

Inquiry into Australia's waste reduction and recycling policies

Senate Standing Committee on Environment and Communications



INTRODUCTION

CropLife Australia (CropLife) is the national peak industry organisation for the plant science (registered agricultural chemicals and plant biotechnology innovations) sector in Australia. CropLife represents the innovators, developers, manufacturers, formulators and suppliers of crop protection products (organic, synthetic and biological based pesticides) and crop biotechnology seed innovations. CropLife's membership is made up of both large and small, patent holding and generic, Australian and international companies and accordingly, CropLife only advocates for policy positions that deliver whole-of-industry and national benefit. Our focus is, however, specifically on sustainable environmental land management and an Australian farming sector that is internationally competitive through globally leading productivity and sustainability practices. Both of which are achieved through access to world-class technological innovations and products of the plant science sector.

The plant science industry contributes to the nation's agricultural productivity, environmental sustainability and food security through innovation in plant breeding and pesticides that protect crops against pests, weeds and disease. More than \$31 billion of the value of Australia's agricultural production is directly attributable to the responsible use of crop protection products, while the plant science industry itself directly employs thousands of people across country.¹ CropLife Australia is a member of CropLife Asia and part of the CropLife International Federation of 91 CropLife national associations globally.

CropLife welcomes the opportunity to comment on the Senate Standing Committee on Environment and Communications' inquiry into the effectiveness of the Government's waste reduction and recycling policies. CropLife and its members are leaders in Australia's transition toward a circular economy. Our stewardship programs and initiatives are world-leading and have set an example for other industries to follow suit. **drumMUSTER**[®] is CropLife's flagship product stewardship initiative and is administered by Agsafe, CropLife's wholly owned stewardship services provider. Established 25 years ago, **drumMUSTER**[®] is a genuine, industry-led not-for-profit program that collects and recycles empty and eligible agricultural chemical drums into new products by processors based here in Australia. These products include wheelie bins, fence posts and park

¹ Deloitte Access Economics, 'Economic Contribution of Crop Protection Products in Australia', August 2023, <https://www.croplife.org.au/resources/reports/economic-contribution-of-crop-protection-products-in-australia/>.

benches.² Given our long-term involvement in the delivery of genuine product stewardship initiatives, our submission will focus on our experience interfacing with the Government's policy changes to deliver a circular economy and how CropLife and its members are well placed to support the Government and the Australian community to achieve our shared sustainability goals.

(a) THE RECYCLING AND WASTE REDUCTION ACT 2020

Community and economic benefits

CropLife and its members funded the development and implementation of **drumMUSTER**[®] in 1999, long before the introduction of regulatory requirements. By facilitating the collection and recycling of eligible empty and clean agricultural chemical drums, **drumMUSTER**[®] accounts for over one-third of Australian agriculture's recycling efforts. What started as a single collection point has now expanded to over 830 sites across Australia. While this flagship initiative was established before the implementation of the *Recycling and Waste Reduction Act 2020* (the Act), the positive economic impact **drumMUSTER**[®] has had on the local communities in which it operates demonstrates and sets a benchmark for what can be achieved.³

drumMUSTER[®] is managed by Agsafe, CropLife's wholly-owned not-for-profit stewardship services organisation. Agsafe's extensive network of on-ground consultants throughout Australia's agricultural communities has played a vital role in establishing community awareness and engagement in the program. **drumMUSTER**[®] collection sites are integrated within local communities, often located at waste transfer stations and employing local personnel as part of the quality and inspection team. Additionally, in certain areas, **drumMUSTER**[®] contributes to the fundraising efforts of local community groups.⁴ And importantly, all **drumMUSTER**[®] processors are Australian-based businesses. This integration within Australia's regional and remote agricultural communities fosters trust in the Agsafe and **drumMUSTER**[®] brands, solidifying their reputation as authentic product stewardship programs with enthusiastic community support.

In another example, during the development of CropLife's latest product stewardship initiative, bagMUSTER[®], the need for reliable quantities of feedstock for advanced recycling processors has become apparent. The importance of access to feedstock was also highlighted as a significant factor limiting Australia's plastic reprocessing capacity in a 2022 report by the Australian Council

² 'DrumMUSTER', accessed 29 February 2024, <https://www.drummuster.org.au/>.

