



Inquiry into plastic pollution in Australia's oceans and waterways
House of Representatives Standing Committee on Climate Change, Energy, Environment
and Water
PO Box 6021
Canberra ACT 2600
Email – CCEEW@aph.gov.au
Attention – Committee Secretary

Dear Madam/Sir,

Accord is pleased to provide this submission to the HoR Environment Committee on the Inquiry into plastic pollution in Australia's oceans and waterways.

Introducing Accord

Accord is the Australian national industry association representing the manufacturers and marketers of formulated hygiene, personal care and specialty products, their raw material suppliers, and service providers. Accord member companies make and/or market a broad range of consumer and commercial goods that play integral roles in safeguarding public health, promoting personal hygiene, boosting confidence and emotional wellbeing, maintaining comfortable homes and enhancing quality of life, as well as keeping the wheels of commerce and industry turning. Member companies include large global manufacturers as well as small dynamic Australian and family-owned businesses. A list of Accord member companies is available on our website: <http://accord.asn.au/about/members>.

The formulated hygiene, cosmetic, personal care and specialty products industry is a significant industry sector contributing to a prosperous economy. Our industry's products include household and commercial cleaning agents; household and hospital disinfectants; industrial and agricultural sanitisers; adhesives and sealants; and important personal care and hygiene products like oral care products, hand sanitisers and sunscreens.

Promoting sustainability and corporate social responsibility is a core activity for Accord. Ours is an industry that seeks to grow and prosper in an environmentally and socially responsible manner. We engage collaboratively with government and other stakeholders to advance sustainability in an evidence-based manner, addressing tangible health and environmental risks.

Key examples of such industry actions include: the successful voluntary industry phase-out of solid plastic microbeads via Accord's *BeadRecede* campaign; numerous educational and safe/sustainable product-use websites like WashWise (www.washwise.org.au), WipeSmart (www.wipesmart.org.au), Hygiene for Health (www.hygieneforhealth.org.au), Sunsible (www.sunsible.org.au), and FitforFood (www.fitforfood.org.au); the 1994 Phosphorus Standard for laundry detergents; and the Voluntary Industry Code of Practice to Support the Australian Ban on Testing Cosmetics on Animals.

All of our association's industry initiatives are profiled in a one-page infographic attached (see Appendix 1).

Accord's specific comments on the issue of plastic pollution

Accord notes the broad terms of reference for this inquiry and the overall breadth and complexity of the plastic pollution issue.

We also note that there are many policy measures, programs and activities currently being advanced in Australia by federal, state and local government, industry, NGOs, and the academic community to address plastic pollution. This inquiry therefore appears a good opportunity for a 'stock take' of these many activities with a view to assessing their individual and collective effectiveness.

Our brief submission to this inquiry will focus mainly on Accord's activities via the BeadRecede campaign and our active engagement with international counterpart industry bodies to develop global positions supporting measures like the development of a UN Plastics Treaty.

To help drive industry action for sustainability, Accord first published a Sustainability Charter in 2012. This was updated in 2019 and encourages a forward-looking focus in two areas – Social Responsibility and Environmental Stewardship – highlighting how businesses can take positive actions to advance both in the context of the United Nation's Sustainable Development Goals. Our Charter can be viewed at <https://accord.asn.au/sustainability/accord-sustainability-charter/>.

Additionally, Accord's existing focus on plastics and packaging waste policy is outlined in the following section of our website - <https://accord.asn.au/sustainability/plastics-and-packaging-waste/>. Accord is a member association of the Australian Packaging Covenant Organisation (APCO). A key service we provided member businesses over the last few years, especially during the pandemic, were our free online information sessions from key waste policy/service organisations like APCO, RecycleMate, Terracycle, Close the Loop and Sustainable Salons.

A challenge facing our organisation is our very diverse membership, which covers the full range of hygiene and personal care products from industrial/B2B large-format disinfectant/cleaning products to FMCG homecare/personal care products to small-format make up and other 'luxury' cosmetic products. Across this diversity, it is simply not possible to develop and institute 'one size fits all' approaches related to plastics and plastic waste.

