



**City and Environment Directive
GPO Box 158
Canberra City 2601**

By email: SingleUsePlastics@act.gov.au

29 April 2026

Submission on A Circular Future for the ACT: Problematic Products and Single-Use Plastic Reduction Discussion paper

The Boomerang Alliance and our allied organisations thank you for the opportunity to provide our views on this discussion paper. We are particularly encouraged that the paper frames the use of single use products and plastics in the context of a circular economy. This is an approach that can ultimately resolve plastic pollution problems.

In addition, we welcome the emphasis on reuse as an important component of any circular economy/plastic reduction strategies. We support the phase out of problematic single-use packaging, coupled with the introduction of more reuse as an alternative to problematic food ware.

In our recent correspondence with all State and Territory Ministers (9 January 2026) we outlined our proposals on the strategic introduction of more reuse, particularly in the public place, and at 'controlled locations' where reuse could be more effectively implemented.

Our views in Summary

- **We welcome the ACT Government continuing to address problematic single-use plastics**
- **We agree on the list identified for future actions and call upon further phase-outs in collaboration with other States and Territories, and to support a national EPR Scheme for Packaging**
- **An expanded list of problematic single-use should include products that contain chemicals potentially harmful to health and the environment**
- **Non-plastic (such as paper/cardboard) single-use items should be considered in future phase-outs**
- **A Reuse Strategy should be developed to complement any single-use packaging reforms**

- **Reuse policies should focus on key locations where reuse could be effectively managed- as a starting point**
- **The government should consider similar legislation to NSW that will require businesses in ‘controlled locations’ to provide reusable food ware**
- **Introducing incentives or levies on identified single-use products should be considered**
- **Expanding the CRS to include other items and increasing the container refund to 20 cents should be initiated as a complementary measure to reduce and manage plastic waste and litter**

Background and Policy Context

We welcome the ACT Government continuing to address problematic single-use plastics and setting policies in the context of a circular economy approach. In this regard, we think that future policies should also focus more broadly on single-use packaging, paper and cardboard and other materials also have an environmental impact that should be resolved.

The Governments plastic reduction agenda quite rightly recognises the need to work towards a circular economy approach on plastic packaging. The Commonwealth CE Taskforce identifies three core practices and outcomes (1) the elimination of waste and pollution (2) the management of products through the economy based upon their highest resource values and (3) the restoration of nature. The achievement of these should be at the heart of any policies and coupled with a strategy of continuous improvement.

We note that the CE Taskforce identified circular packaging as a priority measure.

It is beneficial that the ACT agenda provides leadership and is consistent with the National Roadmap and supports all jurisdictions to deliver best practice outcomes. As Australia has committed to the 'high ambition' goals under a proposed Global Plastics Treaty, the ACT can contribute to these. Those goals include the capping of plastic production, banning of high-risk products and enforcing polluter pays principles with a circular economy.

The Commonwealth, State and Territory Governments are currently negotiating an extended producer responsibility (EPR) Scheme for Packaging. This will be based upon, as outlined in this discussion paper, mandated obligations on industry to be responsible for the packaging they place on the market.

Many respondents to the Commonwealth packing reform consultation paper highlighted the important role States and Territories can play in contributing to a mandated EPR Scheme by continuing to phase out or apply levies on problematic packaging. The ACT should continue to play its part.

There is currently a consensus position by governments, the packaging producers and suppliers, the recovery industry, environmental groups and the concerned public that a

producer responsibility model offers the best chance for a sustainable packaging future. This is an opportunity that should be taken.

According to the report on consultation to proposed Commonwealth packaging reforms, *'Over 80% of respondents preferred Commonwealth regulation of packaging and 65% support Option 3, an EPR scheme with mandatory requirements.'*
DCCEEW March 2025

A joint statement by the Boomerang Alliance, APCO, ACOR, WMRR and SPSA supports *'a mandatory national product stewardship scheme for packaging by 2026 that applies targets and producer responsibility across the life cycle, including for soft plastics.'*
March 2025

A national YouGov survey (Boomerang Alliance December 2024) found that 73% of Australians support a packaging EPR scheme and 88% support a producer-funded soft plastics collection service.

