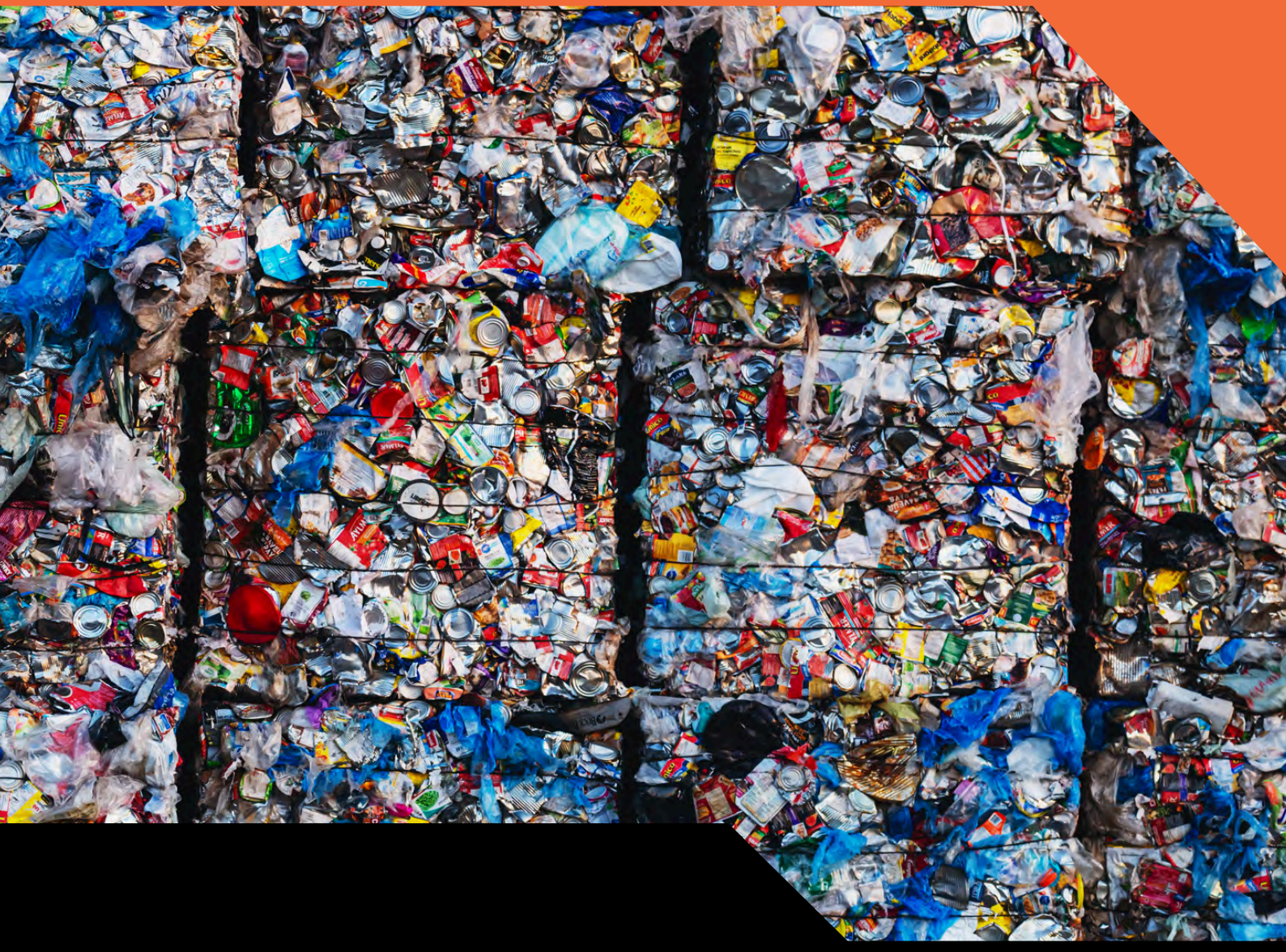
NATIONAL PACKAGING REFORM

EXTENDED PRODUCER RESPONSIBILITY

BEST PRACTICE PRODUCT STEWARDSHIP SCHEME FOR PACKAGING



BOOMERANG ALLIANCE

Founded 20 years ago, the Boomerang Alliance is Australia's leading circular economy NGO, campaigning to stop waste and plastic pollution at the source on behalf of our national network of allies, supporters and the Australian community.