³ 'Community Groups', Drummuster, accessed 13 December 2022, <https://www.drummuster.org.au/whos-involved/inspectors/>.

⁴ 'Community Groups'.

of Recycling.⁵ Drawing on our extensive 25-year experience in the recovery and logistical management of agricultural plastic waste, CropLife and Agsafe are well positioned to facilitate the development and establishment of Australia's advanced recycling technologies by supplying the necessary feedstock. Ultimately, through nation-wide initiatives like bagMUSTER® and **drumMUSTER®**, CropLife and its members contribute to Australia's transition toward a circular economy and bring forth economic and community benefits.

Consequences

While the Act may have provided impetus to transform Australia's processing and manufacturing facilities and support Australia's transition toward a circular economy, the target timelines of relevant policies have not been feasible and consequently, realisation of the Act's full objective have been hindered.

The objects of the Act, which include reducing the negative impacts of waste, to realise the community and economic benefits of product stewardship, to develop a circular economy and contribute to Australia meeting its international obligations, are to be achieved by "*encouraging and regulating the reuse, remanufacture, recycling and recovery of products...*".⁶ However, the regulation of waste export and encouragement of the development and commercialisation of advanced recycling⁷ and reprocessing infrastructure in Australia are misaligned and have resulted in undesirable consequences that are antagonistic to the objects of the Act.

In the first instance, this misalignment, combined with community enthusiasm to "do the right thing" has resulted in a backlog and stockpiling of plastic that cannot yet be recycled e.g., REDcycle.⁸ While the aims of the Act are commendable, such unintentional scenarios threaten public trust and undermine the credibility of other effective product stewardship schemes.

⁵ N Harford and J French, 'Australian Recycling Infrastructure, Capacity and Readiness (Plastic and Paper)' (Australian Council of Recycling, June 2022), https://acor.org.au/wp-content/uploads/2023/06/220623_acor_infrastructure_readiness_report_june_2022_-_updated.pdf.

⁶ Australian Government, 'Recycling and Waste Reduction Act 2020' (Federal Register of Legislation, 1 September 2021), <https://www.legislation.gov.au/C2020A00119/latest>.

⁷ Advanced recycling involves a range of technologies that convert plastics back into their chemical building blocks. Natalie Kikken, 'Advanced Recycling', Ending Plastic Waste, 24 August 2021, <https://research.csiro.au/ending-plastic-waste/advanced-recycling/>.

⁸ 'Shoppers Told to Put Plastic Bags in the Bin after Suspension of REDcycle's Soft Plastics Recycling Scheme', *ABC News*, 9 November 2022, <https://www.abc.net.au/news/2022-11-09/redcycle-soft-plastics-recycling-program-suspended/101632220>.

Alarming, the discrepancy between the regulation of plastic waste export and the accessibility of advanced recycling technologies in Australia has inadvertently enabled for-profit business operators to exploit consumer goodwill and brand owners' responsibility, thereby fostering opportunities for greenwashing.

One example of a for-profit company seeking to take advantage of the current environment is Big Bag Recovery.⁹ Big Bag Recovery is an Australian Government Accredited Product Stewardship Scheme for agricultural plastic bags.¹⁰ While the company purport to collect and recycle industry plastic bags, it is clear from the Government's waste export exemptions that collected plastic is exported.¹¹ Unfortunately, a direct consequence for the plant science industry is that brand owners, striving to act responsibly and conduct thorough due diligence in engaging with genuine product stewardship initiatives, face community and market pressure to participate in deficient schemes. Thus, not only risking their brand's reputation but also threatening public trust in the Government's Product Stewardship Accreditation Scheme. Furthermore, such operations distort the marketplace and can hinder investment into genuine product stewardship services.

Although Australia's advanced recycling capacity, particularly for soft plastics, has not yet fully matched the quantity of plastic we can collect, CropLife and Agsafe are ideally positioned to responsibly manage these waste streams. As stated above, the plant science industry has extensive experience in the logistical management of responsibly removing waste product off farms and thereby mitigating the risk of environmental contamination.

