

'All Australian Governments have endorsed a target to have all plastic packaging reusable, compostable or recyclable by 2025. Of these options, reuse is the preferred and most environmentally responsible option.' *Boomerang Alliance*

Brief on Refillables and Reusables

When it comes to addressing single use plastics, avoidance and then reuse are the best and preferred options. Reusing packaging and containers is becoming an increasingly popular option for many consumers and businesses. However, there remains a number of challenges and impediments to greater adoption of reusable containers.

Most people are now aware of the options of BYO coffee cups as an alternative to single use takeaway options. There are now reusable coffee cup networks emerging, one example is *Green Caffeen* <https://greencaffeen.com.au> that offer a take-back arrangement shared by a whole network of cafes and food outlets that allows returns to any participating outlet. Some networks also include takeaway containers in this arrangement.

At public events and festivals, a growing number of progressive events are utilising reusable cups for their bars. This can dramatically reduce single use plastics going to landfill. One example, *Globelet* <https://www.globelet.com> offers a reusable wine and beer/soft drink cup that can be repeatedly used, stored and reused at future events.

There are also options for events to provide crockery and reusable cutlery for their vendors, these can be washed up and used repeatedly.

This brief seeks to promote a few ideas and examples that could be implemented in communities or events or by individuals to increase the uptake and make reusable packaging options more common practice.

It is framed for interested government decision-makers and organisations active in this space to provide some strategic direction about how refillable/returnable options could be further promoted and introduced.

Background

The *Reuse Rethinking Packaging* handbook by the Ellen Macarthur Foundation outlines four main options for reuse. These being refill at home or on the go or return from home or on the go. To summarise, that essentially means having BYO containers for food or drink that you use at home, at a shop, food outlet, supermarket or public event OR the option, provided by a third party, that allows you to use and then return a container or cup.

Having and using your own BYO water bottle is one example of the former and utilising a service like *Green Cafen* or *Globelet* an example of the latter.

A container deposit system is an example of a return scheme. Whilst it is predominantly used to collect for recycling, it could also be used to collect refillable containers.

Reuse can...



Extract from *Reuse Rethinking Packaging* -Ellen MacArthur Foundation

Legal Situation

Advice we have received clarifies the legal situation with respect to reusables. Matters relating to packaging are contained in the Food Standards code under the Food Act (2006). This code spells out the obligations for businesses that provide food products to their customers. Amongst other things, it requires that a food business must *only use packaging material that is fit for its intended use, will not contaminate food, ensure food is protected from contamination during all stages and must not re-use single use items.*

When it comes to consumers bringing their own container, there is nothing in the legislation that prevents consumers making this request of a food business. However, it is a food business decision whether they allow this practice as they *must be able to demonstrate that the container was suitable for use, clean and sanitised so as to not contaminate the food and assure themselves that the item is not single-use.*

(For your information the full transcript of this advice is attached at the bottom of this document. It is for reference only and does not represent formal legal advice)

Promoting More Refillable/Returnable Options

The first strategic option would require a review and change to the Food Act to allow (or even require) businesses to provide reusable containers to their customers, when requested. It is likely to be very difficult and time-consuming to take this type of action. Because of these challenges, this brief does propose nor canvass a process or details about changing the law on reusable packaging for food.

The second option would be to identify examples and ideas that could be implemented, under current legislation and food safety standards. For the purposes of this brief, we have identified situations in which reusable food ware could be promoted by our organisations and become more common practice, whilst meeting the requirements of current legislation.