Australians are the second largest consumers of single use plastic packaging in the world*and we only recycle 18% of the plastic we use. It's time for change.
**Plastic Waste Maker Index, Minderoo Foundation*

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ACKNOWLEDGEMENT

MAY 2026 V3.

Since the publication of the first edition of Boomerang Alliance's proposed product stewardship model in October 2023, regular briefings have been provided to all Commonwealth, State and Territory Government Departments and Environment Ministers. Selected Local Government Associations have also been briefed.

Further, views have been sought from ACOR, the National Retailers Association, Australian Food and Grocery Council, Australian Packaging Covenant Organisation and the Product Stewardship Centre of Excellence.

Sector experts including Helen Millicer, CEO One Planet Consulting, and representatives of BA's 56 environment sector allies have also provided feedback. We acknowledge and thank those who have provided their responses. The changes subsequently made provide an updated and refined version of our proposed product stewardship model.

CONTRIBUTORS: Birte Moliere, Jeff Angel & Toby Hutcheon

> **Australia and Europe are the two jurisdictions in the world that have the greatest potential to go circular on plastics - if the right policy settings were put in place.**
> *Global Expert John Richardson ICIS Circular Economy Plastics Conference 2023.*

BACKGROUND

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.

Packaging product stewardship is an environmental management strategy where packaging manufacturers and retailers take responsibility for the full lifecycle of their packaging – minimising health, safety, environmental, and social impacts, shifting the costs for packaging waste management from taxpayers and ratepayers to packaging producers and the end users (user pays principle).

Mandatory packaging product stewardship refers to a scheme that is required to meet mandatory waste targets and requires **all** manufacturers and suppliers of packaging to be members of the scheme to create a level playing field and avoid free riders.

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)**

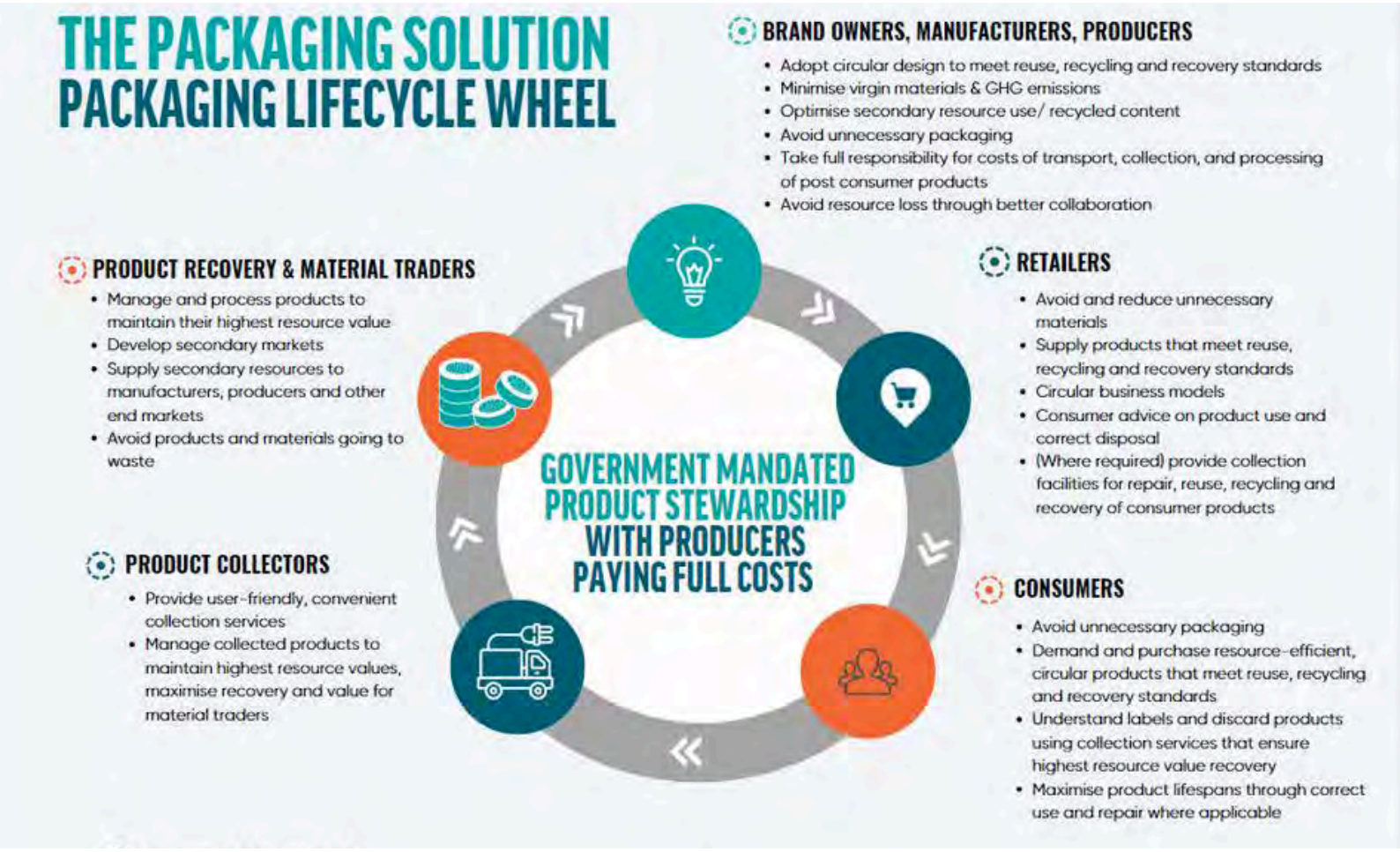
A circular economy is underpinned by, and dependent upon, the transition to a zero-emission future and the adoption of sustainably sourced renewable energy and materials.

