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Dear Mr Chappel

Re: *NSW Plastics: The Way Forward*

Thank you for the opportunity to provide feedback on *NSW Plastics: The Way Forward*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$17 billion waste and resource recovery (WARR) industry. With more than 2,300 members from over 410 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. In NSW, WMRR represents over 750 individual members from more than 130 entities. The state generates 25.9 million tonnes of waste each year with a resource recovery rate of 67% delivering an economic value of \$5.31 billion employing 14,570 people.

As fierce proponents of the resource and waste management hierarchy, WMRR advocates for beyond end-of-life material management and the reinvestment of valuable resources back into the economy in order that less can be used for longer. Currently, NSW generates nearly 900,000 tonnes of plastic waste every year, with around 90% being sent to landfill. NSW must move from the existing linear supply chain model that creates plastic waste, to a circular economy that designs out plastic waste and pollution, promotes and supports the circulation of resources for as long as possible, and reduces reliance on virgin materials.

In WMRR's view, urgent action needs to be taken so that plastic waste is avoided, and the existing barriers to the recovery and reinvestment back into the economy of plastic materials are removed. However, we also believe caution needs to be exercised with regard to the promotion of plastic 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 avoidance, re-design and re-use.

The NSW Plastics: The Way Forward action plan proposes new initiatives including:

- phasing out items like plastic lollipop sticks, pizza savers and food tags for bread, bakery and pantry items

- bringing NSW into line with other states and phasing out the release of lighter-than-air balloons as well as the supply of plastic balloon sticks, clips and ties
- introducing design standards for single-use plastic cups, food containers and their lids to ensure they are easily recyclable
- phasing out the supply of unnecessary plastic barrier bags.

WMRR applauds the proposed timeframes in *NSW Plastics: The Way Forward*, noting that many actions have implementation by the end of 2025 and 2027 and the remainder by the end of 2030. WMRR notes that many of the actions include initiatives that not only ban items, but also which impart requirements to improve plastic recyclability, improve labelling and place requirements for harmful contaminants to be removed from plastic materials.

Whilst it is WMRR's view that a nationally consistent system funded by generators, which mandates circular labelling, product design, recovery and reinvestment of materials is required to ensure the recovery at scale of these valuable materials, it is also our view that NSW is the most likely jurisdiction to take leadership of this much needed reform – noting that plastics manufacturers will likely need to make changes across their national product supply chains to ensure ongoing compliance with integral NSW markets. It is hoped that the swift action of the NSW Government will drive national alignment with mirror regulations and legislation in other Australian jurisdictions put in place to create a circular economy within Australia that designs out plastic waste and reinvests recyclable plastic materials within Australian supply chains.

Furthermore, WMRR notes that the items contained within the action plan are predominantly focused on food packaging (plastic and non-plastic) and notes the connection between the NSW Plastics plan and the introduction of mandatory FOGO kerbside collections by 2030. The interplay between these initiatives is to be commended – noting the real risks posed by emerging contaminants of plastics and plastic alternatives, as well as chemicals of concern, in food packaging entering the FOGO streams.

WMRR stresses the point that the protection of the safety and quality of organic outputs must be kept front of mind and has consequently made comments in this submission discouraging the use of voluntary labelling schemes and the use of 'compostable packaging'. Although well meaning, it is WMRR's view – and a view that can be evidenced by existing voluntary initiatives - that without enforceable requirements, these initiatives simply enable free-riders and misleading marketing messages to confuse consumers, add cost to business and contaminate the organics stream. Rather than look to provide plastic alternatives, efforts must be directed to avoiding their use in the first instance, and if that is not possible, placing responsibility squarely on the manufacturers of plastic products to design for circularity and safety. It is a theme throughout our submission that legally binding requirements on plastics manufacturers will be crucial to stimulate the investment and innovation essential to driving change.

