About Genfac Plastics

Genfac Plastics is a 100% proudly Australian owned family business. Since our establishment close to forty years ago we have grown to become the leading manufacturer of high-quality plastic food grade containers and picnic/party ware in Australia. Our company is committed to environmental sustainability and playing an active role in the circular economy. In 2021 Genfac Plastics became a signatory to the Australian Packaging Covenant and since that time we have developed a Sustainable Packaging Strategy that sets objectives that align with the 2025 National Packaging Targets. In 2022 we became the first Australian Packaging Covenant Organisation (APCO) Signatory to gain approval to emboss the Australian Recycling Logo (ARL) on our range of takeaway food containers. This step forward has received industry and stakeholder acclaim - https://www.genfac.com.au/wp-content/uploads/2022/10/221005_MR_Genfac_APCO_ARL_FINAL.pdf. This move also confirms the widespread recyclability of our food takeaway containers, a benchmark that alternative products currently do not fulfil.

Most of our products are made in a state-of-the art manufacturing facility in Melbourne which is largely powered by our own solar farm and the products produced and processes followed support high levels of hygiene and quality outcomes. All products are made using polypropylene (PP / resin code 5) and are recyclable after use (at end-of-life). When available, we use recyclate derived from pre-consumer production waste in our production feedstock. By using polypropylene and generating energy through our solar farm we have made sure that our carbon footprint is minimal in and of itself and superior to most alternative products in the market place. Additionally, we have installed a closed-loop water supply system that eliminates the need to source mains water for product production purposes. All this, we believe demonstrates our commitment to environmental sustainability and our vision to make a positive contribution to the local circular economy.

The markets for polypropylene recyclate are strong and continuing to grow, which in turn is seeing increased investment in the collection and recycling infrastructure for polypropylene. In the current market it is not feasible to source and incorporate post-consumer food grade recycled content in our manufactured products, however with new technologies coming on line, this is expected to be feasible within three to five years.

At Genfac we recognise that plastics have a valuable role to play in a productive and circular economy. Plastics are widely utilised or incorporated in products because they are durable, lightweight, hygienic and affordable. Plastic is often used in food packaging because it has proven to be an effective medium for protecting and preserving goods, delivering high standards of hygiene, whilst also realising numerous circular economy and environmental benefits.

With respect to the Inquiry find below our comments in relation to various aspects of the Terms of Reference.

the effectiveness of Australia's plastics management framework under the National Plastics Plan and related policies to reduce plastic pollution particularly in oceans and waterways

Australia's National Waste Policy, as the centre piece, along with the National Plastics Plan have proven to be a stimulus for positive action in relation to the management of plastics on a number of fronts. However, it should be recognised that these policies and plans are relatively new to the national landscape and at the time of writing will largely not have fulfilled their intended objectives. We believe this is important to keep in mind in terms of developing new and further responses with respect to plastics and pollution.

Fundamentally, in order to effectively tackle the levels of plastics pollution in oceans and waterways we need to shift the mindset and economic models as they relate to plastics and plastics products to one whereby, they are seen as a valuable resource rather a dispensable medium. We believe that plastics, in many cases, through its inherent properties, can generate significant social and environmental benefits, and importantly be retained as a resource within the circular economy. Therefore, the focus should be on smart policy settings and actions that drive economic and industry reform rather that "end-of-pipe" solutions that manage the manifestation of litter and waste.

In order to drive wholistic solutions we believe the Federal Government should, as it has articulated in the National Waste Action Plan Annexure 2022, continue to play a role in driving and supporting the implementation of effective product stewardship solutions and frameworks. This approach can be vital in both "designing out" waste as well as creating a shared responsibility approach to managing these products and materials at end of life to ensure they do not enter the litter stream and/or contribute to pollution in waterways and the ocean.