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

THE PACKAGING LIFE CYCLE

The packaging wheel places producer responsibility at the centre, however stresses the need for a long term, bold and collaborative strategy addressing improvements required across all levels of the supply chain – from collectors, Material Recovery Facilities (MRFs), residents to local governments.

The term **consumers** refers to everyone who procures packaging, including individuals, businesses, organisations and governments.



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 has been covered under the European Waste & Packaging Directive. The Green Dot is used by more than 130,000 companies, encompassing 460 billion packages.

SNAPSHOT EU PACKAGING POLICY & EPR REQUIREMENTS

The Packaging and Packaging Waste Regulation (PPWR) obliges producers to take responsibility for the full life cycle of their packaging.
Producers are required to pay EPR fees to offset collection/recycling costs by 2028.
A declaration of conformity for packaging must be issued before placing it on the market.

Individual member states will determine policies in their own jurisdictions, consistent with EU-wide regulations. Those regulations include:

- Progressive packaging reduction targets to 2040
- All packaging placed into the EU market must be recyclable or reusable by 2030. Secondary legislation will define 'recyclability' under three grades-A, B and C and introduce eco-modulating fees accordingly.
- Plastic packaging must contain a certain percentage of recycled content depending upon type by 2030.
- All States must introduce Container Deposit Schemes for cans and bottles and must achieve a 90% return rate by 2029.

Reuse requirements for specific products and uses must be in place by 2030.
**see Appendix A for more details*

IN ADDITION

- **2030, including plastic packaging on fruit and vegetables; condiments and sauces; small cosmetics; and toiletries used in the accommodation sector.**
- **All lightweight plastic bags will be banned unless required for hygiene.**
- **New obligations for take-away businesses allow customers to bring their own containers for food or drink.**
- **By 2030, take-away activities need to offer at least 10% of products in reusable packaging.**

PROPOSED MODEL: EXTENDED PRODUCER RESPONSIBILITY

The Boomerang Alliance seeks a comprehensive mandatory EPR scheme (or as often referred to – a mandatory product stewardship scheme) based upon, based upon circular economy principles and practices, that centres on Extended Producer Responsibility where producers taking full responsibility for the packaging placed onto the market, across the entire life cycle.

Mandatory EPR refers to a scheme that requires **all** manufacturers and suppliers of packaging to be members of the scheme to create a level playing field and avoid free riders.