WMRR has made specific comments against each of the proposed action items within *NSW Plastics: The Way Forward* (provided in **Annexure A**), however we provide the following general comments for the NSW EPA's consideration.

i. Responsibility for plastic waste must be placed on plastic manufacturers

WMRR encourages government to take steps that squarely place responsibility on producers of waste materials to take responsibility for and manage the waste they create. This is integral to transitioning to a circular economy as it places direct pressure on brands to stimulate the investment and innovation in avoiding the creation of plastic waste so that it does not end up in the environment. WMRR is heartened to see that NSW has specific action items to ensure that public litter data is attributed to the specific brands responsible for creating that litter. This transparency and liability are exactly what is required to shift the dial and start placing responsibility for the safety and suitability of resources on the producers that make the products entering our circular economy in the first place. Such measures reinforce the paradigm shift to placing responsibilities squarely on the producers of waste to take actions to avoid it in the first place, rather than enabling the costs to be passed on to the next in the value chain.

At present there is strong vested interest for manufacturers of plastics to continue with the status quo. For this reason, many of our specific comments pertain to ensuring that the action items place clear liability on plastics producers and that possibilities for misleading marketing and free-riding (such as voluntary schemes and standards) are outright avoided.

ii. Focus must always be on designing out waste in the first instance, which necessitates avoiding potential harmful contaminants in plastics and non-plastic alternatives.

WMRR strongly supports the precautionary approach to harmful chemicals in plastic and non-plastic food packaging taken by the EPA and welcomes the publication of a green and red list of permitted chemicals being developed by the end of 2027. Clearly placing the obligation on producers to ensure that materials and products they place on the market meet safety and quality thresholds to begin with, rather than placing the burden of emerging contaminants on the WARR sector to manage through decontamination and disposal, is integral to the success of ongoing circularity.

By the same reasoning, WMRR encourages caution in considering the implementation of compostable stickers on fruit – noting that this action is slated for 2030. Whilst this action aligns with South Australia's approach, there are concerns around the use of undesirable alternative products, including 'compostable' products, particularly where they may pose a real risk of contamination through use of chemical additives. Given the transition of NSW to FOGO collections by 2030, it would be prudent to minimise the risk of contamination of the valuable organics stream in so far as possible with a view to restricting any material that is not food or organics from entering the stream in so far as possible. This logic is backed by the EPA's "*What's the Go with FOGO*" research which highlighted the need for better quality control of what ends up in the green-lid bin and better removal of physical contaminants before processing. That report indicated that chemical contaminants ended up in composts and could be traced back to seemingly 'innocent scope creep' in the materials accepted as inputs in kerbside collections. Put plainly, WMRR believes that the use of compostable stickers is a potential 'scope creep' and should be avoided.

Furthermore, there is also the potential for the compostable packaging manufacturers to see this allowance of compostable fruit stickers as a justifiable rationale for the broader suitability of compostable packaging. Waste management hierarchy principles dictate that composting should never be preferenced over avoidance, re-use or recycling. Given there is a five (5) year timeframe against the implementation of this action item, WMRR urges the NSW EPA to consider other



alternatives to fruit stickers (such as laser labelling which may be more readily available by 2030) rather than committing to compostable stickers – to avoid the contamination risk of the organics stream

iii. NSW can lead the way for Australia's urgently needed plastics reform

It is WMRR's view that there is a real opportunity for NSW to lead the way on plastic packaging reform. *NSW Plastics: The Way Forward* provides an excellent action plan to reduce plastic use and promote its recycling within NSW and WMRR commends the NSW EPA's intentions to coordinate its efforts with national frameworks, such as the rollout of Australia's packaging design guidelines and national packaging reforms to coincide in so far as possible.