Additionally, as a relatively small association with limited resources we are always careful to prioritise any areas for industry-wide action to just those we can effectively deliver within these resource constraints. BeadRecede, which is covered below, is a shining example of effective industry-wide action.

On an ongoing basis across our membership, there are many brands that have been active both here and internationally with innovative advances for more sustainable packaging and improved product design. Product packaging design initiatives fit most readily with individual firms in the industry. Their efforts to develop innovative approaches to design out end-of-life waste for their products offer great potential as cost-effective options for reducing plastic pollution risks.

1. BeadRecede – delivering the successful phase-out of solid plastic microbeads

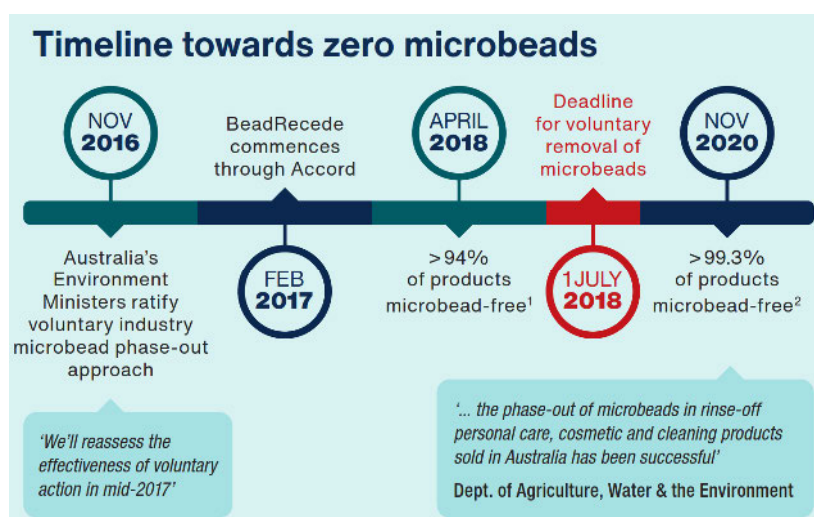
Commencing formally in February 2017, Accord's BeadRecede campaign put into action the agreement by the nation's environment ministers in November 2016 to ratify a voluntary industry phase-out for solid plastic microbeads in rinse-off personal care and cleaning products. The deadline for the voluntary phase-out was set as 1 July 2018.

The BeadRecede campaign was independently assessed as achieving a >94 per cent phase-out by April 2018 and then further measured as delivering a result of >99.3 per cent of products being microbead-free in November 2020.

As a result, the federal Department of Climate Change, Energy, the Environment and Water has updated the National Waste Policy Action Plan to mark the actions on microbeads as “delivered”¹:

5.06	Phase out 100% of microbeads from rinse off cosmetic and personal care products, and report on options to broaden the phase out to other products	Business sector	All governments	Delivered
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The following extract from Accord's BeadRecede campaign infographic (see Appendix 2) summarises the voluntary phase-out achievement:



Formally underpinning Accord's extensive outreach and engagement to garner industry buy-in for the phase-out was a monitoring and assurance protocol that the Commonwealth issued Accord in December 2018. This protocol outlined expectations for ongoing BeadRecede campaign action until June 2022.

All costs and resources required to deliver the BeadRecede campaign were absorbed by Accord without any direct financial assistance from government.

Despite the success of the voluntary phase-out, the governments of NSW and WA announced plans to mandate bans on solid plastic microbeads in June 2021. Via the *Plastic Reduction and Circular Economy Act 2021* the NSW ban came into force on 1 November 2022. WA's ban will be in force in 2023. And more recently, Queensland has also committed to implementing a ban.

While Accord does not oppose the concept of regulation to cement in place the success of the voluntary phase-out *per se*, two significant concerns remain regarding such action.