A nationally mandated scheme must be designed to meet mandatory waste targets and requires 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 and speed 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.**

10 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:

- **Prioritisation of Avoidance and Reduction**
- **Best Practice environmentally sustainable design**
- **Mandated Standards**
- **Extended Producer Responsibility (EPR) - Whole of Life Cycle & Supply Chain *(including all producers of packaging supplying the market)***
- **Mandatory National Targets and Obligations**
- **Economic Stability And Material Sovereignty.**
- **A national scheme**
- **A standardised monitoring, compliance, and enforcement regime**
- **Commitment to continuous improvement**
- **Consumer Education and Awareness**

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

OVERVIEW OF 10 PRINCIPLES

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 unnecessary[1] 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 packaging item 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 line with the need to shift to carbon neutral packaging (see principle #5 – Targets).

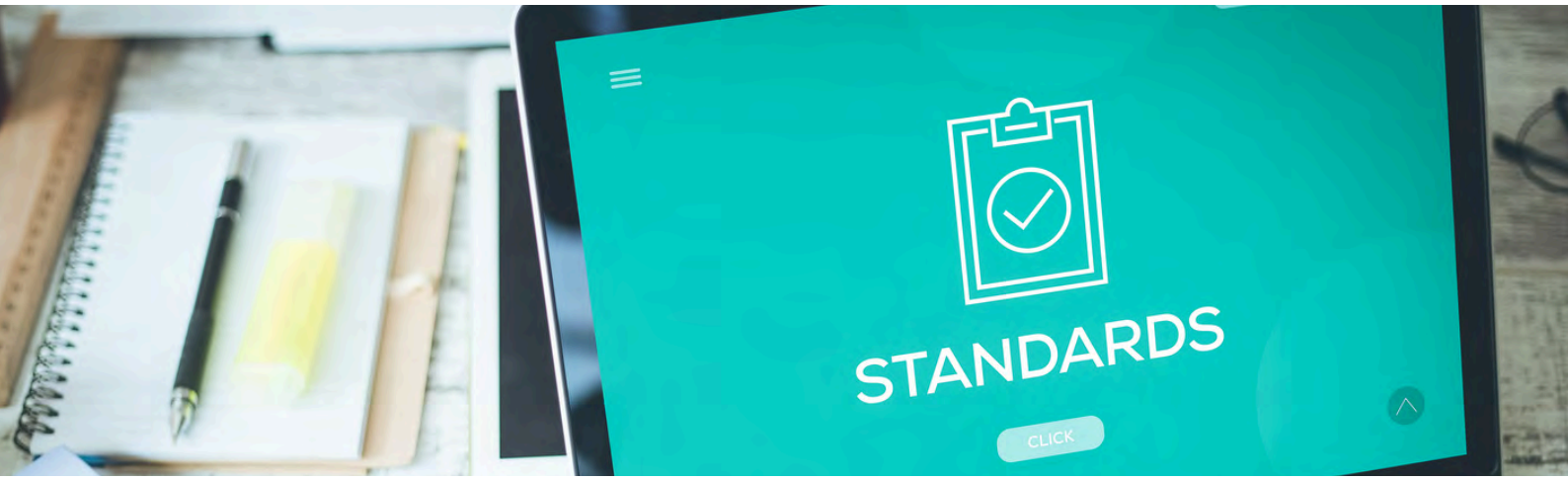
> **Where sustainable alternatives are easily available and affordable, single use plastic packaging cannot be placed on the market.**
> *EU Directive.*[2]

2

Best Practice Sustainable Design of Packaging (#1 Circular Economy Principle):
The prioritisation of design refers to **'designing out waste',** mandating better design to ensure long life, reuse & recyclability and to eliminate unnecessary resources & harmful substances during the design phase. As part of the scheme, all necessary packaging must be manufactured for circularity and according to best practice resource efficiency and resource recovery requirements of their markets. Extended Producer Responsibility (see principle #4) will reward producers who adopt sustainable design practices and penalise those who do not, incentivising packaging 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). This principle relates directly to the Australian Government's Report on eco-design which identifies 4 levers including Policy/Strategy/Targets; Economics and Finance, Regulations and Legislation, Training and Education – outlining 10 recommended actions to move beyond the Tipping Point in the innovation curve (dcceew.gov.au || helenmillicer.com/resources).

