

Submission Guide:

NSW Government Plastics Plan

May 2020

The NSW government is seeking feedback on its plastics plan and discussion paper *Cleaning up our act: redirecting the future of plastic in NSW*, before May 8. This guide outlines the NSW Greens position on plastic waste so that you can have your say on how the government should address the environmental disaster created by plastic pollution.

New South Wales is at a critical point in an urgent waste crisis of our own making with plastic waste seeping into our waterways and soil, and landfills reaching capacity.

The impact of plastic waste on our environment is immense with the CSIRO estimating that there are 358 million pieces of plastic litter along our national coastline and 35 billion pieces of plastic floating in Australian waters. This does not include microplastics and microfibres that we are only just starting to recognise as being probably one of the most widespread forms of plastic pollution.

NSW is well behind the rest of the country and the world in its approach to plastic waste. We remain the only state to have not legislated a ban on single-use plastic shopping bags. Meanwhile, the European Union has moved to phase out single-use plastics by 2021.

It is absolutely crucial for the protection of human health and our environment that we phase out single-use plastics. According to the 2019 Clean Up Australia Report (NSW), 37% of all litter was plastic. With plastic takeaway items and food packaging the most littered items (after cigarette butts).

The target laid out in the discussion paper is simply the phasing out of single-use plastic bags which the government is 'considering doing within 6 months' and the phasing out of other single-use plastics at an undisclosed time.

Reduce plastic waste generation

Priority direction 1: Harness people power to create a fundamental shift in the way we use plastic

Plastic is so ubiquitous that it is impossible to avoid. Even as awareness of the impacts of plastic is growing, as are movements such as ‘zero waste’ and the ‘war on waste’, reducing plastic consumption remains difficult for most people.

A recent IPSOS poll (IPSOS ‘Throwaway World’ poll 2019) shows that three out of four Australians would prefer to purchase a product that uses as little packaging as possible and 69% support a ban on single-use plastics.

Businesses and individuals that seek to actively avoid plastics are often operating against market forces that encourage the use of plastic and must go to great lengths and expense to avoid it. One example is the inability to use your own containers at a supermarket or deli, being forced to use single-use plastic containers.

Consumer education campaigns should complement the regulatory changes and changing social expectations around waste, and better inform choices around the benefits of reducing, reusing and recycling their waste.

Priority direction 2: Set design standards for plastic consumer items

The introduction of mandatory design standards is necessary to encourage businesses to move away from using virgin and excessive plastic in their product design and to enhance the overall recyclability of plastic.

Packaging should be subject to the targets set in the National Waste Strategy and the position endorsed by all State and Territory Governments (including NSW) that all packaging must be reusable, compostable or recyclable by 2025.

Mandatory design standards should be set for the following materials and products:

- PET products should be required to have a minimum rPET content, with a target of 70% by 2022.
- **Small Format:** items smaller than 4-7cm including lids, sachets, individual wrapping, tear off seals etc should require design standards that eliminate these tiny, low value and unrecyclable pieces of plastic being separated from the main product or shift to reusable delivery modes e.g. sauce dispensers instead of sauce packets.

- **Multi-Material:** packaging with inseparable layers of different materials eg. foil wrappers, tetra packs.
- **Uncommon Materials:** like expanded polystyrene and polystyrene should be replaced with more common and recyclable plastic such as PET
- **Nutrient Contaminated:** food contaminated plastics (eg. takeaway containers) should be made with compostable plastic in conjunction with scaled-up composting infrastructure.
 - To complement the increase in uptake of compostable plastic and composting infrastructure in Australia, compostable packaging and other items should be clearly labelled with Australian Standard 'compostable' or 'home compostable' to clarify how to dispose of the item.
- Detergents, personal wash products, cosmetics, tea bags, fertilisers and other products that contain microfibres and microplastics - ingredients and components containing plastic should be replaced.
- Cigarette filters which easily leak into the environment due to their size and contain chemicals that can kill plants, insects, rodents, fungus and other lifeforms. Filters should be chemical-free and compostable.

In addition:

- Mandate clear and standard labelling for products detailing their recycled content, recycle instructions, and plastic content including microplastics/microfibres.
- Use transparent or lightly tinted plastic pigments and phase out carbon black pigment. This will increase the recyclability of plastics like PET. Carbon black cannot be detected by most infrared sorting machines and so goes into landfill.
- Phase-out unnecessary and toxic additives, adhesives and inks that hinder recyclability.
- Where plastic is combined with other materials eg. metal, it should be redesigned to be easily taken apart to enhance recyclability or replaced.
- Introduce a method for tracking the number of times a reusable container or bag has been used, such as barcode or QR code, which could be part of a loyalty system with incentives.

Priority direction 3: Phase out key single-use plastic items

NSW is the only Australian state that has yet to phase out plastic bags, Woolworths and Coles have already phased out single-use bags of their own accord. A ban on lightweight plastic bags in NSW is well overdue and in line with community expectations.

Heavier and boutique plastic bags are easily available and cheap, often costing less than 50 cents, yet they are effectively no different to lighter weight plastic bags. Because of this they pose the same environmental and economic issues as lightweight plastic bags whilst requiring more resources to produce and longer to breakdown. In order to have a net positive impact on plastic pollution, a single heavyweight bag would need to be used hundreds of times.

