

NATIONAL PACKAGING SOLUTION

BEST PRACTICE MANDATORY PRODUCT STEWARDSHIP SCHEME FOR PACKAGING

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INTRODUCTION

With Australian governments moving towards a regulated scheme for packaging, the Boomerang Alliance (BA) is seeking the development and implementation of a world leading mandatory Product Stewardship Scheme for Packaging that is informed by international best practice and in line with the principles and practices of a circular economy.

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1. BACKGROUND

Extended Producer Responsibility is a product stewardship strategy based upon the 'polluter pays' principle. In the case of packaging, its successful application means that those who bring packaging into a market must assume full responsibility for that packaging across its entire life cycle.

A **circular economy** is a system designed to ensure that products and materials used in an economy are managed in a way that eliminates any negative environmental consequences that result from the manufacture, use or disposal of that product or material. The three key principles of a circular economy are:

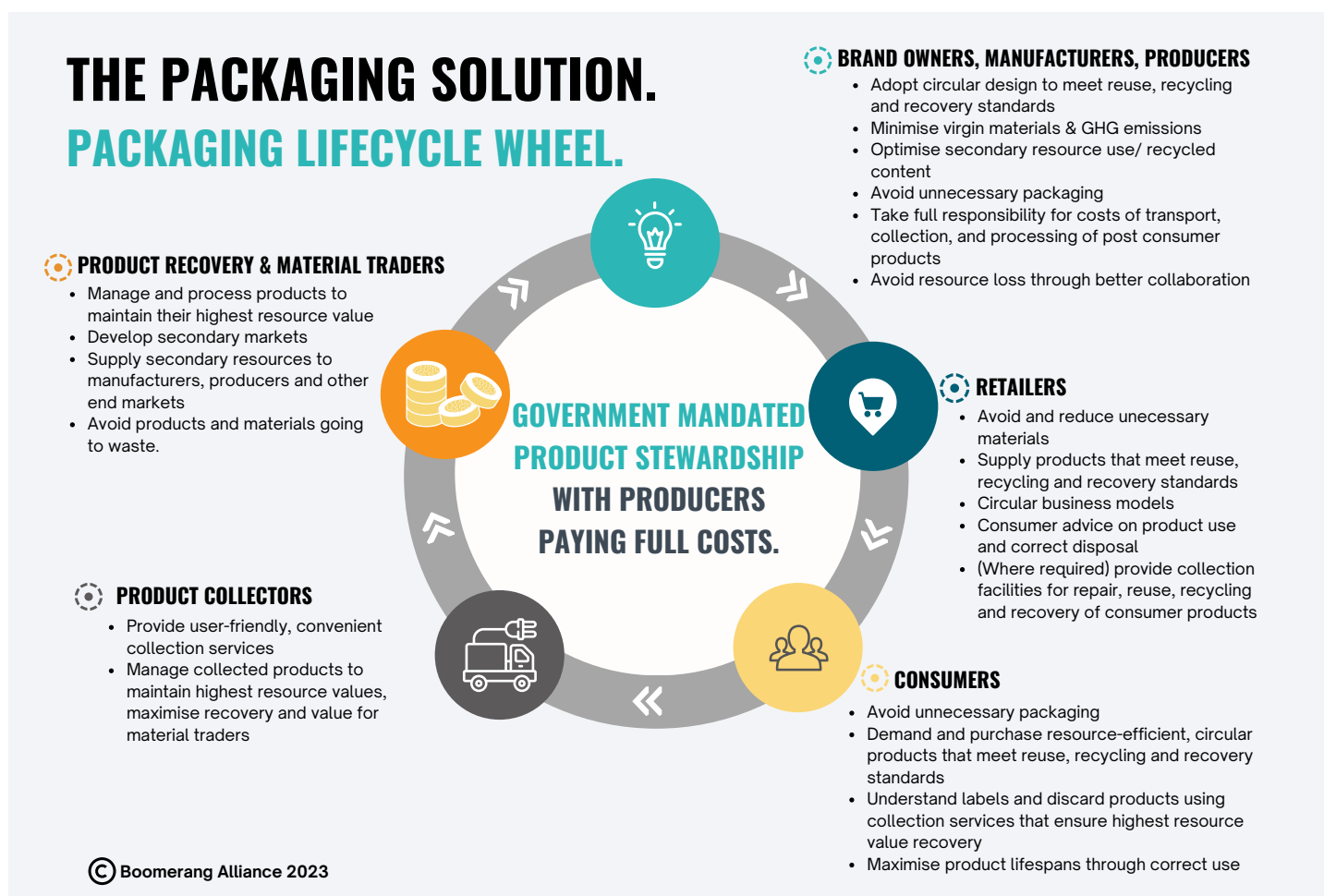
- The elimination of waste and pollution,
- The circulation of products and materials (through the economy) at their highest resource value and
- The regeneration of nature (through supporting natural ecological processes)

A circular economy is underpinned by, and dependent upon, the transition to a **zero-emission future and the adoption of sustainably sourced renewable energy and materials.**

A properly designed, mandatory and nationally harmonised EPR scheme is required to support the successful implementation of a national product stewardship model based upon best practise circular economy principles.