> **Australia is very much focused 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*

1 This includes exessive packaging and empty space
2 EU Plastics Directive | environment.ec.europa.eu/topics/plastics/single-use-plastics_en



3

Mandated Standards: All packaging will be designed for circularity and based upon its 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 regulation: clear standards, monitoring and regular reviews are required to eliminate harmful substances. A process of continual improvement must be implemented with funding allocated to research and monitoring. Packaging regulation must introduce mandates to eliminate Substances of Concern (SoC) across all packaging materials, forcing a shift to safer alternatives. Australia's regulation should work alongside advanced existing EU frameworks to ensure that SoCs such as phthalates and bisphenols are phased out. Historically, recycled plastics often contained legacy toxins from their first 'life' By forcing manufacturers to eliminate these chemicals at the design stage, regulation will result in safer recycled plastics.

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.

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 packaging. 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*

4 CONT'D

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 packaging 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 or fee modulation will need to be established and applied to all packaging, rewarding refill/ reuse and highly recyclable packaging while eliminating hard to recycle, harmful packaging. Fees should be adjusted annually and based upon meeting desired outcomes. 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 packaging design (principle #2), successful EPR requires a significant cost differential between desired and undesirable packaging.[3]

Under the proposed scheme all brand owners supplying the Australian market will be required to join the scheme and contribute to its outcomes according to the rules and regulations established. In the case of imported packaging, where a brand owner is not identified, importers will be required to join the scheme, if supplying the market.

There is existing infrastructure for households and businesses that should continue to service their sectors. Producer contribution costs would offset many of these costs currently directly paid by ratepayers and businesses.

> **Market transformation presents significant economic opportunities with net creation of jobs (compared to a BAU 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*

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. This includes a strong, **legally binding 20% plastic reduction and 30 % reuse target by 2030.**

3 European Plastics Pact in Partnership with the Ellen MacArthur Foundation, July 2023 | europeanplasticspact.org

6

Economic Stability And Material Sovereignty. Packaging reform is vital to secure material sovereignty and shield the Australian economy from global supply chain shocks. By reducing our overreliance on imported packaging materials, in particular fossil fuel based plastic resin, we can pivot toward domestically recycled materials and keep resources within our borders. Material circulation is not a nice to have. It supports economic stability, stimulates green jobs and helps build a self-reliant, resilient future.

Development of secondary markets Secondary markets for discarded packaging must be expanded to ensure the highest possible resource value outcomes for each material. drive the increase in domestic recycled content. 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 explicit landfill bans for all discarded materials and a requirement for all businesses 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.[4]

Economic levers are required to enable Australia to achieve its recovery and recycled content targets via better sorting, collection and processing. Leading nations prohibit landfilling of recyclables via bans and / or significant landfill fees. In addition, green procurement must be mandated to stimulate market pull. **This should include virgin plastic (import) taxes, recycled content mandates and Australian made mandates.**

This principle stresses the importance of building up domestic markets and actively limiting the import of (recycled) packaging materials from overseas, ensuring low cost imports do not limit Australia's potential for circularity. A traceability regime is an essential component of EPR, and a vital measurement of scheme effectiveness. Any traceability regime must provide accurate and useful data to measure performance, and must be a mandatory requirement.

Importantly, **incineration is not supported in this model** as it hinders the transition to a circular economy. Incineration discourages avoidance and recycling and locks in increased generation of waste, which in turn undermines the ability to reach carbon neutrality. Similarly, chemical recycling is questionable due to its high GHG emissions profile and diversion to fuel use.

The EU is moving away from incineration in policies and funding, recognising **burned resources are lost forever.** Plastics Europe has called for incineration to be listed below landfill on the waste hierarchy, recognising it increases emissions and undermines recycling.[5] Plastics Europe (PE) is the pan-European association of plastics manufacturers with offices across Europe. With close to 100 members producing over 90% of all polymers across Europe, *"PE's mission is to help accelerate a solutions-driven approach working towards the circularity and climate goals of a sustainable plastics industry"*.

> **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*

4 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.

