



30 July 2020

Committee Secretary
Natural Resources, Agricultural Industry
Development and Environment Committee
Parliament House
George Street, Brisbane Qld 4000

Email: NRAIDEC@parliament.qld.gov.au

Dear Committee Secretary,

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

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to contribute to the Natural Resources, Agricultural Industry Development and Environment Committee's consultation process on the *Waste Reduction and Recycling (Plastic Items) Amendment Bill 2020*.

The AFGC is the leading national organisation representing Australia's food, beverage and grocery manufacturing industry. The AFGC comprises more than 180 member companies, subsidiaries and associates, who together account for 80 per cent of the gross dollar value of the processed food, beverage and grocery products sector.

The AFGC supports the Queensland Government's initiative to address the impacts of single-use plastic products. Overall, the AFGC supports the Bill as it aligns closely with the aims and objectives of the National Packaging Targets and the National Waste Policy Action Plan and supports the findings and recommendations of the Queensland Single-Use Plastic Item Advisory Group. In particular the AFGC supports:

- the aim of the ban to reduce plastic pollution by reducing the number of single-use plastic items;
- the identified list of banned single-use plastic items under section 99GC of the Bill;
- the exemption from the ban of single use plastic items that are an integral part of a shelf-ready product, e.g. straws attached to fruit boxes and plastic spoons packaged with yoghurt [s99GC (2)(a)];
- flexibility regarding the start date of the Bill to take into account the impact of COVID-19 on relevant businesses (Clause 2);
- the Government's indication that the ban will not take effect any earlier than 1 July 2021 as adequate notice is required to enable existing stock of banned single-use plastic items to be depleted and removed from within the supply chain to reduce any economic loss incurred by local businesses;
- the provision of exempt businesses or undertakings to enable access to the banned items such as plastic drinking straws for vulnerable community members [s99GD(3)].

The AFGC notes that the Bill provides for the Minister to add further single-use plastic items to be banned by regulation following public consultation [s99GC(3)]. The AFGC recommends an amendment to this section in order to prevent unintended detrimental environmental or community outcomes. The AFGC recommends the Bill be amended to require that before including another product or class of banned single-use plastic items, an assessment against defined criteria must be undertaken. The omission of such an assessment may lead to perverse outcomes such as substitution by items that cause greater environmental damage or health and safety risks for the community.

In this regard, the Australian Packaging Covenant Organisation (APCO) has recently published a framework for single-use, problematic and unnecessary plastic packaging to "support industry and government to take a

collective and considered approach to the phase-out of problematic and unnecessary single-use plastic packaging.”¹

The AFGC recommends that the Minister use the APCO Single-Use Plastic [framework](#) process for determining potential additional banned single-use plastic items and proposes the following amendments to [s99GC(3)]:

(3)(b)(iv)(A) the availability of alternative products to the single-use plastic item, *that do not compromise the ability to meet health or safety regulations, or cause undesirable environmental outcomes; and*

[new addition] (3)(b)(iv)(v) *information regarding the reasons the product or class of product is proposed to be problematic and unnecessary including evidence the items:*

- *are not readily reusable, recyclable or compostable; or*
- *hinder or disrupt the recyclability or compostability of other products; or*
- *have a high likelihood of being littered or ending up in the natural environment; and*
- *can be avoided (or replaced by a reusable / recyclable / compostable alternative) while maintaining utility.*

Once again, thank you for considering the AFGC’s feedback in relation to the Bill. The AFGC is willing to provide further information on any of the points raised in this submission if necessary.

Yours sincerely,



Barry Cosier
Director, Sustainability

¹ Australian Packaging Covenant Organisation “Single-Use, Problematic and Unnecessary Plastic Packaging” 24 December 2019