



Recycling and Waste Reduction Bills 2020

WWF-Australia Submission

WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature. WWF is active in more than 100 countries, and has approximately five million supporters worldwide.

Our organisation has a global priority to achieve no plastic in nature by 2030. Recognising that there is no single solution to plastic pollution, our No Plastic in Nature campaign advocates for a combination of strategies that accelerates a transition to a circular plastics economy. Our work focuses on eliminating problematic and unnecessary plastic and ensuring that the plastic we do use is kept in the economy and out of the environment.

WWF-Australia welcomes the Federal Government's Recycling and Waste Reduction Bills. Reducing and recovering our waste are urgent priorities for Australia and the Federal Government's initiative to implement the waste export ban via this Bill is an incredibly welcome initiative. By bringing responsibility for plastic waste onshore, Australia can reduce its reliance on overseas markets where we have little control over waste management practices and plastic leakage. Banning the export of waste also provides the certainty and confidence needed to build and grow our domestic recycling sector which will dramatically increase our ability to recover waste materials in Australia.

Australia has an ambitious waste agenda with targets that will require a shift in how we think about and manage waste. Enhancing our waste management and recycling capabilities are incredibly important and welcome initiatives. To support this, greater responsibility on those putting products on the market is also imperative to ensure there is a reduction of problematic plastics used and an increase in product reuse and recyclability.

The product stewardship section of the legislation provides a solid foundation for robust product stewardship in Australia. However, the legislation in its current form is a missed opportunity to address priority problematic waste streams such as single-use plastics and plastic packaging. As such WWF recommends the following to strengthen the Recycling and Waste Reduction Bill's ability to achieve waste reduction, especially in regard to plastic pollution;

- 1. Include the National Waste Action Plan targets within the Act**
- 2. Utilise the mandatory product stewardship provisions to;**
 - a. Phase out the most problematic and unnecessary single-use plastics**
 - b. Transition the 2025 packaging targets to mandatory product stewardship**
 - c. Require the Australasian Recycling Label for all packaged goods placed on the market.**

Recommendation 1: Include the National Waste Action Plan targets within the Act

The Government has committed to the targets set under the National Waste Action Plan. These are commendable targets that will accelerate Australia's transition to a circular economy. Considering the commitment to the Plan and the relevancy of this Act to achieve the Plan's targets, we strongly recommend that the National Waste Action Plan is embedded within the Act and included in the Objects of the Act as well as built into the legislation. This will ensure that the Act continues to deliver the targets set under the National Waste Action Plan.

Recommendation 2: Utilise the mandatory product stewardship provisions to;

a) Phase out the most problematic and unnecessary single-use plastics

The first step towards reducing plastic pollution is to phase out the most problematic single-use plastics, especially where alternatives exist. A recent WWF report produced in association with Boston Consulting Group (BCG) found that 80% of the plastics polluting the Australian environment are single-use plastics.¹ BCG calculated that the weight of this plastic each year is equivalent to the weight of more than two Titanic ships.

Leadership and harmonisation efforts are needed at a federal level to achieve a phase-out of problematic and unnecessary plastics. While we have seen encouraging progress on single-use plastics from many states and territories, the inconsistencies between regulations and the lagging of some of the most populous states calls for federal direction on single-use plastics. Similar to the EU Directive 2019/904, this Bill should require a national phase out of;

- Plastic straws and stirrers
- Plastic utensils
- Plastic cups, lids, bowls, plates and containers
- Expanded polystyrene food ware
- Oxo-degradable plastic products
- Thick plastic bags
- Microbeads.

There are viable alternatives to every one of the listed single-use plastic items. Australian businesses, innovations and alternate models exist and can be scaled up to replace single-use plastic. By phasing-out these items via mandatory product stewardship, Australia can accelerate a transition to a circular economy where millions of dollars of economic value aren't thrown away after a short use.

b) Transition the 2025 packaging targets to mandatory product stewardship

Packaging waste presents a unique and persistent problem in Australia. As a category, it comprises the largest share of Australia's plastic consumption and the majority of plastic packaging ends up in landfill or the environment. The current recycling rate for consumer

¹ WWF, 2020, *Plastic Revolution to Reality: A roadmap to halve Australia's single-use plastic litter*

packaging is 16%.² Plastic consumer packaging also consistently ranks as the biggest contributor to marine plastic debris in Australian litter databases.

With the amount of plastic packaging placed on the market expected to increase by 127% over the next five years, there is an urgent need to improve the way plastic packaging is designed, used and recovered in Australia.³ This is even more urgent considering the waste export ban and the need to process all plastic waste domestically. Currently, only 3.6% of the plastic consumed in Australia is from locally processed recyclate.⁴ To effectively create market pull from Australian industry, it is crucial to improve the quality and cost of secondary materials through upstream accountability measures.

The Government has made a clear commitment to increase the recycling of packaging waste and the recyclability of packaging through the 2025 Packaging Targets. WWF strongly supports these ambitious targets. A target for 70% of plastic packaging to be recycled or composted by 2025 would dramatically transform the market. Voluntary measures to target packaging and commitments by individual businesses have been a welcome step. However, these measures alone will not reach these targets or adequately transform how we use and dispose of packaging in Australia quick enough to address unsustainable levels of plastic pollution in Australia.

Transitioning packaging targets to mandatory product stewardship would ensure targets are met and that industry players who are demonstrating best practice are not disadvantaged. The issue of free-riders within the current scheme is seen as a high risk and will continue to be so unless a level-playing field is set by the Government.

c) Require the Australasian Recycling Label for all packaged goods placed on the market

A key tool to aid consumers in making informed plastic choices and to improve the disposal of products is honest and clear labelling. The Australasian Recycling Label (ARL) provides clear recycling and disposal information and helps inform people who want to avoid non-recyclable packaging options. Currently this system is voluntary and there is little guarantee that products that are labelled recyclable are actually recycled. A mandatory scheme within the product stewardship component of this Bill with appropriate compliance and enforcement mechanisms is essential to harnessing people power. It would educate and inform Australians and creates an incentive for manufacturers to design out non-recyclable materials.

In summary

The world's oceans are at risk of being overrun by plastic. Each year, up to 130,000 tonnes of plastic enters Australian oceans and waterways, presenting a devastating threat to our natural world, marine life and human health.

² APCO, 2019, *Australian Packaging Consumption & Resource Recovery Data and Envisage Works and Sustainable Resource Use, 2018*

³ APCO, 2020, *Our Packaging Future*

⁴ Envisage Works and Sustainable Resource Use, 2018, *2017-18 Australian plastics recycling survey – national report*

While the trajectory for plastic growth shows the crisis is expanding, we can change this through effective accountability measures. Amending the Recycling and Waste Reduction Bill 2020 to eliminate single-use plastics and mandate plastic packaging targets and labelling could dramatically transform waste management in Australia and ensure the reduction, reuse and recycling of plastic waste.

WWF-Australia looks forward to working with the Environment and Communications Legislation Committee to achieve this. For further information, please feel free to contact our No Plastic in Nature Policy Manager, Katinka Day on _____ or at _____