The Packaging Life Cycle Wheel

The Packaging Cycle Wheel shows actions required to achieve a best practice circular economy for packaging. This system is also dependent upon a continuous improvement approach to ensure that best practice is continually updated and improved upon.



2. INTERNATIONAL PRACTICE

BA has completed a comparative performance assessment of global packaging & waste reforms and Extended Producer Responsibility Schemes (EPR) to guide the development of a best practise packaging product stewardship model for Australia. The EU is globally leading in terms of the design and implementation of packaging legislation and EPR.

While Extended Producer Responsibility (EPR) is still in its infancy in Australia, first schemes were already introduced in Europe during the early 1990s. Germany's "Grüner Punkt" (Green Dot) for example was introduced over 3 decades ago and is considered the global forerunner of EPR. It was successfully introduced as an industry funded dual system and is covered under the European Waste & Packaging Directive. The Green Dot is used by more than 130,000 companies, encompassing 460 billion packages.



Image source: www.gruener-punkt.de

Snapshot of EU Packaging Policy & EPR Requirements:

- **Legislated and harmonised EPR:** The EU Packaging and Waste Directive established a framework for EPR, obliging all States to set EPR schemes by 2024 to meet EU wide targets. By 2024 producers will be required to cover the costs of collection, transport and treatment, clean up litter and awareness raising measures for food containers, packets and wrappers, cups for beverages, containers with a capacity up to 3 litres, lightweight plastic carrier bags and fishing gear.
- Implementation has varied widely across Europe, with some countries/ schemes exceeding ambitious targets while others are underperforming - largely due to nationally inconsistent legislation and compliance. The lack of harmonisation amongst states has created significant challenges for producers and consumers, leading to fragmentation and delays in a holistic shift to a circular economy. **As a result, the current Directive is set to be changed to mandatory EU wide regulation – bringing in a legally binding instrument holding all states to account.¹ A federally legislated and nationally harmonised EPR will be critical for Australia.**
- **Ambitious mandatory targets and compliance:** A detailed EU parliamentary impact assessment in 2022² has led to a preferred policy option containing mandatory requirements for the entire life cycle of all materials incl. mandatory consumption reduction targets, sector specific re-use and minimum recycled category content targets plus harmonised product rules. **An overview of proposed EU wide legislation is provided in Appendix A.**
- **Many EU countries have already successfully implemented steps well beyond the current EU Directive and beyond new proposed legislation.** A comprehensive review of best practice implementation, impact assessments and feasibility studies has informed the stewardship model proposed by BA for Australia, in consideration of applicability and viability in our national context.

¹ [Revision of the Packaging and Packaging Waste Directive EU Parliament 03 2023](#); [Proposal for the Regulation of the EU Parliament and the Council on Packaging / Waste 11 2022](#)

² [Detailed Impact Assessment Report 11 2022](#)

3. PROPOSED PRODUCT STEWARDSHIP MODEL

The Boomerang Alliance (BA) seeks a comprehensive mandatory product stewardship (PS) scheme, based upon circular economy principles and practices, that includes producers taking full responsibility for their products and materials placed onto the market, across the entire life cycle.

A nationally mandated PS model must be designed to create a level playing field, avoid 'free riding' and facilitate national collaboration for harmonised design to accelerate 'refill & reuse' and highest resource value recovery. As industry will want to limit the extent of multiple jurisdictional regulation and costs, a key aspect will be the adequacy of federal and state legislation and compliance to deliver an effective scheme.

"Governments are essential in setting up effective collection infrastructure, facilitating the establishment of related self-sustaining funding mechanisms, and providing an enabling regulatory and policy landscape." *New Plastic Economy, Ellen MacArthur Foundation.*

Guiding Principles

The Boomerang Alliance seeks a national scheme that includes in its scope all packaging and Circular Economy arrangements associated with that packaging, supported by the following principles:

1. Prioritisation of Avoidance and Reduction
2. Best Practice Eco-Design of Products
3. Mandated Standards
4. Extended Producer Responsibility (EPR) - Whole of Life Cycle & Supply Chain
5. Mandatory National Targets and Obligations
6. Development of Secondary Markets
7. A national scheme managed under Commonwealth legislation
8. A standardised monitoring, compliance, and enforcement regime
9. Commitment to continuous improvement
10. Consumer Education and Awareness

These principles are consistent with the 5 characteristics of effective product stewardship, developed by the Product Stewardship Centre of Excellence (see APPENDIX B).