The Boomerang Alliance takes the view that a national EPR with mandatory targets coupled with State and Territory phase-outs or levies on problematic packaging is the most effective strategy to address waste and pollution going forward.

Proposed SUP Reductions

Over the last few years Australian State and Territory Governments, and including the ACT Government, have actively phased out identified problematic plastic packaging. These phase outs have included lightweight plastics bags, plastic cutlery, straws, EPS containers, oxo-degradable items, microbeads and assorted plastic foodware. Heavyweight and boutique bags being the most recent additions. These measures have significantly reduced waste and litter and changed consumer habits.

The discussion paper correctly identifies additional unnecessary and problematic plastic items. All of these items can be replaced or changed. If a Priority list is required, they should be considered on the basis of the extent of the problems they create as waste in landfill or as litter and pollution. We favour a coordinated, national approach to identifying future priority products. Non plastic single-use packaging should be included for future consideration.

We note that some of these items (below) are already regulated in other States.

- Produce bags. These should be replaced by reusable bags, either consumer or store supplied.
- Plastic bin liners. These should be phased out. Some jurisdictions allow only certified home compostable bags to encourage home composting practices whilst other have banned these.
- Plastic Flower bags. Replaced by paper. Ties should be made from natural fibre string

- Produce stickers. These are increasingly used to identify products at automatic check out so if used they should be certified home compostable or edible. We note that produce stickers are a problem waste and retailers should be responsible for finding alternative options.
- Plastic food sticks. Replaced with paper or wooden alternatives
- Pizza savers. Are they necessary? Replaced with recycled cardboard or dough (as suggested)
- Prepackaged goods with banned plastic. These need to be banned immediately (if still available). They are already banned in many States
- Soy Fish/sauce sachets. These should be banned and replaced with bottles or dispensers available at point of sale
- Bread tags. Replace with recycled card. This is already happening in most supermarkets.
- Confetti. An obvious unnecessary plastic item that, due to the circumstances of its use, represents a litter problem. Avoid confetti, use flowers/petals or only allow paper
- Cigarette butts. We strongly support a national approach to ban the use of filters on cigarettes. Smokers can return to pre-filter days and use their own reusable cigarette filters. These are now readily available.
- Helium balloon releases. All releases should be banned given the impact on wildlife from discarded balloons. Helium is a scarce resource, and its use should be prioritised to health and designated industrial/electronic applications.

Chemical additives into packaging remain a concern for both potential health impacts and environmental contamination. We note that PFAS contamination has still not been adequately addressed in recyclable packaging. Packaging that includes potentially harmful chemical additives should be included for future regulation.

Takeaway disposable cups and containers used in the public place, represent a growing challenge that needs to be addressed. Increasingly these products are being wasted and not accepted in public place recycling. This is largely due to these products not being designed with cost-effective recovery in mind, inadequate collection, confusing messaging and poor habits by some consumers.

For example:

- Paper cups (and to be fit for purpose usually includes plastic-lining)
- 'Recyclable' coffee cups and lids (collected but not usually recycled due to multiple polymer and materials used)
- 'Recyclable' food containers (represent the same challenges as coffee cups/lids)
- Compostable coffee cups with aqueous coating a solution with suspended plastic particles that can become a microplastic problem)
- Compostable items (not accepted by recyclers or composters due to contamination concerns and often not composted due to a lack of adequate and dedicated collection)

We propose (below) that a focus on reusable coffee cups and food containers offers a better future options.

To date most of the focus on single use packaging has been directed at its use in the public place hospitality sector and in some retail locations. This needs to continue. However, there are sectors where single use packaging remains a concerning problem. We recommend that the ACT considers specific policies to address packaging use in these other sectors.

- Health and hospital sector
- Fast food restaurants and mobile takeaway services
- Non-food, general retail
- Sports and Outdoor Recreation activities
- Online merchandise and delivery services

An EPR should be designed to resolve packaging problems in these sectors. However, as the Boomerang Alliance has identified through its Plastic Free Places program, significant progress and benefit can be achieved for these sectors by anticipating the challenges they may face and actively providing tailored solutions to resolve these. ACT policies directed at these sectors can play an important role in this regard.