5 Zero Waste Europe: zerowasteeurope.eu | Plastics Europe: Statement from ETs and Incineration Position Paper - Plastics Europe 2021.

7

A national scheme: Australia-wide legislation via an inter-governmental agreement is required to successfully deliver the 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.

It will reduce the costs of implementing and managing EPRs by minimising administrative burdens; 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 acknowledging current differences in collection and infrastructure.

The new mandatory scheme must have authority to implement, monitor and enforce targets. An effective oversight body will be responsible for operational rules and facilitating packaging, recycler and community participation. Its Board must be accountable to the Commonwealth and State Governments and the community, not industry.

In the absence of timely national decision making, BA supports unilateral state actions similar to the roll out of the Container Deposit Schemes, to avoid further delays.

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 packaging 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. Transparency must be ensured across costs, collection & distribution of EPR fees.

New mandatory climate reporting will need to include the extensive footprint of packaging across its entire lifecycle, which currently tends to be neglected in climate reporting.

9

Commitment to continuous improvement through regular updated lifecycle analysis of packaging 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.

Australia is a signatory to the New Plastics Economy Global Commitment.
Launched in October 2018 by the Ellen MacArthur Foundation and the UN Environment Programme, the New Plastics Economy Global Commitment unites businesses, governments, and other organisations from around the world behind a common vision of a circular economy for plastic, in which it never becomes waste or pollution.
The Global Commitment brings together over 500 signatories that are determined to start building a circular economy for plastics. Signatory governments and businesses representing 20% of all plastic packaging produced globally have committed to change how we produce, use, and reuse plastic in line with the principles of a circular economy for plastics.

10

Consumer 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, governments or organisations, need to know how to discard any packaging according to its category. Information and packaging 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. Governments and consumers play a key role in achieving reduction and reuse targets via targeted behaviour change strategies.

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 EU-WIDE PACKAGING REGULATION V 2024

Please note, below presents a 2024/25 snapshot. Information is regularly updated on BA's website.

	2030	2040
Packaging Reduction Target	5%	15%
Packaging Recyclability: all packaging must be recyclable and categorised under a recyclable level A,B or C. Secondary legislation will determine those conditions	✓	-
Minimum Recycled Content: Contact-sensitive plastic (PET as major component)	30%	50%
Minimum Recycled Content: Contact-sensitive Plastic (PET not as major component)	10%	25%
Minimum Recycled Content: All other plastic packaging	35%	65%
Reuse Target: Transport packaging including e-commerce (some exemptions for cardboard and food contact packaging)	40%	70%
eGrouped packaging used to group products in a uniteee	10%	25%
Alcohol and non-alcoholic beverages (excluding highly perishable, milk and aromatised wine	10%	40%

APPENDIX A: INTERNATIONAL PRACTICE CONT'D SNAPSHOT EU-WIDE PACKAGING REGULATION. 2025

Please note, below presents a 2024/25 snapshot. Information is regularly updated on BA's website.

Some member States have already introduced or proposed measures to curb single use cups and containers, whilst promoting reuse alternatives. For example:

Country	Items	Action	Date
Germany	SUP coffee cups and food containers	All cafes and food outlets to offer reusable alternatives	January 2023
The Netherlands	SUP coffee cups and food containers	Ban on disposable cups for dine-in Fee on other plastic packaging	July 2023
France	SUP coffee cups Reusable cups and plates	Banned (compostables exempt) Mandatory reuse in restaurants	2020
Ireland	SUP coffee cups	0.25-euro fee	January 2023
Greece	SUP coffee cups and food containers	0.05-euro fee	January 2022
Portugal	SUP packaging in ready to eat meals and beverages	0.30-euro fee	July 2022
Sweden	SUP coffee cups, food containers and other packaging	Takeaway food and drink providers must offer reusable packaging	January 2024
Italy	SUP products	Plastics Tax	July 2024
Spain	SUP cups	Public events must provide reusables (with a deposit)	January 2022
Denmark	Single use packaging	Fee for disposable cups	January 2025

Product Stewardship Centre of Excellence

APPENDIX B
5 CHARACTERISTICS OF EFFECTIVE PRODUCT STEWARDSHIP

- High levels of industry or business investment and participation were essential for realising these benefits
- 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)

REUSABLE STANDARD

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 the 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 packaging should be labelled with a designated symbol and instructions for reuse.