The following section provides a summary of each principle:

1. Prioritisation of avoidance and reduction: Avoiding and eliminating the use of unnecessary resources and harmful substances is a priority. This should be the leading principle. Packaging that is unnecessary³ and cannot be readily domestically recovered in practice must be avoided. This includes all packaging in the B2B and B2C context, by weight and volume. As part of the scheme, targets on plastic packaging reductions should be included so that replacing one single-use product with another is discouraged (e.g. replacing plastic with paper or glass). The continued roll out of single use plastic bans across all states is required to avoid unnecessary and harmful packaging. Importantly, harmonisation of bans across states is a priority to remove complexity for producers, consumers and processors. This principle is supported by the need to establish a per capita single use packaging reduction target which will bring Australia in line with international best practice. It is also in line⁴ with the need to shift to carbon neutral packaging (see principle #5 – Targets).

“Where sustainable alternatives are easily available and affordable, single use plastic products cannot be placed on the market.”

EU Directive.⁵

2. Best Practice Eco-Design of Products (#1 Circular Economy Principle). The prioritisation of design refers to ‘**designing out waste**’, mandating the elimination of unnecessary resources and harmful substances during the design phase. As part of the scheme, all necessary packaging products must be manufactured for circularity and according to best practice resource efficiency and resource recovery requirements of their markets.

“Australia is very much focussed on the end of life at the moment. For effective product stewardship, we need to shift upstream to the design phase.” *Australian Centre of Product Stewardship Excellence.*



Extended Producer Responsibility (see principle #4) will reward producers who adopt sustainable design practices and penalise those who do not, incentivising products that are easy to recycle or reuse. The same approach applies to sustainable material sourcing, incentivising the decarbonisation of packaging and a shift away from non renewable and virgin materials. Reuse and refill solutions will be accelerated via the national and international harmonisation of design standards (principle #3).

3. Mandated Standards: All packaging will be designed for circularity and based upon their highest resource value via agreed, mandated national standards that cover reusable, compostable and recyclable packaging. Mandated standards will be based on international best practice as a minimum. In addition to design, mandated standards cover producer responsibilities across all lifecycle stages (principle #4), to ensure all packaging is **recovered in practice and at scale (not just technically recyclable)**, according to its category. **See Appendix C for more detail.**

The elimination of toxins is facilitated via clear standards, monitoring and regular reviews to eliminate newly discovered harmful substances.

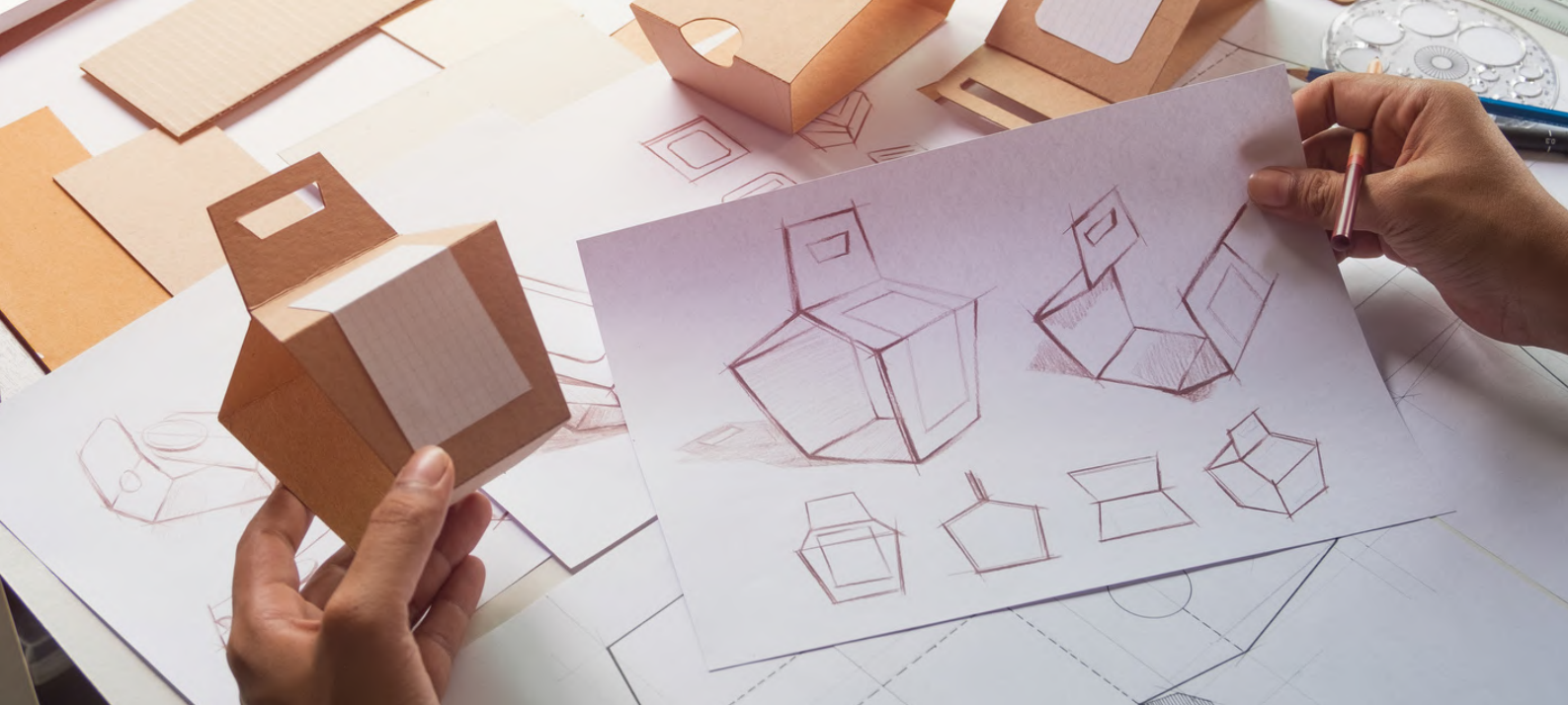
National standards for Materials Recovery Facilities include harmonised processing, data collection and reporting to create greater transparency and accountability.