¹ See - <https://www.dcceew.gov.au/sites/default/files/documents/national-waste-policy-action-plan-annexure-2022.pdf>

The first relates to perennial problems that businesses face when trading nationally. That is, *lack of national uniformity* and instead having to deal with differing state and territory laws and regulations. There is an ongoing risk via the introduction of a sequence of state-by-state bans on microbeads, in an uncoordinated manner, that differing requirements and interpretations will be imposed. Experience with the differing state/territory approaches and timings for addressing problematic single-use plastic items bears this out.

Accord wrote to the Premiers of NSW and WA emphasising this concern when both announced their proposed bans. The following is an extract that was common to both letters, stressing the need for harmonisation and maintaining consistency with the BeadRecede phase-out:

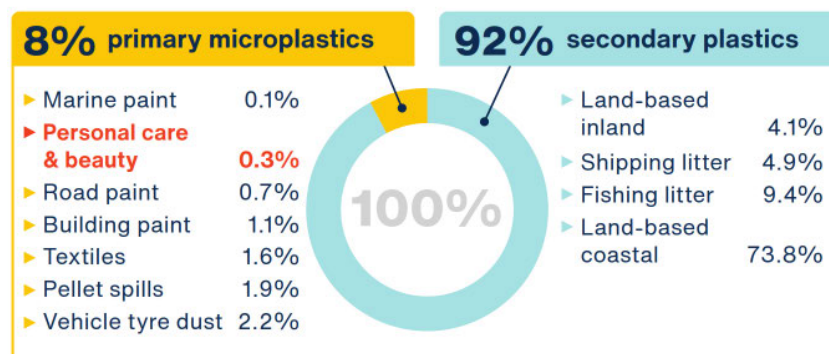
The hundreds of businesses that comprise the cosmetics and personal care products industry in Australia operate nationally and sell their products to Australian consumers across all states and territories. It is critical therefore that product bans are implemented in a uniform manner across the nation. And that there be consistency between all states and territories regarding the details of any such bans.

Inconsistent and potentially conflicting approaches that may arise from lack of coordination between states and territories are a nightmare for businesses. Manufacturers rightly expect that they can sell their products across our nation without differing standards and rules. And Australian consumers expect to be able to purchase the same quality products, regardless of which state or territory they call home.

The second concern relates to the sometimes-neglected principle of *proportionality*. That is, environmental policy interventions should be proportional to the actual risk of harm and therefore prioritised to address the most consequential sources of pollution or environmental degradation. In other words, the magnitude of the policy intervention should not be disproportionate to the actual environmental impacts or risks. Proportionality is a key component of an evidence-based approach to environmental management.

While early policy attention was placed on microbeads, the fact remains that other microplastic sources such as automotive tyre particles are more significant in terms of their pollution potential and risk of harm. The BeadRecede infographic (Appendix 2) provides comparative data on the relative contribution of various sources of microplastic entering the environment. Here is the relevant chart based on data from 2016² (prior to BeadRecede) that shows microbeads as making a material contribution of just 0.3 per cent of total plastic pollution compared to tyre particles at 2.2 per cent and the laundering of textiles at 1.6 percent.

Sources of plastic entering the marine environment³



² and ³ <https://www.eunomia.co.uk/reports-tools/plastics-in-the-marine-environment/>

Via the principle of proportionality, it is obvious that more attention was, and is still, needed on these other microplastic pollution sources. It is therefore welcome that policy attention has finally been given to some of these, most notably textile microfibres, via announcement to phase-in washing machine filters on new machines. In this context, time and effort spent by governments instigating and implementing new state/territory laws to ban already phased-out microbeads is time that could be better placed addressing other more consequential sources of plastic pollution.

Salient to this point was the fact that no cost-benefit analysis on the ban of microbeads was attempted by the WA Department of Water and Environmental Regulation (DWER) for its comprehensive “Stage 2 of Western Australia's Plan for Plastics” Discussion Paper⁴.

The Department noted: “While cost-benefit analysis on policy options is not considered viable for microbeads, there remains benefit to policy intervention to ensure voluntary measures are converted to permanent change for environmental benefit.” In comparison, detailed cost-benefit data was prepared and presented by DWER for all other targets of this state's Stage 2 plastics plan implementation.

