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Dear Ms Townsend

**Re: Phasing out single-use plastics in the Northern Territory**

Thank you for the opportunity to provide feedback on the *Phasing out single-use plastics in the Northern Territory* discussion paper. 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. With more than 2,000 members from over 500 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and NGOs.

Meeting the 2030 target of 80% resource recovery poses a significant challenge for the NT given the recovery rate across all streams at present is less than 30%, this means that over the next seven (7) years an additional 270,000 tonnes of material needs to be recovered to reach this target in the NT which requires significant infrastructure and investment.

One activity that will contribute to achieving this is a comprehensive strategy for addressing problematic material types (plastic, organics, etc) within the NT. One element of which would be to eliminate all single-use products that can be readily and economically replaced. However, if the NT wishes to drive circularity, the goals of the *Northern Territory's Circular Economy Strategy 2022-2027* and move beyond end-of-life material management the focus should be on design and market creation for secondary raw materials. With an emphasis on first and foremost avoiding the creation of hard-to-recycle materials, followed by creating products that are reusable and made of recycled content and moving away from the use of virgin, non-renewable resources.

WMRR also notes that there is an opportunity for national harmonisation, with several already developed single use plastics plans in other jurisdictions. Consistency and robust processes are critical given that Australia is a significant importer and many stakeholders across the supply chain operate national networks. WMRR's responses to the consultation questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

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Gayle Sloan

**Chief Executive Officer**

Waste Management and Resource Recovery Association of Australia

## Annexure A

### Submission:

<p><b>5.2. What about degradable, biodegradable plastics?</b></p> <p><b>What is your view on biodegradable plastics in the Northern Territory?</b></p> <p><b>Do you compost at home?</b></p> <p><b>Would you like more educational materials on which alternatives can be composted at home?</b></p>	<p>While the ideal solution is to avoid the creation of waste at first instance which is effectively what single use items are, WMRR recognises that this is not entirely feasible in all instances given the role that packaging can play in food safety and health care for example.</p> <p>The goal of the scheme must be to not simply replace one single use item with another, rather to focus on avoidance or creating re-use systems that enable the elimination of single use. No scheme in Australia as yet has done this well, which potentially presents an opportunity for the NT. Without active support for avoidance initiatives single-use non-plastic alternatives will likely fill the demand gap and require their own forms of recycling and waste management. Currently there is not infrastructure at scale, in the NT, for biodegradeable plastics.</p> <p>Further, the differentiation between bio-plastic and plastic poses contamination risks for current recycling in the NT. Significant public education and compliance monitoring will be needed.</p> <p>The NT should take a consistent approach to plastics and focus on avoiding use of them where feasible, supporting higher order re-use systems to replace their use and not looking to utilise compostable plastics given there is both not the infrastructure for it in the NT and the presence of plastic creates a real challenge in demonstrating beneficial re-use when included in compost. Emphasis must be placed when plastic is considered necessary. on using recyclable high value plastic polymers that have existing infrastructure in place to collect, sort and recover.</p> <p>The NT must engage with community and industry through a sustained communications and education program to re-educate and model single-use-free operations at all available opportunities.</p>
<p><b>8. A circular economy approach to plastics</b></p>	<p>The main message for the NT to highlight with the community in a circular approach when implementing this policy is avoidance. Which needs a comprehensive and well-</p>

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<p><b>Have you already reduced your consumption or supply of single-use plastics? If yes, what have you done and what have you learned? If no, what is stopping you or your business from doing so?</b></p>	<p>resourced behavioural change campaign for the NT including clear alternatives to enable avoiding single use items (eg reuse coffee cups as opposed to single use, boomerang bags instead of plastic). As such as every single use item is eliminated, the clear re-use alternatives need to be educated on and made available.</p> <p>Campaigns will also need to be in plain language and in Language.</p>
<p><b>9. Considerations for the Northern Territory</b></p> <p><b>What needs to be considered when phasing out single-use plastics in the Territory?</b></p> <p><b>What are the costs and other impacts to business and organisations?</b></p> <p><b>What impacts will the phase out have on remote businesses and communities?</b></p> <p><b>What information do businesses and the community need to support a transition from single-use plastics?</b></p> <p><b>Which members of our community may be adversely impacted and what are the solutions?</b></p>	<p>WMRR notes that there may be a short-term economic impact for businesses as they source alternatives however, given that the NT's ban is coming after many other jurisdictions, ideally a number of other alternatives will have been sourced and readily available.</p> <p>A number of impacts on people with special needs and remote and regional communities (including businesses) have already been considered and addressed in other jurisdictions, eg accessing straws in a health care facility, and we would advocate that the NT canvas these solutions with both other states and the National Retailers Association who have been integral to rolling this policy out in other Australian jurisdictions.</p>
<p><b>10. Proposed items to phase out</b></p> <p><b>Which single-use items do you think need to be phased out in the Territory? Why?</b></p> <p><b>Are there any items on Table 2 or Table 3 that should not be phased out? Why?</b></p> <p><b>What cost or other impacts need to be considered in a phase out of these identified items?</b></p>	<p>WMRR would encourage the government to work with all jurisdictions that have implemented/are implementing similar bans to ensure a nationally harmonised approach to single-use plastics, including the types of plastics to be banned, exemptions, education, and the caution around alternatives. To support national alignment WMRR cautions banning items that are not identified in Table 1 of the paper.</p>

<b>What other alternatives are available? What, if any, are the barriers to these alternatives?</b>	
<b>11. What are the policy options?</b>  <b>Which policy tool/s should the NT Government use to phase out single-use plastics?</b>	<p>WMRR encourages the NT to set government procurement targets for SUPs and other single use items at all levels of government.</p> <p>As already stated, WMRR is always supportive of educational and behavioural change campaigns.</p> <p>In general, WMRR advocates for extended producer responsibility/product stewardship schemes and design standards however as there are already alternatives for many of the suggested single use items legislative and regulatory bans are recommended and this also aligns with SUP bans in other jurisdictions.</p>
<b>12.5 Next steps</b>  <b>How much lead-time do businesses need to prepare for the phase out?</b>	WMRR would suggest at least a six (6) month transition period.
<b>12.6 Measuring success</b>  <b>What is the best way to measure success?</b>	WMRR encourages the NT to incorporate circular economy principles and detailed higher order waste management hierarchy points into the desired outcomes. Benefits to consider include: reducing pollution, increasing avoidance and reuse for the producer and consumer, changing consumer behaviour and improving the quality of materials to be recovered and increased use of recycled material.