Labelling: only packaging that has been verified as meeting the applicable standard (and will be recovered in practice and at scale) can be labelled as reusable, compostable or recyclable to avoid greenwashing. Noting that the ARL does not currently meet this requirement.

³ This includes excessive packaging and empty space.

⁴ Minderoo Foundation: Australia ranks highest after Singapore in single use plastic waste generation per capita (kg per person) (Plastic Waste Maker Index 2023 | www.minderoo.org/plastic-waste-makers-index)

⁵ EU Single Use Plastics Directive (environment.ec.europa.eu/topics/plastics/single-use-plastics_en)



4. Extended Producer Responsibility (EPR) - is a product stewardship strategy based upon the 'polluter pays' principle. In the case of packaging, its successful application means that those who bring packaging into a market must assume full responsibility for that packaging across its entire life cycle.

It will create a new definition of liability for Australian producers. Clear and nationally consistent legislation will ensure that producers are legally and financially responsible for all associated costs of their packaging. EPR covers producer responsibility across the entire life cycle – from sourcing materials, best practice design, manufacturing, consumer awareness raising measures (to avoid waste & litter) and the costs associated with the collection, transport, processing, recovery (and associated infrastructure), reporting and litter cleanups of post-consumer products. It also includes the costs of engaging third parties to deliver any required services.

“Businesses producing or selling packaging have a responsibility beyond the design and use of their packaging, which includes contributing towards it being collected and reused, recycled or composted in practice.” *New Plastic Economy, Ellen MacArthur Foundation.*

EPR includes all providers within the supply chain from brand owners, suppliers, importers to retailers. This will be enabled via clearly defined roles, expected standards and obligations for each group. To ensure the creation of an equal playing field and to avoid free-riders, measures will apply equally to domestic and imported products and extend to online retailers (ie e-commerce sector). All producers must participate in the EPR Scheme.

Polluter-pays principles will be developed with proportionality considerations, i.e. in line with the biggest environmental impacts of packaging materials across their full life cycles. A system of eco-modulated fees will be applied for single use products, rewarding refill/ reuse and highly recyclable packaging while eliminating hard to recycle, harmful packaging. This principle proposes the introduction of levies for virgin materials (e.g. virgin plastics tax) and incentives for locally sourced recycled materials. To successfully influence product design (principle #2), successful EPR requires a significant cost differential between desired and undesirable packaging.⁶

“Market transformation presents significant economic opportunities with net creation of jobs (compared to a BUA scenario) while reducing overall costs both for the private sector and governments”

‘How the world can end plastic pollution and create a circular economy’, UN Turning off the Tap Report 2023

⁶ European Plastics Pact, in partnership with Ellen MacArthur Foundation, July 2023 (europeanplasticspact.org)



5. Mandatory national targets and obligations are set to ensure desired resource recovery and secondary markets outcomes are achieved. A national roadmap sets out mandatory targets across reduction, minimum recycled content, recycling and reuse/refill. It includes the requirement to meet mandatory design standards, supply chain obligations, thresholds and timeframes.

Current 2025 NWP targets should be expanded to include additional **mandatory targets proposed in Appendix D**, bringing Australia in line with international best practice.

6. Development of secondary markets for discarded products.

Secondary markets for discarded products must be expanded to ensure the highest possible resource value outcomes for each material. Ambitious targets will be set to drive the increase in recycled content in new manufactured goods in line with global best practice or better. This means a market development and collection service focus on reuse, repair, composting as well as recycling and recovery.

This principle includes the introduction of landfill bans for all discarded materials and a requirement for all businesses⁷ to actively participate in the development of a circular economy. This includes the need for all consumers (individuals and businesses) to manage their packaging responsibly in line with highest possible resource recovery options.