Scenarios

We have focused on four scenarios that represent more obvious opportunities. These are:

- At events
- At takeaway outlets
- At supermarkets/retail
- At specific controlled environments (e.g. university campuses, corporate buildings, government offices, institutions such as Parliament House, museums and art galleries, and sports grounds etc)

Events

Public events and markets are managed, usually by a central organiser. This enables an opportunity to introduce reusables. Examples include:

- Refillable cups for bars and reusable coffee/tea cups at the event
- Vendors accepting BYO containers from consumers
- Events providing reusable food ware for the use of all vendors

Takeaway Outlets

Outlets generally serve food and drink in single-use plastics or compostable packaging. Alternative options could include:

- Permitting customers to bring BYO containers
- Offering a container take-back service for their food services

Supermarkets/Retail

Many consumers would like an option that would allow them to use reusable containers for fresh food products. Other retail outlets such as some home and personal care locations, bulk buying outlets and retailers such as Biome already offer reusable container options, and provide good examples of this practice. Options could include:

- Use of BYO produce (usually string bags) or for these for sale by retailer
- Permitting customers to use BYO container for delicatessen/meat and other putrescible products
- Provide a take-back container service for their customers for fresh food

Specific Controlled Environments

Controlled environments provide opportunity to manage any reusable systems more effectively as any networks tend to be isolated and separate. For example, it is easier to manage vendors and transactions within a campus or office block, than at a more public retail precinct. The UQ Unwrapped program is currently exploring some of these initiatives. Options include:

- Reusable cup and container services for the whole site or location
- Container take-back systems provided by vendors
- Public and institutional events and markets providing reusable service and networks.

Cost Benefits

Apart from the benefits of less litter and waste, reusables also mean reduced fossil fuels being used to manufacture single use plastics.

Vendors can also save by avoiding the costs of continually purchasing throwaway plastics. Every customer who provides a BYO cup, saves the business money. Whilst investing in a refillable cup or containers service at an event or market or as part of normal business does have initial cost to set up. It will end up as a cheaper option through avoiding single-use plastic replacements.

Plastic Free Places

As an example, our Plastic Free Places (PFP) program (www.plasticfreeplaces.org) has implemented the following initiatives in a number of PFP communities.

1. Water Refill Stations- Establishing the TAP network

One of the key items we aim to eliminate from food retailers is plastic water bottles. These are often difficult to eliminate because businesses, particularly those in tourist areas, make a lot of money from selling them.

In order to make a case to eliminate them from these businesses, we need to create a viable alternative for them.

We have created a stage-based model to provide this viable alternative. In brief, the model is:

1. Create a system of refill points (local businesses, water stations) which identify locations where consumers can refill water bottles. Points are identified through signage/stickers and can be located on an interactive map/ app ([TAP](#))
2. Bulk buy 'Noosa' branded water bottles which are made available cheaply to participating businesses to on sell for a profit.
3. Increase the number of street water stations.

PFN has established this on the Sunshine Coast and we have set up 58 cafes to date as part of the TAP network, as well as inputted a further 42 Council water stations.

An extension of this program is for hotels to provide reusable bottles for guests to borrow (or keep for a charge) with instructions on utilising the network. A trial was run at Peppers Resorts Noosa with guests completing a questionnaire after their stay. Guests did utilise the bottle and network, with an overwhelmingly positive result.

2. Borrow Bags

A reusable bag that is given to hotel guests to borrow using their stay. Operates under the same principle as the water bottle initiative above.

3. Reusable Cup & Container Networks

There are now a number of cup and container sharing programs. Perhaps the best known in Qld are Green Caffein (<https://greencaffein.com.au>) and Returnr (<https://returnr.org>). These systems involve cafes in an area signing to the network, which provides them with reusable coffee cups and/or containers. Customers can access these cups/containers and return them to any café in the network.

4. Refillables/Reusables at events

Many events (Woodford Festival, Caloundra Festival, North Stradbroke Festival, Noosa Food and Wine Festival, QLD Parliament are local examples) have used refillable cups for alcohol, soft drinks and water. The system involves attendees being provided with a refillable (reusable plastic) cup on entry. This could be for a refundable charge (recommended) or for free. No drinks provided from event bars can be served without attendees presenting their refillable cup. These can be replaced with clean ones should the attendee prefer.

The best-known system is: <https://www.globelet.com>

Smaller events can also implement a coffee cup/food ware sharing system. This would be particularly applicable at markets and school fetes or community events. At the event vendors provide food and drink in

reusable food ware provided by organisers. The food ware is returned to a clean-up point on site, washed and then reused by vendors.