EXAMPLE: The Boomerang Alliance and the National Retailers Association designed and proposed a reusable bag standard. The key elements are below:

- 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 packaging in the interim, only certified AS packaging items should be allowed on the marketplace.
A process of continuous improvement should be in place to ensure that AS 4736 packaging can be phased out, with AS 5810 becoming the standard.

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 is packaging on 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.

As referenced above, and to be consistent with other standards, manufacturer responsibility should be included in this standard. Manufacturers must take responsibility for the provision of collection services or negotiate with other parties on provision of such services.

All certified packaging items should be labelled with a designated symbol and instructions for recovery.

APPENDIX C
MANDATORY STANDARDS FOR REUSE, COMPOSTABLES AND RECYCLABLES (PRINCIPLE #3) CONT'D

RECYCLABLE STANDARD

Packaging 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 meet the requirements of the ARL. This would include obligations to design for recycling; provide fit for purpose packaging; and take responsibility for post-consumer recovery. It will mean accepting recycled materials back into packaging manufacturing streams.

Packaging marked as recyclable must be designed for easy and cost-effective 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 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 packaging 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 best practice design, in consultation with packaging recyclers
- Packaging is fit for purpose
- Manufacturers take 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 packaging certified to the standard with the ARL certification process broadened to incorporate these additional requirements as well as consumer instruction about collection.

The ARL certification process should 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.[6]
- **Roadmap beyond NWP 2025 targets:** a roadmap needs to be developed in line with best practice 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'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.
- **Away from home/takeaway packaging:** Most single use packaging used away from home ends up in landfill- whether recyclable or compostable. Collection infrastructure and services do not work. The Boomerang Alliance is advocating for a comprehensive reusable packaging agenda where disposable packaging is simply not available in the public place. To make a start, we have proposed that disposable coffee (beverage) cups and lids and single use food containers be phased out by 2030.
- **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 packaging targets should include a timeline for packaging that is readily recyclable, packaging that requires redesign to become readily recyclable and packaging that 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.

6 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':

8 NEW PLASTICS ECONOMY GLOBAL COMMITMENT PROGRESS REPORT OCTOBER 2019

Global Commitment

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:

1 Elimination of problematic or unnecessary plastic packaging through redesign, innovation, and new delivery models is a priority

Plastics bring many benefits. At the same time, there are some problematic items on the market that need to be eliminated to achieve a circular economy; and, sometimes, plastic packaging can be avoided altogether while maintaining utility.

2 Reuse models are applied where relevant, reducing the need for single-use packaging

While improving recycling is crucial, we cannot recycle our way out of the plastics issues we currently face.

Wherever relevant, reuse business models should be explored as a preferred option, reducing the need for single-use plastic packaging.

3 All plastic packaging is 100% reusable, recyclable, or compostable by design

This requires a combination of redesign and innovation in business models, materials, packaging design, and reprocessing technologies.

Compostable plastic packaging is not a blanket solution, but rather one for specific, targeted applications.

4 All plastic packaging is reused, recycled or composted in practice

No plastics should end up in the environment. Landfill, incineration, and waste-to-energy are not part of the circular economy target state.

Businesses producing and/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.

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.

5 The use of plastic is fully decoupled from the consumption of finite resources

This decoupling should happen first and foremost through reducing the use of virgin plastics (by way of dematerialisation, reuse, and recycling).

Using recycled content is essential (where legally and technically possible) both to decouple from finite feedstocks and to stimulate demand for collection and recycling.

Over time, remaining virgin inputs (if any) should switch to renewable feedstocks where proven to be environmentally beneficial and to come from responsibly managed sources.

Over time, the production and recycling of plastics should be powered entirely by renewable energy.

6 All plastic packaging is free of hazardous chemicals, and the health, safety, and rights of all people involved are respected

The use of hazardous chemicals in packaging and its manufacturing and recycling processes should be eliminated.

It is essential to respect the health, safety, and rights of all people involved in all parts of the plastics system, and particularly to improve worker conditions in the informal (waste picker) sector.

Find out more

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