

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

29 October 2019

**Re: Submission to the Product Stewardship Amendment (Packaging and Plastics) Bill 2019
by the Grampians Central West Waste and Resource Recovery Group**

Summary Statement

The Grampians Central West Waste and Resource Recovery Group (GCWWRRG) contends that **flexible agricultural plastics** such as silage wrap, grain bags and mulch film amongst others have the potential to adversely affect the environment and should be considered as single-use plastic products in the terms described by the Product Stewardship Amendment (Packaging and Plastics) Bill 2019.

GCWWRRG submits that manufacturers, importers and distributors of flexible agricultural plastics should be required to take responsibility for these products in accordance with Division 3 Section 4(2)(e) of the Product Stewardship Act (2011).

GCWWRRG further submits that these products satisfy the product stewardship criteria as defined in Division 3, sections 5(a) and 5(b) of the Product Stewardship Act 2011 and should be made subject to a co-regulatory or mandatory product stewardship arrangement.

Introduction

Grampians Central West Waste and Resource Recovery Group is a Statutory Authority established under Section 49C of the Victorian Environment Protection Act (1970). The organisation commenced operation on the 1st of August 2014 and is one of seven waste and resource recovery groups established under this act. It encompasses 12-member council areas: Ararat, Central Goldfields, Ballarat, Golden Plains, Hepburn, Hindmarsh, Horsham, Moorabool, Northern Grampians, Pyrenees, West Wimmera and Yarriambiack Councils.

GCWWRRG serves as a link between state, local governments, industry and the community. Our Mission is *'To reduce waste and maximise recycling and resource recovery through information sharing, project development and collaborating with local government and industry.'*

In practice, our activities encompass the following:

- Increasing resource recovery rates across our region;
- Facilitation of innovation and research to improve waste management and recycling infrastructure and services;
- Building capacity and promotion of waste and resource recovery best practice for local government, industry and community through education and partnerships;
- Advising on the siting and operation of waste infrastructure and resource recovery facilities by applying statutory and strategic planning expertise;
- Minimising the damage to the environment caused by waste disposal;
- Gathering reliable data to inform current and future waste and resource recovery planning.

Being regionally situated, wastes associated with the agricultural sector are one of our primary concerns. Principal among these are flexible agricultural plastics, that are becoming increasingly common throughout the region.

Flexible agricultural plastics can be defined to include, but are not limited to Silage film, Pit covers, Grain Tubes / Bags, Pallet Wrap, Mulch Film, Dam and Channel Liners, Bunker Liners, Bunker Covers, Cotton Wrap, Bladder Bags, Vine Covers, tubing and Greenhouse Film.

Flexible agricultural plastics in the GCWWRRG region

Due to the types of agriculture undertaken in the GCWWRRG region, grain bags constitute one of the most prominent flexible agricultural plastic types used in the region. Grain bags will be used in this submission as an example of the problems encountered with flexible agricultural plastics.

Single use grain bags are used to store grain in the absence of suitable permanent grain storage facilities, or in response to rapid increased storage demand. The bags are typically three metres in diameter and can range in length up to 150m. They are comprised of three layers of laminated low-density polyethylene, the innermost of which is black to inhibit light damage and insect activity.

Issues associated with flexible agricultural plastics in the GCWWRRG region.

Anecdotal evidence suggests that burning, burying and illegal dumping of grain bags in the region has been a commonplace response to the problem of grain bag disposal, due to the lack of a coordinated and low-cost recovery option for these products.

Grampians Central West Waste & Resource Recovery Group has been working with farmers, the Victorian Farmers Federation, farm suppliers and local government to develop a process for collection and ultimately reprocessing flexible agricultural plastics. To date however, the process has been based on informal, piecemeal agreements, and barriers to the ongoing recycling of flexible agricultural plastics remain, including:

- The lack of an organized recovery program, potentially including on farm pick up.
- The inconvenient / time-consuming nature of cleaning and bundling flexible agricultural plastics, leading to product contaminated with decomposing organic matter, soil, rock etc.
- Resistance by businesses / farmers to transport plastics to centralized collection centres and to pay a gate fee for disposal.
- The suspension of the Plasback Scheme, a voluntary stewardship program which paused operation in mid-2018 due to changes within the plastics recycling industry, and is likely to remain paused for the foreseeable future
- The inconsistency of available volumes of plastic, making collection by potential reprocessors problematic.
- The laminated nature of some flexible agricultural plastics, notably grain bags, making separation and reprocessing problematic.

Current arrangements in place for flexible agricultural plastics in the GCWWRRG region.

Under current arrangements, GCWWRRG has coordinated a collection point at the Warracknabeal Transfer Station for flexible agricultural plastics drop-off. The bags are collected on a regular basis by a plastics manufacturer based in Moama, NSW. The stability of this arrangement over the long term cannot be guaranteed.

Application of product stewardship requirements to flexible agricultural plastics

As the environmental harm associated with flexible agricultural plastics has to date been considered a market externality, the uptake of existing voluntary product recovery mechanisms has been poor.

The application of a product stewardship scheme for manufacturers, importers and distributors of flexible agricultural plastics would serve to correct this deficiency. By introducing a range of market-based instruments, most notably a financial contribution designed to cover the cost of retrieval and decontamination, the flexible plastic pollution issues experienced to date in the GCWWRRG region are likely to be substantially reduced. The requirement for labelling of grain bags and other flexible agricultural plastics should also be considered.

This approach is consistent with the objectives of Strategies 4 and 10 of the 2018 National Waste Policy, and the National Environment Protection (Used Packaging Materials) Measure 2011.

Yours faithfully,

Ms La Vergne Lehmann
Executive Officer