



The Plastics, Packaging and Marine Plastic Debris Team
Department of Agriculture, Water and the Environment
Waste Policy and Packaging Branch – Environment Protection Division
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CANBERRA ACT 2601

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19 October 2021

Dear Sir/Madam

Re: Global agreement on marine plastic litter and plastic pollution – consultation paper

The Waste Management and Resource Recovery Association of Australia (WMRR) welcomes the opportunity to provide feedback on the department's Global agreement on marine plastic litter and plastic pollution: consultation paper.

WMRR is the national peak body for all stakeholders in Australia's \$15.5 billion waste and resource recovery (WARR) industry, and we have more than 2,000 members from over 500 entities across the nation from business 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 waste. Our purpose is to lead the success of the industry while ensuring that the environment and community are protected through the safe and responsible management of waste and resources.

WMRR commends the federal government for joining in the call for a new global agreement on marine litter and plastic pollution and supports comprehensive and coordinated global action to address plastic pollution. We also acknowledge the ongoing efforts of both federal and state governments to-date in tackling plastic pollution, as well as attempts to create a less wasteful society through the National Waste Policy, National Waste Action Plan, National Plastics Plan, and other state/territory-based WARR strategies and policies, including single-use plastics bans that have been, or are in the process of being rolled out across jurisdictions.

The challenge of marine litter and plastic pollution, and the issues that these have created in the environment, do not originate from the WARR sector but rather, stems from the start of the supply chain - that of product design and manufacture. Notably, a significant proportion of plastic waste and pollution is packaging; packaging was responsible for 46% of the world's total plastic waste in 2018¹. WMRR supports the proposal for a global agreement to tackle existing marine pollution and litter

¹ Roland Geyer (2020); New unpublished data retrieved from UNEP; Basel Convention Plastic Waste Partnership (2020); The Business Case for a UN Treaty on Plastic Pollution – WWF, Ellen MacArthur Foundation, BCG Consulting Group.

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caused by end-of-life products that are already in the community and environment, as well as products that are continuing to be produced and consumed, and broadly, we agree with the principles, scope, and goal articulated in the consultation paper. However, we would urge governments around the world, including Australia, to not lose sight of the bigger picture that will drive long-term generational change and enable a circular economy – that of designing out waste and pollution in the first instance. Given waste is the direct result of poor design, it is imperative that decisions are made at the design stage to select materials and eliminate pollution; these are also the decisions that will play a significant role in driving reuse, repair, recycling, remanufacturing, and creating a circular economy.

Thus, while this global agreement is supported, there is an opportunity, as Australia finalises its national position ahead of the UN Environment Assembly Session in February/March 2022, for the federal government to take a leading role in advocating for a complementary global agreement that would drive genuine systemic change in the packaging supply chain, one that includes environmental design requirements similar to those in the European Union. In addition to the myriad benefits of rethinking packaging design, the lengthy timeframes in finalising the agreement (noting that detailed negotiations and consultations will continue in February 2023 and beyond) emphasises the importance of capturing this opportunity so that the supply chain can, in parallel over the next few years, develop more sustainable products and processes while existing waste and pollution is being managed.

WMRR is encouraging the government to consider how it can develop a holistic agreement that drives an international legal instrument for genuine sustainable packaging design and sets global goals and targets to complement existing voluntary actions globally to ensure that plastic never becomes waste or pollution. In Australia, that would mean developing a regulated extended producer responsibility (EPR) scheme under the federal *Product Stewardship Act* for packaging material, regulating design standards to end the use of composite, problematic, and single-use products, and to develop incentives and stipulations for manufacturers to use Australian recycled product.

Globally, Australia should advocate for the take-up of the UK's New Plastics Economy which includes the Plastic Pact. The New Plastics Economy already has more than 1,000 participating organisations, many of which operate globally and export products around the world. They also include companies representing 20% of all plastic packaging produced globally². These organisations, alongside governments, industry associations, NGOs, universities, investors and more, are involved in cross-value chain collaboration to drive a systemic shift where the emphasis is no longer on downstream solutions, but rather, on action and innovation that will change the way we design, use, and reuse plastic with the overarching goal of plastic never becoming a waste or pollution. A complementary global agreement on designing out waste that includes design standards and collaboration actions (though the adoption of the New Plastics Economy) is more than half the battle won for the community and environment.

WMRR would also make the following recommendations:

² The New Plastics Economy, Ellen MacArthur Foundation.



- Targets: while it is up to each country to set out national targets and action plans to drive these, the global agreement could stipulate specific requirements for, or limitations on, materials such as single-use plastic products, consistent labelling requirements, and potential targets related to waste discharged into oceans. There is also an opportunity for governments to agree to harmonised definitions (including what constitutes recyclable, reusable, single-use, and more) and standards used in both the design and manufacturing of plastic products, to be applied across the plastic value chain. This is not a novel idea as there already are in existence, binding international agreements such as the Basel Convention and Kyoto Protocol.
- Monitoring and reporting: there are to-date, no consistent plastic monitoring metrics across countries, which poses challenges for organisations to demonstrate the success of their investments in sustainable material use/management. Even the UN Principles for Responsible Investment recognises the need for standard definitions in order to understand, report, interpret and monitor data. It would be a worthwhile and necessary endeavour for countries to agree on global reporting metrics and methodologies that could be reviewed by an intergovernmental scientific review panel, and for countries that sign the agreement to commit to producing regular national reports to ensure transparency and accountability.

WMRR welcomes the opportunity for continued engagement as negotiations proceed. Please do not hesitate to contact the undersigned if you would like to further discuss WMRR's submission.

Yours sincerely

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Chief Executive Officer

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