⁹ 'Big Bag Recovery', accessed 19 February 2024, <https://www.bigbagrecovery.com.au/>.

¹⁰ 'Big Bag Recovery - DCCEEW', accessed 19 February 2024, <https://www.dcceew.gov.au/environment/protection/waste/product-stewardship/products-schemes/big-bag-recovery>.

¹¹ 'Licence and Exemption Holders - DCCEEW', accessed 19 February 2024, <https://www.dcceew.gov.au/environment/protection/waste/exports/licence-exemption-list#quarter-to-30-june-2023>.

(b) PROGRESS TOWARD A CIRCULAR ECONOMY

To progress Australia toward achieving a circular economy, there is an urgent need for government investment in commercialising and making accessible advanced recycling technologies in Australia. This need is reflected in our experience delivering genuine product stewardship initiatives, with the current bottleneck in futureproofing **drumMUSTER®** and **bagMUSTER®** being the availability of advanced recycling processors in Australia.¹² It is worth noting that for CropLife's product stewardship programs, the efficiency of our collection processors out-weigh Australia's current recycling capacity.

There is real opportunity for government investment in developing Australia's advanced recycling capacity. Identified in the CSIRO's advanced recycling report, not only does Australia possess *"unique technical expertise that would be suited to launching an advanced recycling industry for waste plastics..."*, but technologies are also currently available in Australia, including the Australian-invented Licella Cat-HTR™, which can convert 85 per cent of its plastic feedstock into virgin polymers.¹³

(c) MANDATED PRODUCT STEWARDSHIP SCHEMES

The relevant government product stewardship scheme for the plant science industry is the 2025 National Packaging Targets (the Targets).¹⁴ The Australian Packaging Covenant Organisation (APCO) is the organisation charged by government to facilitate the delivery of the Targets.¹⁵

As Australia works to reform its packaging standards, regulators must remain cognisant that while brand owners strive to be responsible stewards of their products through the whole product lifecycle, it is not within their remit or power to make available advanced recycling technologies.¹⁶

¹² Harford and French, 'Australian Recycling Infrastructure, Capacity and Readiness (Plastic and Paper)'.

¹³ S King, SA Hutchinson, and NJ Boxall, 'Advanced Recycling Technologies to Address Australia's Plastic Waste' (CSIRO, August 2021), https://www.csiro.au/-/media/News-releases/2021/Advanced-recycling-report/21-00312_REPORT_AdvancedRecycling_WEB.pdf.

¹⁴ '2025 National Packaging Targets - DCCEEW', accessed 11 April 2024, <https://www.dcceew.gov.au/environment/protection/waste/packaging/2025-national-packaging-targets>.

¹⁵ 'Australia's 2025 National Packaging Targets - APCO', accessed 11 April 2024, <https://apco.org.au/national-packaging-targets>.

¹⁶ Environment Ministers' Meeting, 10 Nov 2023 'Communiques - DCCEEW', accessed 11 April 2024, <https://www.dcceew.gov.au/about/news/stay-informed/communiques#environment-ministers-meeting>.

With this in mind, any regulatory approaches and mandated product stewardship schemes must adopt a staged approach where feasible targets are aligned with available technological options.

Furthermore, it is worthwhile noting that while APCO's vision is "*to keep packaging materials out of landfill...*", its reporting requirements and membership structure is not only burdensome but is also not-fit-for-purpose. Despite CropLife having the capability to provide reports on behalf of its members regarding participation in **drumMUSTER**[®], including collection rates that would directly address APCO's aforementioned vision, current reporting and APCO membership requirements do not enable CropLife to provide industry-wide reporting. Enabling industry bodies with existing product stewardship services to report would not only lower the transactional cost and burden of brand owners' participation, there is also opportunity for APCO to work with CropLife to address free-riders. These concerns are also shared by other brand owners and were revealed following an independent review.¹⁷

¹⁷ MP Consulting, 'Review of the Co-Regulatory Arrangement under the National Environment Protection (Used Packaging Materials) Measure 2011 - Final Report', 3 January 2022, https://www.awe.gov.au/sites/default/files/documents/independent_review_of_the_upm_nepm_and_the_australian_packaging_covenant_-_final_report_-_september_2021.pdf.