In conclusion, our industry has acted pro-actively and responsibly in phasing out solid plastic microbeads via BeadRecede. However, there is very little tangible evidence to support microbeads being focused on as a priority over and above the many other potential sources of marine plastic pollution.

2. Global industry positions and support for the establishment of a UN Plastics Treaty

Accord actively engages with global coalitions for the industry sectors we represent and these often adopt a forward-looking agenda on emerging sustainability challenges.

Addressing plastic pollution while maintaining the appropriate, ongoing use of plastic where beneficial have been areas of policy consideration for our industry globally.

In January 2020, the International Network of Cleaning Product Associations (INCPA), of which Accord is a founding member, published a global industry position statement outlining nine policy principles considered vital for successful management of plastic packaging and progression to a circular economy approach. The “Principles for Management of Plastic Packaging in a Circular Economy” is attached as Appendix 3.

On 2 March 2022, an alliance of 37 cosmetic industry associations (inc. Accord) published a detailed Industry Statement – “The Beauty and Personal Care Industry Supports a Global Agreement to Address Plastics Pollution” – outlining seven industry-agreed policy principles to support an effective and well-constructed treaty. A copy of this Global Industry Statement is attached as Appendix 4. Accord fully supports the development of a UN Plastics Treaty.

At this formative stage of the UN treaty's development, one element within the Global Industry Statement stands out as needing early adoption. This relates to the necessity for harmonised definitions. In this regard, Accord supports the use and adoption of relevant International Standards Organisation (ISO) definitions and points specifically to those contained in “ISO 14021: Environmental labels and declarations” and “ISO 18604: Packaging and the environment”. Similarly, national approaches within Australia should look to such globally standardised definitions.

⁴ <https://www.wa.gov.au/government/publications/stage-2-of-western-australias-plan-plastics>



Incorporation of the six other policy principles outlined in the Industry Statement into the approach for developing this important UN Plastics Treaty will help to drive its success and impact.

The policy principles as outlined in both the INCPA Industry Position and the Global Industry Statement from the cosmetic industry should also be viewed as providing a helpful framework for developing plastics pollution policy within the Australian context.

Noting the Inquiry's very broad terms of reference and the many activities and organisations currently involved in this area, it is hoped that the committee will be able to report on the state of play across the nation.

On behalf of Accord's member businesses, the opportunity to provide this submission on our recent activities and policy initiatives is appreciated.

Yours sincerely,

<Unsigned for electronic transmission>

Craig Brock
Policy & Public Affairs Director

20 December 2022

Sustainability & CSR Leadership

Accord and our Member Companies have an important and valuable role to play in creating positive social and environmental impacts through our products, practices and performance.

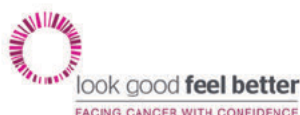
Accord's sustainability leadership in social responsibility and environmental stewardship is showcased through many proactive initiatives.



1990

Look Good Feel Better

Cancer patient support program to boost self-esteem and wellbeing.



1994

Phosphorus Standard

Phosphorus content and labelling requirements for household laundry detergents.

(Updated 2002, 2010)



2005

Accord Quality Commitment

Assurance that Accord Members take seriously their responsibility for quality, safety and the environment.



2010

WashWise® (Relaunched 2019)

Consumer information on sustainable laundry practices and product use.



What's in it?

Ingredient information to aid choice and enhance confidence in household products.



HOUSEHOLD
CLEANING
PRODUCT
INGREDIENT
DISCLOSURE

2011

Hygiene for Health

Information on the vital role of hygiene in preventing the spread of infection and illness.

(Relaunched 2020)



2012

Sustainability Charter

Fostering social responsibility and environmental stewardship on key industry-related issues.

(Relaunched 2019)

Furphies

Clarifying myths and misconceptions relating to cosmetics, personal care and cleaning products.



Recognised®

Third-party assessed ecolabel for commercial cleaning & hygiene products.



2016

Sunsible®

Promoting effective sun protection through correct use of sunscreen and other sun safety measures.