Importantly, incineration (waste to energy) is not supported in this model as it hinders the transition to a circular economy. Waste to energy discourages avoidance and recycling and locks in increased generation of waste, which in turn undermines the ability to reach carbon neutrality.⁸

“All plastic packaging is reused, recycled or composted in practice. No plastic should end up in the environment. Landfill, incineration, and waste-to-energy are not part of the circular economy target state.”

New Plastics Economy, Ellen MacArthur Foundation

7. A national scheme managed under Commonwealth legislation:

National legislation is required to successfully deliver Australia’s product stewardship scheme, avoiding market fragmentation and an unnecessarily challenging environment for producers, consumers and industry stakeholders.

A nationally harmonised scheme will incentivise effective material flow and help establish uniform reporting requirements, creating traceability and transparency. These are prerequisites for a well functioning circular system.

⁷ This principle acknowledges that many Australian businesses and organisations are currently sending valuable recyclables to landfill. Going forward, all Australian businesses will be mandated to recycle. This will apply to all sectors, including offices, retail outlets, hospitality and building & construction.

⁸ Zero Waste Europe: zerowasteurope.eu/2021/05/wte-incineration-no-place-sustainability-agenda

National harmonisation will reduce the costs of implementing and managing EPRs by minimising administrative burdens. It will also support the successful implementation of current and future single use plastics bans and help accelerate Australia's shift to refill and reuse. Consideration will be given to special metro, regional and remote circumstances.

The new mandatory scheme must be governed by a national body with authority to implement, monitor and enforce targets. This body will be responsible for operational rules and facilitating industry participation in the scheme. Its Board must be accountable to the Commonwealth Government, not industry.

8. A standardised monitoring, compliance, and enforcement regime is established to meet government policy obligations and provide a 'level playing field' for all producers, public accountability, and performance outcomes. Harmonised definitions and reporting requirements will benchmark and monitor performance of EPR.

The national scheme will need the agreement of all State and Territory jurisdictions to pass any required legislation to ensure a consistent and harmonised approach.

Thorough data quality checks will facilitate a continuous improvement approach to ensure that all products, processes, and practices meet and retain world's best practice performance levels. Effective, transparent, standardised progress reporting will include annual updates against national milestones. Uniform conditions will be applied via refined methodology for calculation and verification of reduction, (recycled) content and collection targets. Significant and proportionate financial penalties will be applied for non-compliance and greenwashing to act as effective deterrents.

9. Commitment to continuous improvement through regular updated lifecycle analysis of product and supply chains, adoption of best practice and integration of latest and emerging technologies to improve upon current practices.

Continuous improvement takes account of hidden costs and associated impacts on human health and wellbeing, carbon footprint, job creation as well as the effects of plastic pollution on other industries and the environment. It should also be broadened to align with global commitments and the need of our immediate neighbouring countries to reduce plastic pollution (**see Appendix E – Commitment to International Targets**).



The scheme should publicly report on improvements made through easily accessible, transparent reporting.

10. Consumer (customer) education, awareness and behaviour change. Producers (and associated third parties) must make consumers aware of the best options to reduce unnecessary packaging, and the impacts and discard options of packaging they have purchased. This should include incentivising preferred packaging options. For example, items in single use packaging should be offered at a higher price, not at a reduced price as per common practice, than unpackaged comparable goods.

To ensure an efficient scheme, consumers, whether individuals, other businesses or organisations, need to know how to discard any packaging according to its category. Information and product labelling should be readily available to make consumers aware of collection options, based upon meeting highest resource value outcomes.

Producers must enable consumers to ‘close the loop’ by providing easy access to fit-for-purpose collection services for all packaging types. These collection services must be able to recover discarded packaging in practice.

“Products should not be allowed to be sold unless the packaging is 100% safe to use and not destined for landfill. The company who puts the packaging on the market must be fully responsible for what happens with it at the end.” Jayne D’Arcy, Northcote resident, Victoria.



Once fully implemented, Australia’s mandated product stewardship model will incorporate a world leading EPR framework designed to successfully meet ambitious waste and pollution reduction targets.

The scheme will help future-proof businesses by incentivising innovation, diversify our economy and support Australia’s commitment to net zero. The framework will create harmonisation across states and economies of scale to empower businesses and consumers in driving effective solutions.

APPENDIX A: INTERNATIONAL PRACTICE

Snapshot of EU Directive and Current EPR Requirements

Producers must take full responsibility for post-consumer packaging management. By December 2024 producers will for example be required to cover the costs of collection, transport and treatment, clean up litter and awareness raising measures for food containers, packets and wrappers, cups for beverages, containers with a capacity up to 3 litres, lightweight plastic carrier bags and fishing gear. The covering the costs of litter cleanups, awareness-raising and data gathering for balloons and wet wipes is required by December 2024.

Snapshot EU-wide Packaging Regulation: 2023 Policy Recommendations

The following 4 policy interventions are proposed to mandate packaging EPR across the EU.

