



Dr Ian Overton
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28 February 2023

Dear Dr Overton

Re: Proposed 2023 Single-use and Other Plastic Products amendment regulations

Thank you for the opportunity to provide feedback on the draft regulations, including the proposed exemptions for four (4) additional single-use plastic products under section 6(1)(h) of the *Single-use and Other Plastic Products (Waste Avoidance) Act 2020*.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. Nationally, we have more than 2,000 members from over 500 entities that operate in a broad range of organisations, the three (3) tiers of government, universities, and NGOs.

WMRR's members are involved in the breadth and depth of waste management and resource recovery, engaging in significant activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residual and problematic waste.

WMRR acknowledges that South Australia is a frontrunner in restricting the use of single-use plastics and supports the use of regulation to eliminate single-use items that are essentially waste. Minimising their use will provide benefits in reducing pollution, increasing reuse, and ideally, changing consumer behaviour and improving the quality of materials to be recovered.

Broadly, WMRR supports the government's intent to expand the range of products to come under the single-use plastics ban, noting that Regulation 8 clarifies what are worthwhile and necessary exemptions to what is being proposed. However, WMRR reiterates that the government:

- Consider how it can restrict the design, manufacture and production of these products as well. Nationally, WMRR has been advocating for greater emphasis on avoiding the creation of these products that are essentially waste, at first instance. This requires a stronger focus on design, to eliminate the creation of hard-to recycle and/or single-use materials, as well as supporting and investing in re-use systems. To date we have not seen a focus on re-use. It would be ideal if SA could take its leadership position and utilise it to develop increased re-use opportunities

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from this policy initiative. Avoiding the creation of these types of materials is preferable to managing them at end-of-life.

- Needs to exercise caution in the promotion of alternatives, particularly when they serve to continue to encourage unnecessary consumption, reinforce values of a throw-away society, and create other issues for both the community and environment. Emphasis must be on re-use and re-design.
- Must continue to engage with community and industry through a sustained communications and education program to re-educate and model single-use-free operations at all available opportunity.

WMRR has used the questions posed in the explanatory note to guide our responses, which are addressed in our full submission below. Please do not hesitate to contact the undersigned if you would like to further discuss WMRR's feedback.

Yours sincerely



Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

Annexure A

Submission

<p>1. Plastic pizza savers</p> <p>Are there any issues or potential unintended consequences related to this regulation?</p>	<p>WMRR agrees that this is an unnecessary item and supports the proposal.</p>
<p>2. Plastic stemmed cotton buds</p> <p>Are these regulations appropriate for preventing plastic from ending up in environments? environments?</p> <p>Are there any issues or potential unintended consequences related to this regulation?</p>	<p>WMRR supports the exemptions as they align with other Australian jurisdictions and New Zealand.</p> <p>As per above the note in Regulation 8 that enables these still to be used in testing regimes is sensible and supported.</p>
<p>3.1 Plastic-lined paper plates and bowls</p> <p>Should South Australia address plastic plates and bowls by:</p> <ul style="list-style-type: none"> • providing a time bound exemption these items? • prohibiting the sale, supply or distribution of all disposable plates and bowls that contain plastic, including plastic, including plastic-lined plates? • undertaking an alternative measure not outlined above? <p>Are there any issues or potential unintended consequences related to each of these regulations including any potential impacts on people living with a disability?</p>	<p>WMRR supports the time limited exemption as this aligns with other jurisdictions. WMRR cautions that an unintended consequence of these bans may be an increase in single-use compostable and/or bio-degradable plastic and fibre items which may be counterproductive to SA's desired behavioural change and environmental outcomes as this reinforces the values of a throw-away society.</p> <p>These items could also contain PFAS which poses a risk for the quality and safety of output materials. Placing an additional burden on FOGO infrastructure to deal with an issue that should have been designed out, as well as risk to land and agriculture.</p>
<p>3.2 Plastic-lined paper plates not used for human food consumption</p> <p>Are the proposed exemptions appropriate, and are there any other industries that may require an exemption for single bowls?</p> <p>Are there any issues or potential unintended consequences related to this regulation?</p>	<p>WMRR supports these exemptions.</p>