

Circular Economy Team
GPO Box 3675
Darwin
NT 0802

6 April 2023

Circular.Economy@nt.gov.au

Submission: Phasing Out single use plastics in the Northern Territory

Thank you for the opportunity to provide our perspectives.

The Boomerang Alliance is the 'peak' community organisation representing 55 allied groups concerned with eliminating waste and plastic pollution. We engage with government, business, and the community to advocate for best practice policies and practices to eliminate and reduce the impacts of waste and plastic pollution on the environment.

Phasing out Identified Single Use Plastics.

We support the banning of these items as part of the NT Circular Economy Strategy. These bans are consistent with achieving National Waste Plan targets and consistent with policy measures in other jurisdictions. All of these items have preferred alternatives through avoidance, reuse, non-plastics and just changing habits and practices. Their removal will reduce litter and waste.

We recommend that the NT Circular Economy Strategy includes an ongoing program to address other single use plastics, through a continuous improvement approach.

To ensure the effectiveness of these measures we recommend that bans are legislated or regulated under existing legislation.

Items in detail

Heavyweight plastic bags

These remain a litter and waste problem. The preferred solution, and this is a view shared by most retailers, is to switch consumers to use their own BYO or reusable bags. According to the major retailers, most of their customers are already doing this.

We recommend that, in association with a proposed heavyweight bag ban, that the NT Government require all retailers to only sell or provide a reusable shopping bag that has been tested to a reusable standard.

The Boomerang Alliance (in collaboration with the National Retailers Association) has proposed the adoption of a national reusable shopping bag standard that is based upon an existing international framework from California and widely used in Europe. This standard requires that a reusable shopping bag be designed to complete a minimum 125 shopping cycles, be robust with a minimum thickness, made from recycled materials and able to be collected for recycling at the end of its useful life.

Only bags tested against this standard would be labelled and able to be sold as reusable.

The Boomerang Alliance position on reusable shopping bags exempts takeaway outlets and, where consumers may be purchasing a small amount of goods (e.g., one bag), in which case a paper bag can be supplied.

Plastic straws and utensils

These items can be replaced with non-plastic alternatives. Cafes can offset any cost increases through avoiding and reducing the supply of these items. Our Plastic Free Places project has demonstrated that simply removing these items from the counter and only supplying on request can reduce use by 70%.

Takeaway food outlets can virtually eliminate straws and utensils by only including these in an order where requested. Most takeaway food orders are for food consumed at home, where disposable utensils are not required.

Plates and bowls

These items can be replaced with reusable, non-plastic, or certified home compostable alternatives. These range from multi-use products to single use paper/cardboard, bagasse, to palm fronds or other plant-based materials.

For single use, some suppliers argue that non-plastic/home compostable products are not available when branding or advertisements are used on plates and bowls, due to the inks used. Suppliers have argued for an exemption in this instance.

The question here is whether an exemption is justified or should be allowed simply to allow advertising and promotional copy that adds nothing to the functionality of the plate or bowl. Any exemption would perpetuate more plastic use, at a time when many food service providers, markets and events have already made the switch away from plastics. Is allowing an advertisement on a disposable plates or bowl more important than supporting measures and practices that reduce the waste and litter impacts from these products?

We oppose such an exemption.

Were the NT Government to consider any exemption, a solution would be to allow AS certified commercially compostable packaging for a period, until non-plastic/home compostable alternatives are available to the market. Whilst, the NT is not currently well served by commercial compost facilities, this will change as governments seek to halve food and organic wastes going to landfill. Commercially compostable food ware has an advantage over standard plastic foodware as it is not derived from fossil fuels and could be collected through organic waste collections.

Switching to Reusable Alternatives

It's all about changing habits and government supporting measures to do this.

Reusable* plates and bowls should be the preferred and best alternative option. Many markets, festivals and events are already introducing and replacing single use with reusable alternatives that can be washed and reused at subsequent occasions.

*We have outlined later in the document our definition of what a reusable (or multiuse) product is.

With disposable packaging it is important to be mindful of the circumstances in which items are used. In most cases disposable items are used for takeaway food, at events and markets, at parties or as picnic ware. This means they are used once and then discarded as waste or litter.

However, as we have outlined above, many 'controlled environments' have the opportunity to make the switch to reusable food ware. The NT Government could support that change through introducing incentives for 'controlled environments' to introduce these new practices. The NT Government could also lead by example and make reusable food ware use standard practice in all government offices and facilities. Businesses should be encouraged to follow suit.

Expanded polystyrene food containers.

A ban on these items is long overdue. They represent a particular litter problem given their propensity to break up, and they are rarely recycled.

Expanded polystyrene loose packaging.

As above a ban is long overdue and there are plenty of preferred packaging alternatives.