Policy Intervention #1: Prevention and reuse

- Mandatory target of 5% reduction of packaging waste per capita in 2030 compared to 2018, supplemented with reduction targets for 2035 and 2040
- Update of Essential Requirements to minimize over-packaging
- Minimisation of empty space in packaging in selected sectors, incl e-commerce
- Phase out avoidable / unnecessary packaging
- Mandatory targets to increase sector specific reuse by 2030
- Revision of CEN standard for defining reusable packaging
- Definitions and mandatory requirements for reusable packaging formats set in EU legislation and standards for some formats
- Definition and mandatory standards for reuse systems
- Clarification of reuse activity versus a “preparing for reuse” activity

Policy Intervention #2: Recyclability and compostability

- All packaging shall be reusable or recyclable by 2030
- All reusable packaging must be recyclable as of 2030
- Qualitative definition of recyclable packaging
- Definition of recyclable packaging based on design for recycling (DFR) criteria complemented by the recyclability assessment procedure and a negative list of non-recyclable packaging characteristics
- Harmonisation of EPR Fee Modulation Criteria based on recyclability assessment
- Clarification of biodegradability and compostability and updates of respective Essential Requirements & Standard EN 13432²
- Mandatory compostability for certain out of the selected plastics packaging types and requirement of material recyclability for the remaining biodegradable plastic packaging

Policy Intervention #3: Recycled content

- High ambition targets for recycled content in plastic packaging based on contact-sensitivity for 2030 and 2040
- Definition of Recycled Content and measurement method

Policy Intervention #4: Enabling measures

- Mandatory Deposit Return Schemes (DRS) for plastic bottles and beverage cans (waiver if Member States can prove 90% collections targets achieved by other means) and minimum requirements for all DRS
- Harmonised labelling of products and waste receptacles to facilitate consumer sorting
- Harmonised, mandatory labelling for reusable packaging
- Labelling criteria for Recycled Content
- Update of current material-based labelling: Removal of alphanumeric codes for waste sorters

- Restrictions on use of confusing labels
- Update of definitions concerning hazardous substance
- Expanding the information on hazardous substances
- Notification of substances of concern in packaging
- Restrictions of hazardous substances under REACH
- Minimum GPP criteria for packaging of priority products and services
- Harmonised EPR reporting system
- Extended reporting obligation on PCB

The proposed EU wide regulatory instrument includes the following:

- **Stringent quantitative and time-bound targets** aligning with monitoring and evaluation schemes, supported by enforcement measures that increase accountability and compliance.
- **Incentives / disincentives to drive better design**
- **Transparency** across costs, collection & distribution of EPR fees
- **Clearly defined and allocated roles & responsibilities**
- **Stringent requirements for harmful substances:** presence and concentration
- **Recyclability Standards:** materials must be designed for recycling in practise via currently available domestic recycling streams; recycling must result in secondary raw materials being of sufficient quality to substitute the primary raw material; and recyclable at scale. EU wide recycling standards include recycling performance grades, percentage of recycled content, and methodology to assess recycling at scale.
- **Packaging minimisation:** packaging must be designed to minimise weight and volume. Unnecessary packaging and packaging only aimed to increase the perceived volume of the product (e.g. double walls or false bottoms) would be banned. Space filled by materials (such as paper cuttings, bubble wrap or polystyrene) would be considered empty space.
- **Eight reusability conditions:** for packaging to be considered reusable. For instance it can be emptied, unloaded, refilled or reloaded while ensuring compliance with the applicable safety and hygiene requirements. Operators placing reusable packaging on the market would have to ensure that a system for re-use of such packaging is in place. Operators using reusable packaging would have to participate in one or more re-use systems and would have to recondition such packaging prior to offering it again for use by end users, for instance by cleaning and washing in accordance with hygiene standards. They would also have to comply with obligations regarding consumer¹ information and the characteristics of refill stations. A wide range of re-use and refill targets for different sectors and packaging formats would need to be met by 2030 and 2040. 2
- **Labelling, marking and information requirements:** packaging (incl e-commerce) would have to be marked with a label containing information on its material composition. From 4 years, packaging would have to bear a label/digital carrier on reusability and facilitate the tracking of the packaging. All waste receptacles for collection of packaging waste would also have to be labelled by 1 January 2028, to enable the separate collection of each material-specific fraction of packaging waste. The Commission would adopt harmonised label and specifications.
- **Consumer Awareness:** producers would also have to provide consumers with information on the prevention and management of packaging waste, for instance on the impact on the environment and on human health of inappropriate discarding of packaging waste
- **Conformity assessment:** before placing packaging on the market, manufacturers would have to complete conformity assessments, draw up the technical documentation and a conformity declaration