What incentives/disincentives are most effective

As outlined we support regulations to phase out problematic packaging. This approach has proven to be effective for plastic straws, cutlery and other products. The introduction of a CRS has significantly increased container recovery and reduced litter.

In Europe a number of countries have/are considering either bans or levies on single-use problematic products.

Country	Items	Action	Scheduled 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 (exemption for compostables) 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
Scotland	SUP coffee cups	25 pence fee	2025
Berkeley/Santa Cruz+, California	SUP coffee cups	25 cents fee	2020 onwards
California	SUP Cups	Require reusables cups for dine-in at restaurants and cafes	proposed
McDonalds UK, Burger King US	SUP coffee cups	Trialling returnable cup systems	current
All Starbucks EU/Africa/Middle East	SUP coffee cups	Offering reusable cups share	2025
Seoul, South Korea	SUP coffee cups	Trial Reusable cups with deposit system Fee for s disposable cups	2022 2025

Reuse-a Strategic Approach

The Boomerang Alliance proposes that the ACT develops a Reuse Strategy to complement its reduction policies. A reuse strategy will allow a switch away from current single use practices and managed in a way that transitions current consumer behaviour.

For reuse to be successfully introduced the circumstances in which plastic food ware is used needs to be considered. Reuse is most easily achieved in 'controlled environments', locations where a reuse system can be managed well. The most obvious places are at sports stadiums, events, offices, public facilities, clubs and tourist attractions, hospitality precincts and transport services. All these locations are centrally managed and have the means to introduce reuse, and a system to manage this.

Similarly, retailers, particularly supermarkets, could introduce more reusable packaging. Obvious opportunities include at the delicatessen counter where customers could be provided with reusable containers under a return or deposit system. Certain products, cleaning, personal care, dried cereals etc could also be provided through bulk dispensers or in returnable/reusable containers. Delivery services should provide reusable/returnable containers.

To be effective, reuse needs to be managed within a system that can ensure that containers are designed to be reusable and are actually returned for reuse. The key components of a system include:

- Products designed to be reused for a minimum number of reuse cycles
- Point of sale arrangements to ensure consumers are incentivised to return (e.g. convenience, deposits or penalty system)
- Adequate and efficient, user-friendly collection points/services for return
- Commercial washing facilities (if required)
- Logistics to ensure containers are returned for reuse, and overall management of system

With respect to food ware items the discussion paper outlines products such as takeaway coffee cups, cold cups and food containers, these could more effectively be addressed by facilitating reuse alternatives and based upon the circumstances they are used.

Places such as cafes, stadiums, events, offices, public facilities and tourism attractions and on boats, planes and trains. Locations such as Canberra Airport, where our recent experience was that we could even get a reusable cup for dine-in.

A YouGov poll (commissioned by Boomerang Alliance in December 2024) found that most Australians supported reuse cups and containers at cafes (65%) no disposables for dine-in (60%), employers offering reuse cups and containers to staff instead of takeaway (59%) and reuse at stadiums (54%).

Even a future ban on all disposable cups for takeaway received majority support (51%).

We propose that the ACT look to regulating food ware reuse at these controlled locations as a strategy to address and reduce single use. That would mean:

- Banning disposable food ware at dine-in at restaurants and cafes
- Requiring large food service providers (eg at stadiums, events, food courts) to provide reusable cups and containers as part of a reuse system
- Establishing reuse precincts at high volume hospitality locations (that can be managed)
- Setting up reuse services at government and corporate offices for staff. ACT Government facilities could lead this change.

- Introducing strategies and strategic investments to engage business, tourism, transport and retail locations to switch (and starting with cups and containers)
- Encouraging supermarkets to introduce more reuse containers (personal care/ cleaning/dried food) and consumer services at delicatessens

We note that WA Government regulations have led to the two major stadiums in Perth already switching to reuse cups. ENGIE stadium in Sydney uses reuse cups, provided by WOSUP. We note that these services are available when GWS play at Manuka Stadium.

All stadiums in the Bundesliga in Germany (52 in total) provide reuse cups. This is an outcome of Germany's Mehrwegpflicht (Reusable Packaging Act), introduced in 2023 that requires food services to offer/provide reusable food ware for takeaway purposes.