However, national efforts to reform the packaging regime have been slow moving. The existing national co-regulatory framework for packaging (being the National Environment Protection (Used Packaging Materials) (NEPM) Measure as administered by the Australian Packaging Covenant Organisation (APCO) has operated as an ineffective voluntary stewardship initiative that has created a lack of clarity for brand owners regarding their liability and obligations, enabled free riders, reduced industry confidence and participation and resulted in little or no data collection to measure and report on performance. It has failed to meet the 2025 targets of having 100% of packaging being reusable, recyclable or compostable, 70% of plastic packaging being recycled or composted, 50% of average recycled content included in packaging and the phase out of problematic and unnecessary single-use plastic packaging.

WMRR is hopeful that by taking a strong stance on plastics regulation and legislation in NSW, that other Australian jurisdictions will follow suit and align with NSW as soon as practicable. For optimisation of circularity, WMRR continues to strongly advocate that a national 'waste directives' systemic approach to all products and waste materials in Australia – similar to that in place by the EU - would support state based (aligned) regulations. The current lack of a directives framework results in producers having to comply with potentially multiple scheme coordinators (e.g. APCO and Paintback) which is both confusing and costly, and has resulted in an ad hoc 'product by product' approach, which is lengthy and time consuming and fails to establish the higher order system for all in the value chain, including those that import.

WMRR is hopeful that the NSW stance on plastics will propel Australia towards more urgent action to regulate and legislate for plastic materials to be circular by design and in practice as a valuable resource reinvested into Australia's circular economy.

iv. Recommendation for NSW to act independently of APCO and the Australasian Recycling Label

As aforementioned, it is WMRR's firm view that mandatory design and labelling requirements for all packaging – including plastic items – are necessary to avoid greenwashing, business expense and consumer confusion (as well as mitigate opportunities for the contamination of our plastic recycling streams). Mandated design and labelling requirements also complement interrelated circular policy and regulatory measures such as minimum local recycled content thresholds and assurance of safety and quality standards. To have real effect and impact on manufacturers of plastic products, these requirements must be legislated and enforced.



Thus, WMRR does not support the inclusion of actions that invoke the specific use of the Australasian Recycling Label (ARL). The ARL is a voluntary labelling standard, administered by APCO, that has resulted in opportunistic marketers making similar but misleading 'recyclable' claims to confuse consumers, particularly with regard to 'green' messaging pertaining to plastics containing pro-degradant additives. Further the 'test' on which it relies (accepted by 80% of local government areas) is inappropriate given this does not meet green claims requirements under ACCC and fails to address the packaging that is utilised in commercial environments.

WMRR does not support the existing co-regulatory regime with APCO and is seeking national packaging reforms inclusive of mandatory packaging design and labelling requirements along with a properly scoped mandatory EPR scheme. APCO's lack of success to effect change in its many years of operation, points to the reality that placing legal and financial responsibility on plastics manufacturers to engrain circular thinking across their products' lifecycles is crucial. Therefore, WMRR seeks to remove the reference to the ARL and instead include wording that is supportive of national design and labelling mandates that require recyclability to clearly be placed on both plastic and non-plastic packaging materials.

WMRR reiterates its broad support the actions proposed by *NSW Plastics: The Way Forward* and commends the NSW EPA for taking strong action on this crucial issue. We are hopeful that the proposed actions will have a significant impact on decreasing the amount of plastic waste sent to landfill, resulting in improved recovery and reinvestment of plastic materials within NSW, and promoting the further expansion of the NSW Plastics plan to other plastic packaging for consumer products. WMRR's comments against each of the proposed action items can be found at **Annexure A**. Please don't hesitate to contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

WMRR's comments on NSW Plastics: The Way Forward Action Items:

