



Committee Secretary
Health and Environment Committee
Parliament House
George Street
BRISBANE QUEENSLAND 4000

Email: hec@parliament.qld.gov.au

12 January 2021

Dear Sir/Madam

Re: Waste Reduction and Recycling (Plastic Items) Amendment Bill 2020

The Waste Management and Resource Recovery Association of Australia (WMRR) welcomes the opportunity to provide further feedback on the Waste Reduction and Recycling (Plastic Items) Amendment Bill 2020. WMRR is the peak national body for the \$15.5 billion essential waste and resource recovery industry. We have more than 2,000 members representing over 500 individual entities nationally that operate across a broad range of business organisations, the three (3) tiers of government, universities, and NGOs.

The sector drives jobs – employing up to 50,000 people – and investment in the economy; in Queensland, the WARR sector currently employs more than 11,800 people and contributes \$1.5 billion to the state economy. WMRR's purpose is to lead the success of this essential industry while ensuring that the environment and community are protected through the safe and responsible management of waste.

As noted in WMRR's feedback on the Amendment Bill that was submitted to the National Resources, Agricultural Industry Development and Environment Committee (NRAIDEC) in July 2020, the Association supports the use of regulation in reducing single-use items, including plastics, and advocates that the focus should be on preventing the generation of these items in the first place to drive a shift in behavior, including (but not limited to) options further up the waste management hierarchy. Nationally, WMRR has been consistently advocating for greater emphasis on product (including packaging) design, focusing first and foremost on avoiding the creation of waste, in particular hard-to-recycle items made with problematic materials.

WMRR acknowledges the extensive consultation undertaken to-date, including the formation of a stakeholder advisory group, and appreciates NRAIDEC's consideration of WMRR's recommendations as noted in its report (number eight) to Parliament.

WMRR would like to make a few further recommendations that we hope the committee would consider before passing the Bill:

- The report notes several issues and recommendations that could be considered during the statutory two-year review, such as the penalty rate, highlighting the significance of this review in light of numerous proposals not being encompassed in this initial Bill, particularly the inclusion of EPS and oxo-biodegradable materials in the initial tranche of banned items. While WMRR supports the inclusion of these materials in the first tranche, particularly EPS given there are, in existence, alternatives to this product, we note that these items have not been included in the Bill, which the committee has proposed is passed. Thus, WMRR strongly suggests that a timeframe for second stage ban be written into the Bill; this could be aligned to the two-year review, i.e., that the second tranche will be rolled out as part of the review. This two-year timeframe provides businesses with adequate time to source

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alternatives and transition while adding much-needed pressure that would drive innovation and investment in product design. WMRR notes that the government is currently seeking feedback on the inclusion of single-use EPS takeaway food containers and cups in the proposed ban and proposes that a similar process for other materials identified during the first stage consultation of the Bill commence shortly thereafter for consideration and inclusion during the two-year review.

- WMRR continues to support the 1 July 2021 commencement date but again notes that flexibility must be given due to the continued COVID-19 pandemic and its medium- to long-term impacts on businesses. As such, it is imperative that a minimum six-month transition period is provided, including programs and initiatives such as community education, communication, and facilitation of the sourcing and use of alternatives.
- While schools have been exempted from the ban, WMRR acknowledges NRAIDEC's fourth recommendation that this exemption is reviewed as part of the two-year review. WMRR continues to strongly advocate against this exemption. Schools should not be allowed to distribute, sell, or use banned plastic items unless it is to persons who require these products due to a disability or medical requirement. There is an opportunity to drive generational change through this ban, with school aged children being champions of this initiative given many are currently participating in initiatives such as *nude food* (eliminating single-use packaging in lunch boxes), which should continue to be encouraged.
- WMRR does not support the exemption of single-use plastic items that are part of a shelf-ready product from the ban. As noted in WMRR's previous submission on the Single-use Plastic Items Consultation Regulatory Impact Statement, providing an exemption to manufacturers of shelf-ready packaged products could in effect provide an opportunity to avoid firstly, being responsible producers and secondly, thinking about redesign which is key in building a circular economy. However, WMRR acknowledges the concerns that have led to this exemption, as highlighted in NRAIDEC's report, and recommends that this exemption is reviewed during the two-year review and that manufacturers are informed of this timeframe in order to drive investment and innovation in product design now.

Please do not hesitate to contact the undersigned if you would like to discuss WMRR's submission further.

Yours sincerely

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