2017

BeadRecede

Industry-led voluntary phase-out of plastic microbeads in rinse-off cosmetics, personal care and cleaning products.



2019

WipeSmart

Promoting better use and disposal of wet wipes.



2021

Animal Test Ban Voluntary Code of Practice

Assisting industry to meet its animal test ban obligations & communicate with consumers with greater transparency and consistency.



2022

FitForFood

Guiding decision-making on the suitability of cleaning and sanitising products for use in food premises.



Hygiene products in food premises

These are Accord's major sustainability initiatives. For additional Industry Codes, Industry Guidelines and information initiatives see accord.asn.au/sustainability or accord.asn.au/sustainability/accord-sustainability-charter

Accord was established in 2005 by the merger of the Australian Consumer and Specialty Products Association (ACSPA) and the Australian Cosmetic Toiletry and Fragrance Association (CTFA). Formerly, ACSPA was the Australian Chemical Specialties Manufacturers Association (AC SMA).

BeadRecede: Protecting Precious Aquatic Environments



Rinse-off personal care & cosmetic products sold in Australia are effectively microbead-free. To help protect our precious natural waters from potential microplastic contamination, personal care and hygiene companies have reformulated their rinse-off products so they no longer contain solid plastic microbeads.

Progress towards zero microbeads

Progress towards zero microbeads in Australia was coordinated through Accord's **BeadRecede** campaign.

Industry acted quickly to remove and replace microbeads with non-plastic ingredients.

What is a microbead?

- Solid plastic
- Insoluble in water
- Spherical or irregular



Success! Every little bit helps...

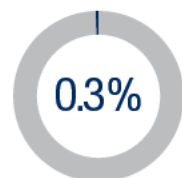
Microbeads from personal care and beauty products, globally, were estimated to contribute approximately 0.3% of the plastics entering the marine environment.³

Most marine plastics come from the breakdown of larger plastics in the environment, such as plastic bags and water bottles (secondary plastics).

Australia's successful industry phase-out has been matched by phase-outs in other nations including the USA and New Zealand.



All other marine plastic sources



Personal care & beauty

What now?

The personal care, cosmetic and cleaning products industry in Australia has done its part.

Action on other, much more significant sources of microplastic in the marine environment should now be the focus, such as controlling land-based litter sources, shipping/fishing litter and significant sources of primary microplastics.

Accord supports the development of a UN Plastics Treaty and has joined with 36 sister associations to release a new global industry statement, *The Beauty and Personal Care Industry Supports a Global Agreement to Address Plastics Pollution*.

Extensive outreach to companies

Ongoing monitoring

Reporting to Environment Ministers



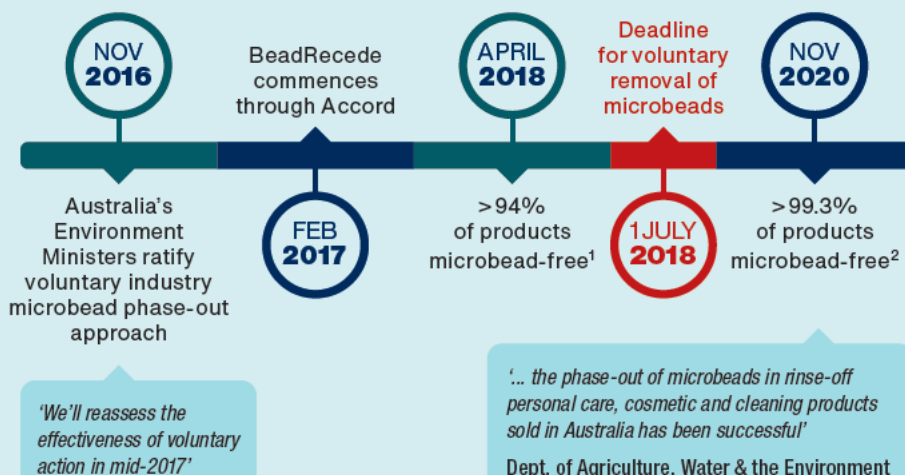
Voluntary phase out of plastic microbeads

