



Mr Hugh Christie  
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By Email: [PlasticsPolicy@nre.tas.gov.au](mailto:PlasticsPolicy@nre.tas.gov.au)

1 October 2024

Dear Mr Christie

**Re: Phasing out Problematic Single-Use Plastics in Tasmania**

Thank you for the opportunity to provide feedback on the *Phasing out Problematic Single-Use Plastics in Tasmania* Discussion Paper ("Discussion Paper"). 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 2,290 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 Tasmania, WMRR represents over 60 individual members from more than a dozen entities. The state generates 900,000 tonnes of waste each year with a resource recovery rate of 51% delivering an economic value of \$147 million and employing 1,150 Tasmanians.

The Department of Natural Resource and Environment (NRE) is seeking feedback from stakeholders in response to the Discussion Paper to better understand how restricting access to some single-use plastics will impact Tasmanians. In accordance with the *National Plastics Plan 2021*, Tasmania will mandate the phase out of certain single-use items and materials, targeting the commercial sale and supply of single-use plastic items in Tasmania. WMRR understand that information on what materials will be phased out and when, is to be addressed in the next stage of consultation when a Roadmap is released alongside draft legislation. Given that the consultation survey is predominantly a consumer targeted questionnaire, WMRR has opted to provide this written submission.

The plastics' problem is well addressed in the Discussion Paper. Plastic has afforded the community with convenient methods for food and beverage preservation and service in particular, and given the reliance on convenience, the phase out of single-use plastic creates opportunities for alternative products to participate in a circular economy. With this in mind, there must be a real shift under this policy, to move Tasmania from single-use to re-use and real emphasis on actual recoverability (not technical) of proposed "replacement" products when developing the draft legislation and Roadmap in order to avoid the ongoing "throw away" culture, or simply replacing one (1) waste with another. Although beyond the scope of this consultation, WMRR also comments that it would be optimal for the rollout of Australia's packaging design guidelines to coincide in so far as possible with the single-use plastic phase outs.

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WMRR notes that Tasmania has multiple levers in place to promote the successful phase out of single-use plastic items, namely that:

- The state is in the fortunate position of benefiting from the market impacts of having phase outs of single-use plastics in other Australian jurisdictions, with alternative products to single-use plastic items now widely available. This should ease the burden for industries most impacted by the phase-outs, such as quick service restaurants.
- There is already considerable public momentum for the reduction in availability of unnecessary plastic products to reduce environmental impact, particularly with regard to reducing litter and impacts on the marine environment, reducing the risk of potential harms from microplastics and forever chemicals, and promoting landfill diversion targets. WMRR acknowledges that the positive steps taken by the Tasmanian government so far in relation to prohibiting lightweight plastic bags, introducing the landfill levy, penalising the release of balloons and introducing the Container Refund Scheme have already contributed to reducing some of the problems of plastic litter and waste creation. These initiatives have signalled behaviour change from businesses and consumers to make product choices that avoid the creation of waste.
- There is a strong policy and regulatory basis to support the phase outs under the *Tasmanian Waste and Resource Recovery Strategy 2023-2026* vision and strategic framework for collaborative and focused effort for Tasmania to be a place where ‘nothing is wasted’.

WMRR broadly supports the phase out of all single-use plastics in all Australian jurisdictions, recognising that single use anything, is essentially waste and presents a key challenge to Australia designing out waste in accordance with the resource and waste management hierarchy. However, we note that NRE is seeking guidance on which single-use plastic products specifically should be phased out as a priority. A table showing the status of single-use plastic phase outs across Australia was provided in Appendix 1 of the Discussion Paper, highlighting that most jurisdictions are well progressed with phase outs, particularly for food service items, plastic shopping bags greater than 35 microns, loose fill packaging, plastic stemmed cotton buds and microbeads in healthcare products. In light of the progress in other Australian jurisdictions, it makes strong sense for Tasmania to align specific product bans already in place in the majority of other states and territories, given those product categories will likely have proven readily available, commercially viable alternatives available thus minimising inconveniences for Tasmanian businesses that currently rely on the supply of single use plastics.

In the first instance, WMRR recommends that NRE ensures that alternatives for the single-use plastic items proposed for priority phase out are currently recoverable with Tasmanian WARR facilities. WMRR would however stress that it is important that Tasmania focuses on re-use opportunities at every opportunity, and when it cannot, it is vital that the prevalence of PFAS in compostable packaging is understood in order to avoid creating another problem by proposing packaging that could adversely impact soils - noting that recycling is higher order than composting (recovery) under the waste managing hierarchy. Assuming that they are, it would make sense for Tasmania to prioritise the phase out of the following items which have been actioned already by the majority of other states:

- Drinking straws
- Beverage stirrers
- Single-use cutlery (this should be replaced with re-use cutlery)
- Single-use bowls (unlidded) (this should be replaced with re-use cutlery)
- Single-use plates (this should be replaced with re-use cutlery)
- Plastic shopping bags greater than 35 microns thickness
- Microbeads in healthcare items
- Plastic stemmed cotton buds
- Expanded polystyrene loose-fill packaging
- Expanded polystyrene fruit and vegetable trays
- Expanded polystyrene food service containers
- Expanded polystyrene multi-service gelato containers.

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-based plastics), and the emerging contaminants which could undermine the creation of a circular economy in Tasmania. Removing the jargon and banning all categories of single use items would be prudent as these terms 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, even with this label there is no guarantee that it is PFAS free as the PFAS is not measured, rather there is a flourine 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. This will help promote circular economy and resource and waste hierarchy principles by avoiding waste and helping to ensure the quality of recycled products so that Tasmanians can use less for longer.

Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely



Gayle Sloan

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