by a national body with authority to implement, monitor and enforce targets. Its Board must be accountable to the Commonwealth Government, not industry. Legislation must be designed to create a level playing field and avoid 'free riding'.

8 **A standardised monitoring, compliance and enforcement regime.** This regime should be established to meet government policy obligations and for all producers, ensuring public accountability and performance outcomes. Significant and proportionate financial penalties will be applied for noncompliance and greenwashing to act as effective deterrents.

9 **Commitment to continuous improvement.** A commitment to continuous improvement includes regular updated lifecycle analysis of product and supply chains, adoption of best practice and integration of latest and emerging technologies to improve upon current practices. Continuous improvement takes account of associated impacts on human health and wellbeing, carbon footprint, job creation and the effects of plastic pollution on other industries and the environment.

10 **Consumer education, awareness and behaviour change.** Consumers must be informed about best practices to reduce unnecessary packaging and the potential impacts of packaging prior to purchase. Individuals and businesses need to know how to best discard any packaging according to its category. Producers must enable consumers to 'close the loop' by providing easy access to fit-for-purpose collection services for all packaging types.

The below packaging wheel shows the actions required to achieve a best practice circular economy for packaging. It places producer responsibility at the centre, however stresses the need for a long term, bold and collaborative strategy addressing improvements required across all levels of the supply chain. The term 'consumers' refers to everyone who procures packaging, including individuals, businesses, organisations and governments.