Data collection & analysis

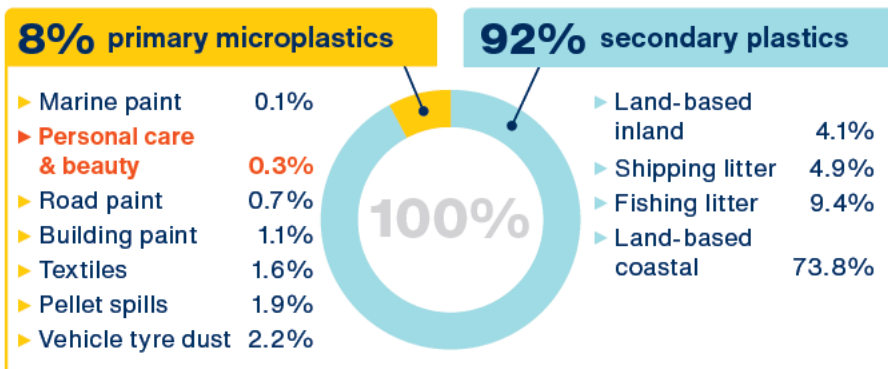
Industry surveys

Collaborative engagement with Environment Departments

Timeline towards zero microbeads



Sources of plastic entering the marine environment³



¹ According to independent on-shelf survey commissioned by Federal Environment Dept. (included out-of-scope products, including leave-on cosmetics such as blush and eye make-up)

² According to independent on-shelf survey commissioned by Federal Environment Dept.

³ <https://www.eunomia.co.uk/reports-tools/plastics-in-the-marine-environment/>

Accord contributes to solving potential environmental issues relating to our industry in collaboration with our member businesses, policymakers, NGOs and other stakeholders. See our Sustainability Charter for other key focus areas in Environmental Stewardship.



Principles for Management of Plastic Packaging in a Circular Economy

The International Network of Cleaning Products Association (INCPA) recognizes that cleaning and maintenance products are essential to society. INCPA members are committed to developing, manufacturing, distributing and marketing innovative, sustainable and effective products that protect health and quality of life through cleanliness and hygiene, can be used safely when following the label instructions, and that meet or exceed regulatory safety requirements. INCPA members are promoting and contributing actively to multiregional initiatives such as the UN's Sustainable Development Goals, the Oceans Plastics Charter, Alliance to End Plastic Waste and/or other relevant international, regional and country circular economy approaches via different voluntary industry initiatives. INCPA members are committed to the fundamental principles of a circular economy including to design out waste and pollution, keep products and materials in use, and regenerate natural systems.

INCPA supports the following principles for the management of plastic packaging:

- A thoughtful discussion on managing plastic packaging waste requires early engagement with relevant industry stakeholders across the value chain.
- Packaging is necessary to ensure product safety, integrity and to avoid waste and spoilage. Therefore, any waste management program must preserve the ability to protect the health and safety of consumers and workers to allow for the safe transport, storage and use of the products they contain.
- Any jurisdiction transiting into circular economy of plastic packaging must first consider its infrastructure conditions.
- Plastic packaging related definitions including materials and standards need to be clear and harmonized to the greatest extent possible.
- Any programs for managing plastic packaging waste, including Extended Producer Responsibility (EPR) programs, should be based on sound science and lifecycle analysis by taking into account proportionality, costs, infrastructure, existing systems, including industry voluntary initiatives.
- Cultural consumer behaviour of the respective jurisdiction should also be considered while developing and providing effective tools to cost-effectively manage plastic packaging waste programs.
- Education and communication with consumers and product users as to their valuable role is key to the success of any program for managing plastic packaging waste.
- All such programs should be developed transparently and in consultation with relevant stakeholders and be subject to their review and comment to ensure aligned, implementable processes and effective results.
- Opportunities for inter-industry and cross-sectorial dialogue and collaboration need to be developed in order to effectively facilitate and implement feasible circular solutions for plastic packaging waste.