South Australia, the ACT and Queensland are working towards phasing out certain single-use plastics including plastic straws, stirrers, cutlery, cups, bowls and plates and include polystyrene and oxo-degradable food ware.

The NSW Government should phase out all single-use plastics by 2023. Immediately banning easily replaceable products including plastic bags, polystyrene food and drink containers, plastic straws and microbeads. Other products should be progressively phased out through regulatory measures, procurement programs and innovation.

Alternative products that could be provided include reusable food ware and non-plastic alternatives such as wood, cardboard or sugarcane as well as compostable products that comply with the Australian compost standard (AS 4736/AS 5810).

Any ban of plastic straws should ensure businesses continue to provide people with a disability who require a straw to drink through a suitable alternative such as metal, paper or other. Plastic products should also be made available via registered pharmacies and health services for those with special needs where no safe practicable alternative is available.

We support the Total Environment Centre's recommendation that the government establish a special task force to examine and propose the best policy solution to cigarette butt littering and for that task force to present its findings by 2021.

Make the most of our plastic resources

Priority direction 4: Make producers of plastic items more responsible for collecting and recycling in NSW

Business must be held responsible for the production and sale of plastic packaging for the entirety of its life cycle by ensuring that plastic packaging is collected, reused, recycled or composted.

The Greens support the Boomerang Alliance and WWF-Australia position (March 2020) calling for packaging product stewardship and labelling:

'Mandate Australia's National Packaging Targets within the Product Stewardship Act 2011. Stronger regulations on packaging is a prerequisite for any effective policies to avoid, reduce, reuse or recycle plastics. There will be no effective packaging redesign or resource recovery without comprehensively improved management and mandated, time-bound targets for recovery.

Immediately address packaging labelling and greenwashing through;

- a. Mandating the Australasian Recycling Label (ARL) to all product packaging,*

- b. Expanding the ARL to include reusable and compostable packaging,*
- c. Requiring a condition that to use the ARL, all packaging labelled as reusable, compostable or recyclable is reused, composted or recycled in practice and at scale.'*

Priority direction 5: Mandate 30% minimum recycled content in plastic packaging in NSW by 2025

A 30% recycling rate in 10 years is not good enough. Australia and NSW have an opportunity to invest in its onshore recycling capabilities, which have been severely weakened. This will create new jobs, boost the market value of recycled goods and create a secure and resilient domestic waste industry which is particularly pertinent in the wake of the Covid-19 pandemic. For these reasons and more NSW should set far more ambitious targets.

The Greens believe NSW should adopt the Australian Packaging Covenant Organisation's (APCO) target of a rate of 30% recycled content included in packaging by 2025.

Priority direction 6: Support demand and industry capacity

Businesses continue to use plastics for their products because it represents the most economic choice on the market, however, the economic and environmental costs of plastic pollution and the carbon emissions used to produce plastics far outweigh the short term benefits.

The NSW government should support businesses to transition away from single-use plastic by introducing:

- Mandatory labelling of the plastic content of products
- A Product Stewardship scheme for packaging with mandatory recovery targets
- Subsidies and incentives for businesses that reduce their plastic waste
- Infrastructure for easily accessible alternatives
- Safe alternatives to single-use plastics for people with a disability where they exist
- Measures of success
- Penalties for businesses that fail to reduce their plastic waste
- Large subsidies for startup companies to produce single-use plastic alternatives

Reduce plastic waste leakage

Priority direction 7: Use extended producer responsibility schemes to fund litter collection and end-of-life plastic management

The Total Environment Centre estimates that it costs governments in NSW over \$167 m per year for litter clean up the majority of which is plastic litter from packaging.

The Greens support extending producer responsibility schemes to fund litter collection and end-of-life plastic management.

The NSW government should also investigate the potential for such schemes to fund LGAs to install stormwater drain filters. This would greatly reduce the amount of plastic litter that ends up in our stormwater systems and consequently our rivers, waterways and oceans.

Priority direction 8: Invest in infrastructure that can better manage plastic before it causes harm

The Government should invest in materials recycling infrastructure and introduce mandated recycled content requirements in order to create a market for recycled plastics.

The Total Environment Centre reports that many LGAs have out of date or inadequate Materials Recycling Facilities as well as a lack of commercial or community composting facilities. LGAs offer different collection services because of this varied capacity.

Upgrading the capacity of LGAs to collect and recover plastics will allow LGAs to offer consistent services across NSW and increase the effectiveness of public education campaigns.

Priority direction 9: Set up a NSW plastics research network by 2021

Plastic pollution is one of the greatest threats to our environment. A report from the Ellen MacArthur Foundation found that by 2050 plastic in the oceans will outweigh fish the equivalent to dumping the contents of one truck of garbage into the ocean every minute.

The Greens support and encourage the formation of a NSW plastics research network to develop our knowledge on the impacts of plastic pollution on our environment and human health and improve our capacity to reduce or eliminate these impacts.

Priority direction 10: Support commercialisation of research-driven plastics solutions

Government intervention is required to help businesses and consumers use less plastic. The more plastic use is discouraged and replaced with sustainable alternatives at a systemic level, the more accessible using less plastic will become to the community and business.

NSW and Australia lag behind the world in market-driven solutions to avoiding, reducing or developing alternative solutions to single-use plastics. We support the NSW Government developing new and innovative business opportunities in this market.