- **Additional packaging categories to be banned** (e.g. single use plastic packaging for less than 1.5 kg of fresh fruit and vegetables; single use packaging in the hotel and catering sector e.g. individual portions for condiments and); some packaging items would have to be compostable e.g. tea or coffee bags /single-serve units, fruit & veg labels and lightweight plastic carrier bags)
- **Plastic carrier bags:** member States would have to take measures to achieve a sustained reduction in the consumption of lightweight plastic carrier bags on their territory, so that annual consumption would not exceed 40 lightweight plastic carrier bags per person, or the equivalent target in weight, by 31 December 2025.
- **Member states would have to:**
 - Reduce the packaging waste generated per capita.
 - Set up a mandatory register of packaging producers and monitor compliance
 - Set up systems for the return and separate collection of all packaging waste to facilitate re-use and high-quality recycling.
- **Green public procurement:** Contracting authorities would have to apply green public procurement criteria when awarding public contracts for packaging or packaged products or for services using packaging or packaged products. The Commission to establish minimum mandatory green public procurement criteria through delegated acts
- The Commission would be empowered to adopt additional targets for other products through delegated acts.

APPENDIX B: 5 CHARACTERISTICS OF EFFECTIVE PRODUCT STEWARDSHIP

- High levels of industry or business investment and participation were essential for realising these benefits - regulation was viewed as necessary to achieve high levels of participation and investment in most sectors.
- Clearly defined objectives - Measurable environmental, social, and economic performance indicators demonstrate benefits and allow for continual assessment of the effectiveness.
- Good governance - This includes well-defined roles and responsibilities and ensures transparency through public reporting.
- Use of financial incentives - to drive behaviour change of businesses, consumers, repairers, collectors, sorters, and recyclers.
- Effective marketing - leading to high awareness and increased user participation.

Source: [Product Stewardship Centre of Excellence](#)

APPENDIX C: MANDATORY STANDARDS FOR REUSE, COMPOSTABLES AND RECYCLABLES (PRINCIPLE #3)

A Reusable Standard (and consistent with ISO 18601:2013 Packaging and Environment-Reuse) Framework would include the following requirements:

- Minimise the use of virgin material and maximise recycled content
- Not contain hazardous materials or materials difficult to recycle
- Must be designed to accomplish a minimum number of reuse cycles
- Must have systems in place to allow either consumer reuse or return options
- Should prove it can complete a minimum number of cycles for a particular use
- Time to complete reuse cycle must be proportional with time user takes to consume product (e.g., takes account of time to post/return etc)
- Recoverable/recyclable at end of life
- Be certified against the standard via objective testing

All certified products should be labelled with a designated symbol and instructions for reuse.

EXAMPLE: A Reusable Shopping Bag Standard would include:

- A bag designed to carry shopping items (up to 10 kgs) multiple times for same primary purpose
- Multiple times means a minimum 125 cycles
- Be fit for purpose
- Contain minimum recycled content
- All materials that bag is made of able to be collected and recovered at end of the bag's useful life (retail space collection)
- The bag must be certified and tested against this standard

All certified shopping bags should be labelled with a designated symbol and instructions for reuse.

Compostable Standard

The Australian compostable standards (AS 4736/AS5810) should be adopted in regulation now by all state and territory jurisdictions. If jurisdictions allow compostable products in the interim, only certified AS products should be allowed in the marketplace. A process of continuous improvement should be in place to ensure that AS 4736 products can be phased out, with AS 5810 becoming the standard.

2

The Australian compost standards AS 4737/AS 5810 require the same performance standards:

- 90% biodegradation within 180 days
- 90% of (plastic) materials should disintegrate into less than 2 mm within 12 weeks
- No toxic effect on plants or worms
- Hazardous substances should not be present above maximum allowable

Any non-plastic packaging claiming to be compostable should also be required to meet the AS compost standard. There are products in the market that claim to be non-plastic which are questionable. A requirement to meet the standard will ensure there is no greenwashing by suppliers.

Manufacturers must take responsibility for the provision of collection services or negotiate with other parties on provision of such services.

As referenced above, and to be consistent with other standards, manufacturer responsibility should be included in this standard. All certified products should be labelled with a designated symbol and instructions for recovery.

Recyclable Standard

Products claiming to be recyclable and using the ARL must all be designed and proven to be recycled in practice. They would need to be certified to a Recyclable Standard not simply to meet the requirements of the ARL. This would include obligations to design for recycling; provide fit for purpose products; and take responsibility for post-consumer recovery. It will mean accepting recycled materials back into product manufacturing streams.

Products marked as recyclable must be designed for easy and cost-effective product recycling, with systems in place to give consumers an effective and realistic opportunity to deposit for recycling.

Once collected, items must be recycled (based upon agreed recovery targets) in practice and at scale in all regions.

In Australia a framework for product stewardship (or shared responsibility for recovery) is in place. The reality is that consumers, ratepayers, and waste processors largely fund product recovery. Under a Recyclable Standard, manufacturers will need to fund or negotiate with other parties to ensure that recovery does take place.