Item	Action	Timeframe	WMRR Comments
Reducing Plastic Litter			
Single-use plastic cups	- Require food service venues such as fast-food restaurants and cafes to accept reusable cups for takeaway hot and cold beverages. - Trial reusable cups in government premises such as buildings, venues and stadiums across NSW - Develop reuse 'toolkits' for transforming existing locations and new developments into reuse-only precincts - Introduce a design standard requiring single use cups for cold beverages and their lids to be recyclable - Introduce mandatory design standards requiring an anti-littering label and the Australasian Recycling Label on single-use cups for hot and cold beverages, supported by a behaviour change campaign	By end 2027	WMRR firmly supports all regulatory measures to enforce reuse of materials so far as possible by food service venues, and the development of reuse-only precincts. This is an obvious step towards changing the behaviours of the community to avoid the creation of unnecessary plastic waste. In terms of design standards for packaging materials including single use cups for cold beverages and their lids, WMRR urges national alignment to be sought and is strongly supportive of the national implementation of mandatory packaging design and labelling requirements. If this is something that NSW can act upon by 2027, WMRR would seek to have mirror legislation implemented by other Australian jurisdictions. It is WMRR's firm belief that the existing voluntary co-regulatory national packaging regime should be replaced with mandatory national packaging design and label requirements and a comprehensive mandatory extended producer responsibility scheme (EPR) for packaging manufacturers. This obviously extends to producers of single use cups. With this in mind, WMRR does not support the continuation of the Australasian Recycling Label (ARL) on single use cups and beverages, and instead would seek to have this action point revised to remove the reference to the ARL and instead include wording that is supportive of national design and labelling mandates that require recyclability to clearly be placed on packaging. (<i>ie: Recycle this cup via your yellow bin or CDS</i>)

Item	Action	Timeframe	WMRR Comments
	Explore expanding Return and Earn to accept single use plastic cups for cold beverages	From 2030	WMRR welcomes opportunities to expand existing collection infrastructure to collect recyclable plastic materials, including single use plastic cups. Using existing incentivised CDS collection systems could provide consistency and clarity for consumers, promotes the effective source separation of recyclable plastic materials and to date. The Return and Earn scheme has demonstrated success in incentivising consumer recycling and reducing littering of plastics. It follows that expanding the scheme to include single use cups could result in increased volumes of these valuable plastic materials being collected for their successful reinvestment into the circular economy. However, if the goal is to eliminate single use items- why would there be an attempt to find pathways to recover them? It sends a mixed and confusing message to the community. We query both the rationale for doing so and the ongoing financial viability of such an initiative and would suggest that only re-use cups be considered for take back.
Single-use plastic beverage bottle lids	- Introduce a design standard requiring plastic lids to be 'tethered' or attached to Return and Earn-eligible plastic bottles below 600 ml - Work with other states and territories to ensure container deposit schemes across Australia accept plastic bottle lids, including tethered lids	From 2030	NSW is in the position of having established Return and Earn infrastructure widely available, and well utilised by consumers. WMRR is encouraged by the action item to look at product design standards requiring 600ml bottle lids to be tethered so as to ensure recovery of these across collection refund schemes like Return and Earn, noting that leadership in mandating product design standards for plastic products is urgently needed. We would argue however that it is not simply tethering the lid, but also requiring that the lid be the same polymer of the bottle to enable easier recovery.

Item	Action	Timeframe	WMRR Comments
			WMRR supports actions that look to align jurisdictions' collection and recycling regimes and encourages working with other state CDS schemes to ensure a nationally consistent approach.
Single-use plastic bowls with lids and food containers	- Introduce a design standard requiring single-use plastic food containers and their lids to be recyclable - Introduce mandatory design standards requiring an anti-littering label and the Australasian Recycling Label on single-use plastic food containers, supported by a behaviour change campaign	By end 2027	WMRR strongly encourages action items which look to introduce design standards requiring single use plastic items to be recyclable. It is important however that we have a real definition of recyclable, it cannot be 'technically' recyclable (as per what APCO appears to revert to), but rather actually recyclable as per ACCC green claims requirements. This means that the item must be able to both be placed in a stream to deliver it to the correct processing facility, but also given export restrictions, there must also be the ability to recover through actual remanufacturing facilities - of which there remains a significant shortfall of in Australia. As noted in our cover letter, given national supply chains for plastic manufacturers, it is anticipated that NSW mandated requirements will flow to all Australian product supplies due to market economies of mass production (if not through mirror regulation in other states or federal mandates). However, as noted above, WMRR does not endorse the use of the Australasian Recycling Label (a voluntary standard) and instead seeks that product design and labelling requirements are mandatory and enforceable so as to minimise opportunities for free-riders, greenwashing, consumer confusion and to protect the practical recyclability of plastic lids and bowls within Australian supply chains. Design standards and labels need to be imposed under a circular economy model for plastics. That label must provide assurance that a product meets requisite safety, quality and recyclability standards. To ensure that materials are recyclable in practice and that they can

