

Committee Secretary
Senate Standing Committees on Environment and Communications
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Dear Mr Palethorpe,

Thank you for the opportunity to make a submission to the Senate Standing Committees on Environment and Communications' review of the Hazardous Waste (Regulation of Exports and Imports) Amendment Bill 2021 (the Bill).

Introduction

APCO is a not-for-profit organisation established to administer the Australian Packaging Covenant (the Covenant) on behalf of the Australian, State and Territory Governments, and its industry Signatories. The Covenant is part of a compulsory, co-regulatory product stewardship framework established under the National Environment Protection Council Act 1994 and the National Environment Protection (Used Packaging Materials) Measure 2011 (the Used Packaging NEPM) to reduce the harmful impact of packaging on the Australian environment. APCO is unique among product stewardship organisations in that it is directly accountable to the Commonwealth, state and territory environment ministers. APCO reports to ministers annually on the delivery of the Covenant through the National Environment Protection Council.

On 7 March 2021, APCO had 1,545 Members representing around 150 different industry sectors across the packaging supply chain, including packaging manufacturers, brand owners, and retailers, with combined revenue in excess of \$360 billion. As Signatories to the Covenant, APCO's Members have committed to achieving the outcomes of the Covenant.

In 2018, these outcomes were given renewed expression and clarity through the adoption of the 2025 National Packaging Targets (2025 Targets), which are:

- 100% of packaging to be reusable, recyclable or compostable;
- 70% of plastic packaging recycled or composted;
- 50% average recycled content across all packaging, with specific targets for certain material types; and
- Phase out problematic and unnecessary single-use plastic packaging through redesign, innovation or alternative delivery methods.

On 8 November 2019, the 2025 Targets were formally adopted by all governments as part of the National Waste Policy Action Plan.

APCO plays a coordinating strategy-setting and administrative role to drive collaboration throughout the supply chain to meet the 2025 Targets. This is achieved using a Collective Impact Framework. The Collective Impact Framework is set out in ***Our Packaging Future***. This document sets out three outcomes that need to be achieved in order to deliver on the 2025 Targets:

- Packaging designed for circularity.
- Improved collection and recycling systems.
- Expanded markets for used packaging.

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Our Packaging Future further outlines 11 strategies that need to be in place to enable these outcomes.

APCO is also working with Australian and international partners to improve management of plastic through the ANZPAC Plastics Pact (ANZPAC). ANZPAC, covering Australia, New Zealand and Pacific Island nations, is a collaborative solution that brings together key players behind a shared vision of a circular economy for plastic, where plastic never becomes waste or pollution. ANZPAC is the first in the Oceania region and second regional Plastics Pact to become part of the Ellen MacArthur Foundation's global Plastics Pact network, with Pacts in Africa, Europe, Latin America and North America. As a global network, Plastics Pacts are an effective forum to engage corporations, governments and non-governmental organisations to address issues arising from global supply chains for polymers, plastic products and waste. Discussions are already underway among key stakeholders in the Pacific Islands and Australia to plan for the cross regional collection and recovery of plastic waste.

Comments on the draft Rules

APCO welcomes the Australian Government's continuing commitment to improving waste management in Australia. In particular, we welcome the Government's intention to implement amendments to the Basel Convention to strengthen transboundary controls on unsorted plastic wastes and plastic wastes containing hazardous substances, and to strengthen the compliance and enforcement provisions of the Hazardous Waste Act. We support the Bill in its current form, and strongly encourage the Government to appropriately resource their implementation and ongoing administration.

Industry and governments are making considerable investments in the capacity needed to process and reuse waste plastics in Australia. APCO is working with its Members and partners to develop specifications for recycled plastics and to incorporate these materials into packaging and other products. Amendment of the Hazardous Waste Act and effective administration of both the Hazardous Waste Act and the Recycling and Waste Reduction (Export–Waste Plastic) Rules 2021, are needed to ensure certainty of supply for the businesses working to service these markets.

Effective compliance and enforcement of the Hazardous Waste Act and the Recycling and Waste Reduction (Export–Waste Plastic) Rules are also needed to ensure that the work that our Members, Governments, and partner organisations across the supply chain have undertaken in recent years to improve waste outcomes, both in Australia and internationally, is not diminished by unscrupulous operators. The spectre of illegally exported waste plastics undermines public confidence in recycling system and risks harming the reputations of all those involved in the supply chain.

Once again, thank you for the opportunity to provide input to the review of this important legislation.

Yours sincerely,



Brooke Donnelly
Chief Executive Officer