Setting targets for recyclable content in new products will drive much of this recovery effort.

A Recyclable Standard should include the following requirements:

- Minimise the use of virgin material and maximise recycled content
- Not contain hazardous materials or materials difficult to recycle
- Demonstrated eco-design, in consultation with product recyclers
- A product or package is fit for purpose
- Manufacturer takes responsibility for recycling through either direct funding of collection and recycling or negotiation with other parties on this provision
- Acceptance of recycled materials back into manufacturing stream
- All products certified to the standard with the ARL certification process broadened to incorporate these additional requirements as well as consumer instruction about product collection.

The ARL certification process could be broadened to incorporate these additional requirements as well as including specific instructions on collection options.

APPENDIX D: MANDATORY NATIONAL TARGETS & OBLIGATIONS (PRINCIPLE #5)

Current 2025 NWP targets should be expanded to include the following mandatory targets, bringing Australia in line with international best practices.

- **Substantial national reduction targets:** first and foremost, sustained reduction in single use packaging & waste overall and per capita (including the reversal of increasing single use packaging consumption trends). BA proposes a 20% waste per capita reduction target to align with international best practices.
- **Current NWP 2025 targets:** We note that the packaging industry agreed to meet these targets in 2019 and should be in a position to now meet current 2025 targets. APCO has confirmed they are at the implementation stage for meeting these targets. If this is not the case, an exemption could be allowed to give producers one extra year to comply (by 2026) and ensuring that packaging is recovered in practice and according to the conditions of identified packaging standards.⁹
- **Roadmap beyond NWP 2025 targets:** a roadmap needs to be developed in line with best practise standards and targets, outlining the phasing in of targets beyond 2025. Harmonised annual audits and transparent reporting is mandatory to ensure the tracking against targets is closely monitored.
- **A national reuse target of 30% by 2030** in line with Boomerang Alliance (BA)'s 2023 'Choose To Reuse' Report, outlining a priority based approach for specific categories. This includes the need for Governments to set a clear national direction on refill and reuse and provide investment for the establishment of reuse collection services.
- **Zero emissions packaging:** an additional net zero target is introduced to ensure Australia transitions to carbon neutral packaging.
- **Category specific targets:**
 - To accelerate the meeting of targets, BA seeks the identification of higher reuse, recovery and recycled content targets for specific items (e.g. takeaway packaging, beverage containers, produce bags, water bottles, detergents & personal care items should have more ambitious targets).
 - **Recyclable packaging must meet targets.** Specific product targets should include a timeline for products that are readily recyclable, products that require redesign to become readily recyclable and those where it is not economic to recycle, where a phase-out time frame is required. The recycling sector must be involved in determining these categories and the actions required to meet recovery targets; determining recyclability is not a matter that should be left to the producer.
 - **A clear strategic direction on recycled content** is necessary to ensure recycled content targets are met. That means spelling out what the strategy is to achieve this. This includes requirements that manufacturers / suppliers meet both design criteria and be responsible for the full life cycle costs. Targets for recycled content (as per NWP) with specified targets for non-plastics, plastics, and more ambitious targets for items where recycled content is more easily achieved. Reporting on recycled content will be mandatory.

⁹ Note: NWP compost and recycle targets for 2025, were established in 2019. BA recommends these remain as the benchmark.

APPENDIX E: COMMITMENT TO INTERNATIONAL TARGETS (PRINCIPLE #9 CONTINUOUS IMPROVEMENT)

Ongoing minimum commitments include a national commitment to the Global Plastics Treaty and a commitment to best practise international standards and targets. As International brands will continue to be mandated by the EU to adhere to increasingly stringent requirements, these should be adopted (and regularly updated as required) as minimum requirements for Australia.

Australia's net zero packaging target will support the Paris agreement.

International obligations extend to waste exports. In line with EPR principles, Australia's packaging cannot result in increased negative impacts overseas, incl. increased overseas landfill, emissions or marine litter. Monitoring, traceability and inclusion in targets are key.

Australia should also support and provide funding for plastics avoidance, reuse and recovery in our immediate neighbouring countries in the SE Asian and Pacific region.

Commitment to 'NEW PLASTICS ECONOMY VISION':

THE NEW PLASTICS ECONOMY VISION

Signatories of the New Plastics Economy Global Commitment endorse the common vision of a circular economy for plastic, where plastic never becomes waste. They recognise it offers a root cause solution to plastic pollution with profound economic, environmental and societal benefits. Signatories recognise this vision is the target state we seek over time, acknowledge that it will require significant effort and investment; and recognise the importance of taking a full life-cycle and systems perspective, aiming for better economic and environmental outcomes overall. Above all, they recognise the time to act is now. For plastic packaging specifically, signatories recognise a circular economy is defined by six characteristics:



Source: Ellen MacArthur Foundation