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			partake meaningfully as part of Australia's circular supply chains, steps must be taken to ensure there is no room for confusion as there is currently with the voluntary ARL scheme.
	Explore expanding Return and Earn to accept single use plastic food containers.	From 2030	As noted above, using existing incentivised CDS collection systems provides consistency and clarity for consumers, promotes the effective source separation of recycleable plastic materials and to date, Return and Earn has demonstrated success in incentivising consumer recycling and reducing the littering of plastics. However, we would not support this unless it was for re-use containers due to the confusion that it creates and query the long-term economic viability of such a proposal when the goal is to design out.
Single-serve condiment packaging	- Introduce a design standard requiring single-serve condiment packages to have a standardised anti-littering label and the Australasian Recycling Label - Require takeaway food service businesses to display anti-litter messaging in their shopfronts	By end 2027	WMRR supports all behavioural change messaging for consumers such as anti-littering signage at takeaway food outlets. WMRR also supports design standards – but as noted earlier, encourages the use of mandatory design and labelling standards rather than the voluntary ARL scheme, noting that without enforceability, (voluntary) labelling schemes enable misleading marketing claims to be made that can confuse consumers and corrupt recycling outcomes.
	Require single-serve condiment packages to be recyclable and accepted in material recovery facilities in five years, in line with a co-designed roadmap for making single-serve condiment packages circular by 2030.	From 2030	WMRR queries whether this is practicable given the size of the packaging for condiments which is unlikely to be able to be captured in existing MRF infrastructure given size of screens used. The goal must be to move to avoidance or reuse, and not requiring infrastructure at scale to adapt to small-scale poorly designed items that should be designed out.
Plastic lollipop sticks	Phase out the supply of single-use plastic lollipop sticks	By end 2025	WMRR strongly support the designing out of waste, such as single use plastic lollipop sticks.

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Cigarette butts	Collaborate with the Commonwealth Government and other Australian states and territories on a national approach to regulating cigarette butts	By end 2027	WMRR strongly urges national alignment and agreement across states and territories to ensure that action is taken to regulate against the creation of all waste and litter. WMRR notes that federal initiatives have traditionally been slow moving and is supportive of NSW taking leadership of this issue. We also note that there is a larger issue in 2024 - the littering of vapes - which requires urgent action.
Using our litter data	- Explore ways to make the way we report our litter data more transparent, including publishing the brand data of littered items - Consider requiring the brand owners of highly littered plastic items to set litter reduction targets	By end 2025	WMRR encourages government to take steps that squarely place responsibility on producers of waste materials to take financial responsibility for and manage the waste they create. This is integral to transitioning to a circular economy as it places direct pressure on brands to stimulate the investment and innovation in avoiding the creation of plastic waste so that it does not end up in the environment. Part of the solution must be the funding of public place infrastructure and collection services to address the litter - only once there are real consequences will we arguably see the emphasis on design required.
Reducing harmful chemicals in plastics and microplastics			
Harmful chemicals in packaging	- Develop and publish a 'green list' of chemicals that are permitted in plastic and non-plastic food packaging below certain tolerable risk thresholds - Develop and publish a 'red list' of chemicals that are proposed to be phased out of plastic and non-plastic food packaging supplied in NSW within specified time frames.	By end 2027	WMRR strongly supports the precautionary approach to harmful chemicals being taken by NSW EPA and would encourage leadership on this issue nationally. It will not be possible to reach stated recovery targets (in any area) with the ongoing inclusion of chemicals such as PFAS in products readily sold in Australia and they must be designed out as a matter of priority, noting that we believe the iCHEMS response that commences mid 2025 is insufficient given the number of chemicals