How it could work:

Community group/event/commercial operator keeps the equipment which includes all the cutlery/crockery, the tables, urns, buckets, washing up liquid etc. This would need to be stored when not in use. Likely there would be an upper limit on event size due to the impracticality of storing thousands of items. Hiring of items is also a possibility.

- They set a fee for the use of this service to the event organiser/vendor who would likely be scaled up depending on the size of the event and the number of wash up stations required.
- The fee can be somewhat offset if the event agrees for an NGO/charity to be the beneficiaries of all beverage containers collected on the day.
- The NGO provides washing up services and could additionally take gold coin donations from the public for the washing up station.
- Council can help promote this initiative as it reduces waste and supports council waste reduction policies/costs
- The event (or their vendors) will also save money through reduced need for disposable items (an average coffee cup with lid costs 10 cents each) plus they will pay less for their waste.

5. International and some other examples

The *Reuse Rethinking Packaging* handbook offers many other examples to the ones referenced above. They include soda stream, Loop returnable containers, Returnr (mentioned in PFN section) and even Coke Brazils system of using a universal returnable bottle. Another example is Waitrose, a UK supermarket chain, who have introduced a refill service. Some supermarkets even provide a take-back container service from their delicatessen.



When it comes to returnables, the introduction of a container deposit scheme for beverage containers also opens up opportunities. Future collection could be expanded to include other products, both recyclable and refillable. In Germany, their container deposit scheme includes the collection of refillable bottles. It is estimated that over 50% of beverage bottles in Germany are refillables, with these being refilled an average 50 times.

The *Reuse Rethinking Packaging* handbook provides details of 69 refill/return/reusable examples from around the world. <https://www.ellenmacarthurfoundation.org/publications/reuse>

More information: <https://trashlesstakeaway.com.au>

Appendix

Advice received about food safety regulations regarding the use of reusable (BYO) containers at takeaway outlets or supermarkets

The *Food Act 2006* (the Food Act) is the primary piece of food safety legislation in Queensland. It gives effect to the *Australia New Zealand Food Standards Code* (the Food Standards Code). It is designed to ensure food for sale is safe and suitable for human consumption, to prevent misleading conduct in relation to the sale of food and to apply the Food Standards Code.

Standards within the Food Standards Code are developed by Food Standards Australia New Zealand (FSANZ), a statutory authority in the Australian Government Health portfolio using evidence based, scientific risk assessment.

The Food Act applies national food safety requirements to food businesses in Queensland and provides for regulatory oversight and risk management via licensing and food safety program provisions. All food businesses in Queensland are required to comply with the requirements of the Food Act and Food Standards Code, irrespective if they are considered licensable under the Food Act or not.

Chapter 3 of the Food Standards Code is the *Food Safety Standards*. These standards outline food businesses requirements in relation to food safety practices, general requirements, food premises and equipment. These are outcome based standards meaning it is the food businesses responsibility to demonstrate how they meet the requirements. Amongst other things, a food business must only use packaging material that is fit for its intended use, will not contaminate food, ensure food is protected from contamination during all stages and must not re-use single use items.

Anyone can apply to FSANZ to amend the Food Standards Code. Further information on making application can be accessed on the FSANZ website at <http://www.foodstandards.gov.au/code/changes/Pages/default.aspx>

In terms of consumers bringing their own container for use at a food business, there is nothing in the legislation that prevents consumers making this request of a food business. However, it is a food business decision whether they allow this practice as they must be able to demonstrate that the container was suitable for use, clean and sanitised so as to not contaminate the food and assure themselves that the item is not single use (therefore depending on the type of cup used at a festival it may not be allowed to be re-used).

The Department is aware that the large supermarket chains do not allow customers to supply their own containers, particularly for use in the deli area for a number of reasons including that the use of a wide variety of containers impacts on the tare weighting of their scales, increasing the cost to their business to have them recalibrated more frequently, they cannot guarantee the cleanliness of the container and they do not have capacity to clean and sanitise each container prior to use. These reasons are in addition to feedback that customers often bring containers designed for single use (eg take-away container) which the food business is prevented from using as it is not the intended use.