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Committee Secretary
Product Stewardship Amendment (Packaging and Plastics) Bill
Department of the Senate
PO Box 6100
Parliament House
CANBERRA ACT 2600, AUSTRALIA

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Dear Sir or Madam,

RE: MidWaste Response to the Product Stewardship Amendment (Packaging and Plastics) Bill

This submission has been prepared by MidWaste voluntary regional waste group, which represents six councils on the Mid North Coast of NSW, including Bellingen Shire, Coffs Harbour City, Kempsey Shire, MidCoast, Nambucca Shire, and Port Macquarie-Hastings Councils.

MidWaste welcomes the opportunity to provide comment to the Product Stewardship Amendment (Packaging and Plastics) Bill. In principle, we are highly supportive of mandating product stewardship for packaging and plastics and other problem wastes, particularly when voluntary and coregulatory arrangements fail. We believe the overall approach of this Bill is commendable and consistent with many policy reviews and other initiatives/strategies currently underway. All of these have capacity to reduce the impact of packaging and plastics on the environment and lead us towards a circular economy. There is, for the first time, real opportunity for reform of the system at national and state/territory level and we believe the outcomes of this Bill will be better served by following existing and pending policy and other initiatives rather than preceding them. We recommend that any amendments (and timing thereof) to the Act take into consideration the factors outlined below:

- COAG packaging targets have been set and Australian Packaging Covenant APCO has been charged with ensuring these targets are met as outlined below:
 - 100% reusable, recyclable or compostable packaging
 - 70% of plastic packaging being recycled or composted
 - 30% of average recycled content included in packaging
 - The phase out of problematic and unnecessary single-use plastics packaging.
- The *National Environment Protection (Used Packaging Materials) Measure 2011*, a measure that requires all states and territories to provide and enforce regulations to underpin the Covenant and create a level playing field for businesses is due for review/amendment.
- The National Waste Policy and its Action Plan have been updated to include:
 - the COAG targets for packaging;
 - an 80% recovery rate of material across all waste streams; and
 - a commitment to drive procurement strategies for recycled material.

- The recently announced export ban and timeline on waste plastic, paper, glass and tyres that have not been processed into a value-added material. This will require the strategic development of significant domestic reprocessing and manufacturing facilities for plastic, as well as the development of end markets.
- The review of the Commonwealth Product Stewardship Act 2011 will be released shortly. This Act has been under-utilised and the review provides an opportunity to address this. The Australian Government's election commitment of \$20 million for the Product Stewardship Investment Fund is also yet to be released.
- Various states and territories are developing policy and legislation on single use plastics, as well as the circular economy, that are at various levels of adoption.
- The NSW Government has announced the development of a Plastics Plan as part of the NSW 20-year Waste Strategy.
- The capacity and capability of the recycling and remanufacturing industry in Australia to respond to a mandatory product stewardship scheme for packaging and plastics will be crucial.
- Government procurement (at all levels) mandating recycled content targets will provide opportunities and certainty to create domestic markets for recycled content (end of life solutions must be considered in all procurement processes).
- Any amendments to the existing Act should provide clear policy direction and market certainty, including an overarching framework to guide the development of sound, practical regulation that provides the 'how to' for the amendment, including listing product types and setting of national levies.

MidWaste are very supportive of mandatory product stewardship schemes, provided they are well designed and aim to ensure that product developers and manufacturers take responsibility for their products' full lifecycle. This is one means through which we can transition to a truly circular economy. Our group is committed to working with the Federal Government to develop appropriate schemes for plastics and other problem wastes.

Please do not hesitate to contact Ms. Ali Bigg (Coordinator, MidWaste) on the above contact details for further discussion of the content of this submission.

Yours truly,

Gavin Hughes
Executive Officer, MidWaste