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	- Introduce a voluntary chemical certification and labelling scheme for plastic and non-plastic food packaging - Provide support for increased chemical testing capacity for packaging		and the lack of consumer awareness (eg labelling) that this scheme provides. If an economy is to be truly circular, then there must be baseline requirements (set by mandatory sustainable product design requirements) to ensure the circularity of materials within it. It is WMRR's view that chemical requirements should be included within the federal mandate for packaging design and labelling requirements. As per our previous comments in relation to the ARL, it is WMRR's view that voluntary schemes are ineffective and that enforceability is needed if we are serious about designing out plastic waste. Voluntary schemes – although well meaning – merely add costs to compliant organisations, and enable marketing opportunists to make misleading claims that will confuse consumers, as happened with the ARL and the greenwashing efforts from products that claimed to be 'partially' compostable, recyclable and degradable etc.
	Work with the Commonwealth Government to mandate the certification and labelling scheme in five years	From 2030	WMRR urges the implementation of a national mandatory labelling scheme, and if this cannot be attained, urges efforts to focus on national alignment between the states and territories. A cohesive regulatory approach across all jurisdictions will best enable Australia to transition to circular design and markets for plastic products.
Plastics containing prodegradant additives	Phase out the supply of plastics containing pro-degradant additives, such as oxo-, photo-, and landfill degradable plastics, that do not meet	By end 2025	One of WMRR's key concern relating to the phase out of single-use plastics relates to the potential for "greenwashing" of consumers. Such concerns are raised in the Discussion Paper around the misleading nature of alternative plastics (including compostable, degradable or fragmentable, biodegradable, oxydegradable and bio-

Item	Action	Timeframe	WMRR Comments
	relevant compostable standards or other certification requirements		based plastics), and the emerging contaminants which could undermine the creation of a circular economy in NSW. Removing the jargon and banning all categories of single use items would be prudent (and hence we query why we would collect these through the Return and Earn scheme) as these terms cause further consumer confusion about how these materials are treated by the WARR industry. This is especially the case for 'compostable' products. Unless a product is certified as commercially compostable under AS4736, it does not break down to the extent required in a WARR facility in order to be considered safe for the environment and human health. Furthermore, WMRR understands that even with this label there is no guarantee that it is PFAS free as the PFAS is not measured, rather there is a fluorine proxy number attributed. As such WMRR does not support the use of 'compostable' alternatives given both the confusion they create and the risk that they pose. The WARR industry is already taking steps to maintain high product quality standards, and this should not be compromised by lax regulatory settings for packaging manufacturers. At a time when governments are increasingly concerned about emerging contaminants such as microplastics and PFAS "forever chemicals", it is common sense to stop these products from entering the circular economy and ensure that all plastic products – including the alternative and compostable plastics – are phased out.
Plastic microfibres released by washing	Introduce a design standard requiring all new washing machines to have a rating against a minimum	By end 2027	WMRR supports this initiative.

Item	Action	Timeframe	WMRR Comments
synthetic textiles	performance standard for their ability to capture and reduce microfibres.		
Plastic microbeads in all cleaning products	Phase out plastic microbeads from all cleaning products	By end 2025	WMRR supports initiatives that remove emerging contaminants including microplastics from the environment.
Keeping pace on plastics action			
Heavyweight plastic film shopping bags	- Adopt Queensland's approach through a design standard requiring heavyweight plastic film shopping bags to meet certain reuse and recycled content standards. - Only allow shopping bags made of plastic to be readily available at the point of purchase if they are clearly designed for reuse or are part of an extended producer responsibility scheme for plastic recycling. - All other plastic shopping bags will be required to be stored out of sight and only provided on request.	By end 2025	WMRR supports and commends actions that promote the swift alignment between Australian jurisdictions with regard to the management of shopping bags.
	Introduce a design standard requiring plastic shopping bags to have a standardised anti-littering label and the Australasian Recycling Label.	By end 2027	As mentioned throughout this submission, WMRR is supportive of design and labelling standards being implemented but firmly believes that these must be enforceable. In our view voluntary standards such as the ARL do not work and have historically enabled free -riders and confusing marketing messages to appear on labelling. Further as