Similar legislation is currently before Parliament in NSW. This includes requirements on food service providers to supply reusable cups as part of a reuse service, proposed reuse-only precincts and will prohibit providers from charging extra for reusables.

Attached is our example list of locations providing reuse overseas and in Australia.

Locations offer reuse should be mindful of providing the services that make reuse achievable. For instance, a stadium providing reusable cups needs to set up a system to be able to monitor/charge a deposit at point of sale, provide adequate collections and commercial washing facilities to enable the return of cups.

A future next step that should be considered, is a community-wide reuse system for reusable cups and containers used in the public place. This will involve multiple businesses and locations operating within the same or integrated system. Many of these community/city-wide systems are emerging in Europe. The TOMRA system in Aarhus (Denmark) and Lisbon (Portugal) are two examples highlighted in the Discussion Paper. Berlin has taken a similar approach.

Cafes in Bermagui (NSW) have independently switched to reusable coffee cups for takeaway and the Boomerang Alliance is currently trialling a reuse system in Port Douglas (QLD) with funding support from the State Government and Douglas Shire Council. We believe community-wide reuse will increasingly become common practice.

The ACT could encourage this approach through reuse precincts and providing funding support to cafes interested in providing reusables to their customers.

For events and markets, organisers can switch to reuse and provide washing facilities. There are businesses that offer these services. There are mobile washing services currently available (Eco trilogy offer these services to councils in NSW) or provide on-site services delivered by a community group (with a service fee).

The Boomerang Alliance has identified a number of existing service providers who can provide reuse systems in the public place and at ‘controlled locations’. We have held business roundtables with Sustainability Victoria, the NSW EPA, major venues and reuse service providers to investigate these opportunities. The clear outcome from these events has been the readiness of participants to develop reuse initiatives, given jurisdictional support.

We propose that the ACT Government consider such an approach in the Territory.

The Boomerang Alliance through its Plastic Free Places program has developed expertise in public place reuse and in many of the controlled locations we have identified. We would be happy to assist the ACT Government where we can on these matters.

In conclusion, we look forward to the ACT Government implementing its proposed single-use plastic reductions and commend the government on its initiatives to both reduce problematic single-use plastics and encourage more reusables.

Additional information

CERCLE

Cercle provides a seamless reusable cup and collection service tailored for corporate environments. Through their circular system, office staff can enjoy a takeaway coffee from nearby participating cafés in a CERCLE reusable cup. Once finished, the cups are collected directly from the office and transported to CERCLE's specialised washing facilities, where they are sanitised and returned to the cafés to begin the cycle again.

To date, the CERCLE system has been established at a number of corporate offices in Sydney, Melbourne and Brisbane. They estimate that since April 2021, they have successfully diverted over 1.5 million single-use coffee cups from landfills.

WOSUP (War on Single Use Plastic)

WOSUP work primarily in stadiums and large events offering reusable cups for patrons. If you head to ENGIE stadium to see the GWS Giants, Australian Turf Club events or the Royal Easter Show, it's likely that you have used a WOSUP aluminium cup. Collected cups are washed and returned to venues for the next event. WOSUP is planning to expand to other large venues and into Europe where reuse is becoming the norm. WOSUP estimates that Australian stadiums and venues use up to 50 million single use cups a year, switching to reuse would make a massive impact.

TOMRA

Tomra are best known in Australia for Reverse Vending machines at container refund depots. In Europe they also run reuse cups services for cafes and hospitality venues. In Aarhus (Denmark) and Lisbon (Portugal) for example, reusable cups are offered to the public at cafes and bars. Cups are collected on site or through collection pods. A small deposit is charged during purchase and refunded when the cup is returned.

Bettercup

Bettercup manage reuse at large public events and festivals such as WOMAD (Adelaide). The Bettercup team has worked with over 2000 events here and in New Zealand. It's a simple system offering patrons a reuse cup at the bar that can be collected on site, washed and returned for reuse. Bettercup helped set up the FiilGood service in Wellington which offers reuse cups, food trays for public events in the city.

ATTACHMENTS

Choose to reuse report-Boomerang Alliance
Reuse at Stadiums and major Events-Boomerang Alliance
Factsheet on EPR model-Boomerang Alliance
Reuse Place list 2025-Boomerang Alliance