Plastic microbeads

A voluntary industry ban is in place. This ban will address those who do not comply with the voluntary ban. We suggest a plastic microbead ban be extended to cleaning and polishing products that are just as likely to enter the sewage system and broader environment.

Release of helium balloons

We support this ban given the terrible consequences to wildlife from burst balloons. In addition, we recommend that the government introduce measures to manage the supply of these products. The Pro Balloon Industry Alliance can educate and inform their customers on the ban and the best ways to collect and return used balloons and associated strings.

Helium is a non-renewable resource and facing a supply shortage. The question needs to be asked whether such a vital gas for medical applications and research should be used for recreational balloons.

Additional Items

In addition, we recommend that the government:

- ban all degradable/oxo-degradable products.
- include plastic stemmed cotton buds
- Require all items claiming to be non-plastic to confirm such a claim, and also provide AS 5810 certification for these products*

***Note on Non-Plastic Takeaway Items**

A growing number of products manufactured using aqueous coating/water-based dispersion barrier technology are coming on the market. These include straws, utensils, coffee cups and containers. They are often marketed as being plastic-free, however they are not. Products with aqueous coatings are likely to contain styrene acrylates and other acrylic polymers.

It is important that we do not add to our plastic pollution problems by allowing products, with unproven or false claims, into the market.

General Comments

5.1 What is single use plastic?

We would suggest that the NT government adopt a definition of single use and multiple plastic packaging.

The European Union have described single use products as:

A single-use (plastic) product means a product that is made wholly or partly from plastic and that is not conceived, designed, or placed on the market to accomplish, within its lifespan, multiple trips, or rotations by being returned to a producer for refill or re-used for the same purpose for which it was conceived.

Based upon this the Boomerang Alliance describes a multiple use (reusable) products as:

A reusable product is one that has been conceived, designed, and placed in the market to achieve a minimum number of refill/return cycles, for the same primary purpose. Reusability must be conditioned on the basis that systems and services are in place that ensure that any refill/return cycles can be achieved.

5.2 What are degradable, biodegradable plastics?

As you rightly infer, these terms are confusing for consumers and businesses. Degradable or oxo-degradable products are not 'biodegradable'. As is the case in many other jurisdictions, we would suggest that the NT Government adds all degradable or oxo-degradable products to its current bans.

The term biodegradable has unfortunately been subject to many interpretations and allowed exemptions, so that it has become quite misleading as a term. We suggest that the NT Government refer to compostable products in this regard. Compostable products are subject to clear standards and can be identified and measured as such. We strongly suggest that only AS certified (AS 5810/AS 4736) be considered as allowable compostable products.

Currently, some plastic packaging items are only available as commercially compostable items. In the future, as products are improved, we recommend that only AS 5810 items be considered as allowable compostable products.

8. Circular Economy

The fundamental principles of a Circular Economy outlined are clear. However, your second principle, stating that products and materials be '*in use for as long as possible*' is subjective and open to misinterpretation. A well-functioning circular economy will maintain products and materials in the economy and, when required, convert these to secondary resources (at their highest resource value). Wastes will be eliminated. We suggest that the NT Government use the more universal principle,

Keeping products and materials circulating in the economy *based upon their highest resource value*.

9.1 Plastics in the Environment

We welcome the NT Governments proposed bans on problem plastics and recommend an ongoing program to eliminate other problem plastics, ideally in line with other jurisdictions. However, we also recognise that the NT cannot solve its plastic waste problems on its own. This will require a national approach that puts responsibility for plastic wastes on to the producers of these materials.

The most obvious means of doing this is for the Commonwealth Government to introduce a Product Stewardship Scheme for Packaging that includes mandated targets for reductions, recovery, and recycled content of packaging. This inevitably starts with manufacturers and producers designing products for their post-consumer discard as recoverable resources.

We recommend that the NT Government, as part of its efforts to reduce plastic waste in the NT, support and make representations to the Commonwealth to introduce such a scheme as soon as practical.

A PS Scheme for Packaging should include a target on the uptake of reusable products.

The current voluntary arrangements under the current PS scheme have failed to deliver desired outcomes or meet NWP targets.

The example of the NT CDS demonstrates the value of a product stewardship approach. Making the producer responsible for the collection and recovery of containers has dramatically reduced waste and litter and increased recycling. It has shifted the costs to the producer rather than governments and the waste industry. The CDS includes a refund to encourage return, this would not necessarily be a requirement for other PS schemes on packaging.

A national PS Scheme for Packaging (with mandated targets) would be an effective measure to contribute to the development of a functioning circular economy in the NT.

Toby Hutcheon

Boomerang Alliance

toby.hutcheon@boomerangalliance.org.au