

**INQUIRY INTO WASTE AVOIDANCE AND RESOURCE  
RECOVERY AMENDMENT (PLASTICS REDUCTION)  
BILL 2021**

**Organisation:** WWF Australia  
**Date Received:** 3 May 2021

---



AUSTRALIA

## Waste Avoidance and Resource Recovery Amendment (Plastics Reduction) Bill 2021

### WWF Australia submission

WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature. WWF is active in more than 100 countries and has more five million supporters worldwide.

Our organisation has a global goal of no plastic in nature by 2030. To this end, WWF seeks to reduce the amount of plastic in the system; increase re-use and reprocessing to maximise its value; and eliminate leakage of plastic into nature.

WWF-Australia welcomes the introduction of the *Waste Avoidance and Resource Recovery Amendment (Plastics Reduction) Bill 2021* and the opportunity to provide feedback on the Bill's provisions to the Legislative Council's Portfolio Committee No. 7 – Planning and Environment.

Our organisation strongly supports legislative measures to address the problem of plastic pollution at source. As such we strongly support the Bill's objectives which address not only the threat presented by plastic pollution, but the need to support more conscious production, consumption and waste minimisation and management, in line with circular economy and waste hierarchy principles.

This submission does not provide technical expertise on the feasibility of phasing out certain products from an industry or technical perspective. WWF-Australia collaborates closely with industries and companies with demonstrable commitment to and a track record in tackling plastic reduction and pollution. Our view is that reform should prioritise environmental outcomes and drive change within the shortest feasible timeframe, informed by a wide range of stakeholders.

### Phasing out unnecessary and problematic plastics

Single-use plastic items are a major and destructive source of ocean plastic pollution due to their small size, low residual value and disposable nature<sup>1</sup>. As reflected in Australia's National Plastics Plan, the simplest way to manage plastic waste is to create less of it in the first place<sup>2</sup>. Phasing out single-use plastics has the potential to substantially lower plastic demand and plastic pollution. For this reason, many jurisdictions internationally are phasing out problematic single-use plastics.

---

<sup>1</sup> Rochman, C., Browne, M., et al. L.A. (2016). The ecological impacts of marine debris: unravelling the demonstrated evidence from what is perceived. *Ecology*. 97(2), 302–312.

<sup>2</sup> Department of Agriculture, Water and the Environment. (2021). National Plastics Plan 2021. Canberra.

To assess progress in Australia, WWF-Australia developed [Australia's plastics scorecard](#), which assesses individual jurisdictions' progress in phasing out the most problematic and unnecessary single-use plastics. Since the first scorecard was published in 2019 there has been substantial progress across Australia in introducing policies and legislation to tackle plastic pollution at source.

Our 2020 scorecard assessed NSW as 'catching up' to three jurisdictions that have made substantial progress, namely Queensland, the ACT and South Australia. Our assessment identified no action from the NSW Government on plastic packaging and single-use coffee cups and lids, and limited action on a range of other single-use plastic products.

Substantial progress has been made since the last scorecard was published, with additional states pledging further action on a range of single-use plastics. NSW has been among the jurisdictions making significant progress and WWF-Australia strongly supports the measures contained in *Cleaning Up Our Act: Redirecting the Future of Plastic in NSW* that are currently under consideration<sup>3</sup>. WWF-Australia notes that many of the elements likely to be included in the forthcoming Plastics Plan are addressed by the Bill.

## Scope of plastics

WWF-Australia believes the following items should be prohibited from being placed on the market: single-use plastic bags, microbeads, coffee cups and lids, plastic plates, plastic straws and stirrers, plastic cutlery, single-use plastic containers and packaging, and balloon sticks. These items reflect those covered by the EU's single-use plastics Directive<sup>4</sup>, are frequently found on Australian beaches, and present a threat to seabirds, turtles and marine animals.

WWF-Australia also supports a ban on polystyrene containers and oxo-degradable plastics. Polystyrene products are one of the most common plastics found in the environment because they are not biodegradable, are highly contaminated by food products and are difficult to recycle.

Finally, cellulose acetate cigarette filters continue to be the most-littered item in Australia, taking up to 15 years to degrade, and posing a significant threat to wildlife as well as an environmental pollutant<sup>5</sup>. Introduced in the 1950s, filters offer no health benefits and public health experts believe they may increase risk to smokers<sup>6</sup>.

**Recommendation 1:** The comprehensive range of problematic single-use plastics captured by section 48D should be retained, along with the ability to prescribe additional types of plastic waste through regulation.

## Packaging targets

---

<sup>3</sup> NSW Government. (2020). *Cleaning Up Our Act: Redirecting the Future of Plastic in NSW*.

