

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

Organisation: Tetra Pak
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Portfolio Committee 7

Inquiry into the Waste Avoidance and Resource Recovery Amendment (Plastics Reduction) Bill 2021

Via email to: portfoliocommittee7@parliament.nsw.gov.au

Dear Members of the Committee,

Tetra Pak would like to submit the following in response to your inquiry on the *Waste Avoidance and Resource Recovery Amendment Bill 2021*. We understand the formal consultation period has ended, however, as a stakeholder, we would like to request you consider our position on the bill.

Tetra Pak is a leading food processing and packaging solutions company, committed to circular economy principles. Our goal is to continue to reduce packaging waste and increase recycling to enable our packaging to be transformed into a resource in a circular economy.

Tetra Pak understands the bill aims to phase out single-use plastics by 2025. We fully support a considered and staged plan to phase out problematic plastics in New South Wales. However, we have some concerns regarding the narrow scope of exemptions, limited to unspecified exemptions for health or access-related concerns, and the feasibility of the proposed timelines.

On-Pack Plastic Straw Exemption

We note the bill mentions exceptions for single-use plastics that meet the access needs of people who, because of a physical or other condition, need the items to be able to eat or drink safely, independently and in comfort, or that are required for medical, therapeutic or health-related purposes.

We respectfully submit to the Committee that plastic straws remain necessary in some situations and cannot yet be replaced with alternatives.

The straws attached to some of our on-the-go beverage cartons fulfil the above criteria, viz, there are currently no food-safe, viable alternatives to these “on-pack” straws. These on-pack straws must be:

- Strong enough to perforate the carton,
- Easy to use, and
- Last long enough (i.e. be significantly moisture resistant) for consumers to finish their milk or juice without disintegrating.

They are also manufactured to the highest levels of food safety and undergo the same rigorous tests as our packaging material, unlike many of the large straws found in food service settings today.

Portion-sized drinks are also usually consumed by children, the elderly and others who may have physical limitations. Therefore, unlike large plastic straws, on-pack straws are an integral part of a packaging system that is both safe and functional.

On-pack straws are essential to portion-sized beverage cartons and are attached at the point of manufacture of the packaging. Both straw and beverage carton form a single, integrated packaging unit to deliver nutrition to the consumer. We submit that there is no competing packaging method that provides the same combination of ease-of-use and food hygiene as this overwhelmingly popular integrated pack-and-straw configuration.

Finally, these portion-sized, carton packages with on-pack plastic straws use significantly less plastic than most other low-volume liquid food packaging alternatives and have a lower climate impact than most other similarly sized packaging formats available.

We request plans to reduce plastic straws explicitly **exempt on-pack straws from proposed amendments and legislation at this time and give us sufficient time to deploy a plastic straw alternative.** We made a similar submission to the Government of South Australia and an exemption has been granted from the state's recently enacted single-use plastics waste avoidance bill.

Timelines

The bill includes timelines for eliminating specific types of plastics in New South Wales. Tetra Pak believes the significant research, development and safety testing that is required for alternatives to plastics used in food packaging could mean many producers will be unable to meet these deadlines, leading to issues in supply or quality. A detailed and material-specific consultation will be required to understand the current status of replacing different plastics for food and beverage use.

Government Strategy

Tetra Pak has participated in consultation with the NSW Government on its development of the *Plastics Action Plan* and the *Future of Waste and Resource Recovery in NSW*. We believe the action the government is taking is the right direction and we commend the government for its in-depth public consultation on these important issues. We therefore submit that legislation designed to reduce problematic or single-use plastics be drafted in line with the *Plastics Action Plan* and the existing *20-Year Waste Strategy*. This provides industry with confidence to make the right investments to meet the 2025 National Packaging Targets and other existing industry commitments to reduce waste in Australia.

In Summary

Tetra Pak applaud members of the NSW Parliament for taking action on plastic waste. For the benefit of consumers and our industry, we request an explicit exemption for on-pack straws, further consultation on any timelines to allow enough time to complete proper research, development and safety testing of alternative plastic packaging, and a prioritisation of the Government's *Plastics Action Plan* and *20-Year Waste Strategy*.

As a stakeholder with a strong interest in the circular economy, we have previously engaged with the NSW Government on this issue and would like to be included in any further consultation on this topic. Tetra Pak is happy to share with you our experiences with plastic bans in other jurisdictions in Australia and around the world at any time.

We look forward to continuing our engagement with New South Wales to advance its environmental initiatives.

Sincerely,

Allison Lim
Director, Public Affairs, Asia-Pacific