Item	Action	Timeframe	WMRR Comments
	Introduce a design standard to eliminate harmful chemicals from plastic shopping bags		mentioned above the ARL does not meet ACCC requirements and NSW should not be promoting it.
Plastic barrier bags	- Phase out the supply of unnecessary plastic barrier bags that have safe alternatives available, such as barrier bags for umbrellas - Introduce a design standard requiring plastic barrier bags to have a standardised anti-littering label and the Australasian Recycling Label - Introduce a design standard to eliminate harmful chemicals from plastic barrier bags	By end 2027	WMRR completely supports all phase outs of unnecessary plastic items and sees this as a crucial step to design out plastic waste. Again, WMRR warns against the use of voluntary standards such as the ARL and urges NSW to take the lead on enforceable design and labelling standards – anticipating that the market presence of NSW will encourage Australian supply chains to design all products intended for Australian markets to be designed to meet the NSW standard.
Balloon releases	Phase out the release of lighter-than-air balloons	By end 2025	WMRR strongly supports all initiatives to phase out unnecessary plastic waste entering the environment. Phasing out balloon releases as soon as practicable is encouraged.
Balloon accessory items	Adopt South Australia’s approach to phase out supply of plastic balloon sticks, clips and ties	By end 2025	WMRR strongly supports all initiatives to phase out unnecessary plastic waste entering the environment and encourages initiatives that bring NSW into alignment with actions already taken by other jurisdictions.
Expanded plastic packaging	Adopt Western Australia’s approach of phasing out supply of food trays, loose-fill packaging, and moulded or cut packaging made wholly or partly of any form of expanded and foamed plastic	By end 2025	As noted above, WMRR strongly supports all initiatives to phase out unnecessary plastic waste entering the environment and encourages initiatives that bring NSW into alignment with actions already taken by other jurisdictions, assuming that there are readily available, economically viable alternatives. Key to this is not (like WA) requiring alternatives such as “compostable” packaging that create other problems for industry.

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Fruit stickers	Introduce a design standard requiring fruit and vegetable stickers and their adhesives to be certified compostable	From 2030	WMRR strongly argues against introducing “compostable” items to replace plastic items, and instead encourages the consideration of other alternatives (such as laser labelling for fruit). As discussed in the submission letter, research by the NSW EPA has demonstrated that scope creep of ‘compostable items’ into organics has increased chemical and physical contamination, and given the transition to mandatory FOGO, there is a growing market interest in developing compostable products. There is a real risk that one compostable item allowed can encourage further compostable items to enter the FOGO stream, and this is something that should be avoided as a matter of priority. Protecting the quality of organics output products should be the primary concern rather than the replacement of plastic – and WMRR holds concerns that we may simply be replacing a plastic waste with another item that can contaminate compostable streams. WMRR encourages the EPA to consider other alternatives rather than commit to this specific action point to introduce compostable labels, particularly given the action timeframe is 2030, and there is potential to innovate further in this area.
Plastic pizza savers	Phase out supply of plastic pizza savers	By end 2025	As noted above, WMRR strongly supports all initiatives to phase out unnecessary plastic waste entering the environment.
Plastic food-bag tags	- Phase out supply of plastic tags for bread, bakery and dry pantry items. - Plastic tags for produce bags will be temporarily exempt from phase-out until end 2029	By end 2025	As noted above, WMRR strongly supports all initiatives to phase out unnecessary plastic waste entering the environment.