<sup>4</sup> Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment. Official Journal of the European Union. 2019. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L0904> (Accessed 30 April 2021)

<sup>5</sup> Joly, F. & Coulis, M. (2018). Comparison of cellulose vs. plastic cigarette filter decomposition under distinct disposal environments. *Waste Management*. 72, 349-353.

<sup>6</sup> Greenhalgh, E., Scollo, M. & Winstanley, M. (2020). *Tobacco in Australia: Facts and issues*. Melbourne: Cancer Council Victoria.

WWF-Australia supports mandatory packaging targets as the optimal means for creating an incentive to build collection and recovery infrastructure, and an incentive to avoid leakage of plastic into our natural environment. Voluntary frameworks have been in place in Australia for 20 years and continuing to rely on these will not drive the market quickly enough to address issues of product recyclability<sup>7</sup>.

WWF believes these targets should be incorporated into the *Product Stewardship Act 2011* (Cth). In the absence of mandatory targets in the Act, we support the inclusion of these targets in state and territory legislation. Container deposit and plastic bags legislation has clearly demonstrated the effectiveness of legislative measures to reduce plastic pollution within jurisdictions.

**Recommendation 2:** WWF-Australia supports the inclusion of clear targets and timeframes as specified in section 48D. Specifically, we support section 48D(d) requiring 100 per cent of all packaging to be reusable, recyclable, or compostable by 2024. We also commend the inclusion of a specific target for the recycled component in plastic packaging included at section 48D(e).

## Accountability mechanisms

WWF's global objective is to eliminate the leakage of plastic into nature by 2030. We support the Bill's ambitious target of eliminating plastic pollution by 2025, and clear interim targets aimed at driving progress towards this target. We note, however, the importance of balancing viability and ambition, and note that some of the elimination target dates may require further consideration.

WWF-Australia supports the establishment of a Plastics Reduction Commission and the development of a threat abatement plan in relation to plastic pollution. This plan should complement the Australian Government's threat abatement plan for the impacts of marine debris on the vertebrate wildlife of Australia's coasts and oceans<sup>8</sup>, in addition to addressing specific issues and solutions for NSW to pursue. The accountability measures contained in section 48J are welcomed.

**Recommendation 3:** We recommend retaining provisions for the Plastics Reduction Commission and plastic pollution threat abatement plan, and further consultation on elimination target dates.

## Conclusion

The world's oceans are at risk of being overrun by plastic. Each year, up to 130,000 tonnes of plastic enters Australian oceans and waterways, presenting a devastating threat to our natural world, marine life and human health<sup>9</sup>. Based on current levels of pollution we are likely to see 99 per cent of seabirds ingesting plastic<sup>10</sup>, and more plastic in the ocean than fish (by weight) by 2050<sup>11</sup>.

---

<sup>7</sup> WWF-Australia. (2019). Submission to the Product Stewardship Amendment (Packaging and Plastics) Bill 2019.

<sup>8</sup> Department of Environment and Energy. (2018). Threat abatement plan for the impacts of marine debris on the vertebrate wildlife of Australia's coasts and oceans.

<sup>9</sup> WWF and BCG. (2020). Plastic Revolution to Reality – A roadmap to halve Australia's single use plastic litter.

<sup>10</sup> Chris Wilcox, C., Van Sebille, E. & Hardesty, B. (2015). Threat of plastic pollution to seabirds is global, pervasive, and increasing. *PNAS*. 112(38).

<sup>11</sup> Ocean Conservancy and McKinsey Center for Business and Environment. (2015). Stemming the Tide: Land-based strategies for a plastic-free ocean.

Effective waste management and strong accountability measures can help to reduce plastic pollution and its impacts<sup>1213</sup>. WWF-Australia advocates a coordinated, national approach to tackling plastic pollution, including phasing out unnecessary and problematic single-use plastics, mandatory packaging targets, and strong accountability mechanisms. We welcome Australia's National Plastics Plan as an important step forward.

However, states and territories have historically been at the forefront of managing their own plastic waste streams and there is significant potential for expertise and systems at this level to reduce pollution, and drive innovation and behaviour change. NSW is yet to introduce strong measures to comprehensively tackle plastic pollution that are now in force in numerous jurisdictions. This Bill makes a positive contribution to this process and includes strong accountability mechanisms necessary to effectively tackle plastic pollution.

WWF-Australia looks forward to working with the Portfolio Committee No. 7 – Planning and Environment on this issue. For further information, please feel free to contact Kate Noble, No Plastic in Nature Policy Manager, on \_\_\_\_\_ or \_\_\_\_\_

---

<sup>12</sup> Op cit.

<sup>13</sup> WWF and BCG, *ibid*.