Approved 27 January 2020

The International Network of Cleaning Product Associations ([INCPA](#)) is an informal coalition of trade associations located in various regions of the world that represent cleaning and maintenance product formulators. INCPA coordinates and actively engages in targeted efforts to better understand and address chemical ingredients management issues of an international or a cross-regional nature that affect the cleaning products industry.



The Beauty and Personal Care Industry Supports a Global Agreement to Address Plastics Pollution

March 2, 2022 – Cosmetics and personal care products companies are global leaders committed to product safety, quality, and innovation as well as sustainable business practices. Our member companies are some of the most beloved and trusted brands in beauty and personal care today. As the manufacturers, distributors, and suppliers of a diverse range of products millions of consumers rely on to enhance their health and well-being, – from sunscreens, toothpaste and shampoo to moisturizer, makeup, and fragrance – our industry contributes significantly to the world economy.

We strongly support a legally binding treaty that will address plastics pollution through improving waste management and recycling systems; by promoting innovation and eco-design; and by reducing the production and use of virgin plastic where possible and beneficial to the environment. We believe that promoting a circular and sustainable economy is intrinsically related to solving this issue. Our companies support the achievement of the UN Sustainable Development Goals (SDGs)¹, and many have made robust pledges² while taking progressive action in support of transitioning to a circular economy and ending plastics pollution. In this regard, our industry is fervently exploring and adopting where currently possible different distribution models including refilling and recharging as well as alternative packaging materials. At the same time, we recognize the importance of plastics in achieving the UN SDGs³ and the role they can play toward achieving a circular economy. In many cases, plastics, especially when recovered and reused, may have a lower carbon footprint or be the alternative that best safeguards our environment⁴.

Our industry supports a global legally binding treaty to address plastics pollution based on the following principles:

- **Adaptability in implementation:** The treaty should allow flexibility for signatories to create frameworks that best enable them to meet the objectives agreed upon within the treaty.

¹ Personal Care Product Council's 2019 "[Creating a More Beautiful World](#)" sustainability report

² Ellen McArthur Sector Insights: [Progress Report](#); [Cosmetics](#); [Household and Personal Care](#)

³ [UN Sustainable Development Goals](#)

⁴ [Plastics and Sustainability: A Valuation of Environmental Benefits, Costs, and Opportunities for Continuous Improvement](#)



- **Interventions across the full lifecycle of plastic:** The treaty must include both upstream and downstream measures to address plastic pollution.
- **Life cycle assessments:** Cognizant of the pressing need to limit climate change, plastics and alternatives should be evaluated along their lifecycle.
- **Guidance on product design:** Flexibility in product design is paramount and we encourage the parties to collaborate with industry to develop guidelines on product design that enhance circularity, foster innovation while also ensuring product integrity and consumer safety.
- **Increase post-consumer technology capacity and deployment:** Post-consumer management of plastics, including effective collection, recycling, and value recovery of waste, is essential to eliminate leakage into the environment and to adequate, high quality Post-Consumer Recycled Plastic feedstock which is necessary for a circular economy to function.
- **Harmonized definitions and reporting:** To the extent possible and without prejudice to local differences, the treaty must provide harmonized definitions and reporting on plastic and plastic waste that leverages existing international standards and definitions (e.g. ISO). In the absence of such standards, definitions and metrics, parties should collaborate with industry to develop these using validated and harmonized methodologies.
- **Proportionality:** The treaty must respect the principle of proportionality to ensure outcomes that efficiently and equitably address the issue.

Endorsed by the regional personal care products industry associations from: ASEAN; Central America; Europe; and Latin America

Endorsed by the national personal care products industry associations from: Argentina; Australia; Belgium; Canada; Colombia; Czech Republic; Dominican Republic; Ecuador; France; Germany; Greece; India; Italy; Japan; Mexico; Netherlands; New Zealand; Paraguay; Peru; Philippines; Poland; Russia; S. Korea; South Africa; Spain; Switzerland; Thailand; Turkey; Ukraine; Uruguay; UK; USA; Singapore