Since 2020 the Recycling Modernisation Fund (RMF) has provided a much-needed shot in the arm for Australia's resource recovery and recycling industry and as such plays a valuable role in supporting our transition to a more circular economy. Whilst there has been a significant investment through this program to develop plastics recycling capability and infrastructure it is important to note that this does not extend to all product and polymer types. To date there appears to have been a focus on the higher volume and higher value plastics streams. It may therefore be timely to undertake an audit to determine which plastic products and polymer types have a propensity to contribute to pollution and would benefit from being both the subject of a product stewardship solutions and enhanced resource recovery capacity. A key strength of the RMF is that it brings together both Federal and State Government and provides a level of funding support that helps mitigate the inherent risk associated with the recovery and recycling of resources, particularly in our domestic settings where the amount of feedstock is limited and highly dispersed across the country.

the effectiveness of the Australian Government's engagement with states, territories, industry and non-government organisations to reduce plastic pollution particularly in oceans and waterways

As noted above we believe that in the main Australia's National Plastic Plan, coupled with the National Waste Policy, has been an important step in addressing plastic wastage and pollution. One of the key actions emanating from the National Plastics Plans has been the efforts to "Phase out Problematic and Unnecessary Plastics". Whilst we support the broader intent that sits behind this action, its implementation has been driven and implemented by

the various State jurisdictions in an incohesive fashion. That has led to significant differences in the policies and plans proposed and taken. As an Australian business with a national footprint, we have noted that some jurisdictions have adopted a fundamentally different approach to single use plastics – with some States such as Western Australia (and also potentially the ACT) favouring a solution that will see alternatives to plastic products so that these can be managed through a Food Organics / Garden Organics (FOGO) composting solution, whilst others State Jurisdictions have had a more targeted approach to certain plastic products, whilst being supportive of a broader sustainability outcome. However, even those jurisdictions that have adopted a broader sustainability approach, have nonetheless embarked on a different pathway with respect to products and items targeted, implementation timeframes, guidelines for exemptions, definitions of what is meant by "single use" and "re-use", and benchmarks / criteria that provide proof of re-usability. This has contributed to the overall market uncertainty and created, what we believe, is an unnecessary administrative and compliance burden for the overall sector, and inadvertently applied a handbrake to business investment decisions. More importantly we believe it undermines the overall effectiveness of this action as it will require consumers to behave differently with respect to disposal of some products (for example take away containers) in some States as they would in others. It is conceivable that the confusion experienced by the public will see contamination of both recycling and FOGO waste streams. This also comes at a time when the States (and Commonwealth) are working towards standardisation of kerbside collection systems to make it easier for the public to "recycle right". As such we call on Federal Government to take a leadership role to work towards a more harmonised approach with the States.

the effectiveness of community campaigns to reduce plastic pollution particularly in oceans and waterways and encourage the use of alternative materials

At Genfac Plastic we are very mindful that plastics are a significant contributor to both litter and pollution of our waterways and oceans. This, in part, reflects the fact that many plastic products are cheap to produce, are lightweight, and intended for single use. Furthermore, they have proven, in some instances, to be problematic in that they can contaminate recycling or composting feedstock streams and don't readily breakdown in the environment. All this has contributed to a mindset in which plastics are seen as a problem and to a degree demonised and as such to be avoided (at all costs). We believe this mindset leads to less rational decision making and subsequently overlooks the inherent environmental, social and economic benefits of plastics (and plastic products). It is noteworthy that plastics in the main have a lower carbon footprint, use less water, supports hygiene outcomes, and are readily affordable (which may now have greater relevance at a time of cost-of-living pressures). In essence, what this indicates is that as a society (and economy) we need to do far better with how me manage plastics.

Whilst the single-use plastic bans will lead to a number of positive outcomes in some areas by eliminating or at least reducing a number of plastic products produced and ending up in litter streams, it may also lead to a substitution with alternative materials and products. These alternatives may have worse environmental footprint and we must therefore consider these carefully in making future policy decisions. In the current settings we think some of the policy actions are actually working against keeping products and resources in use and in the productive economy. To address this we recommend that policy development is evidence based and examines life-cycle benefits of potential options.