Our Ref: BM | LR

3 October 2024

Plastic Policy Team
Waste and Resource Recovery
Department of Natural Resources and Environment

**Via email:** PlasticsPolicy@nre.tas.gov.au

Dear Plastics Policy Team

**Phasing out Problematic Single-Use Plastics**

Thank you for the opportunity to provide a submission on the Phasing out problematic single-use plastics discussion paper. This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of Tasmanian local government in collaboration with our members; all 29 councils.

LGAT is incorporated under the *Local Government Act 1993* and is the representative body and advocate for local government in Tasmania. Where a council has made a direct submission to this process, any omission of specific comments made by that council in this submission should not be viewed as lack of support by LGAT for that specific issue.

The local government sector broadly welcomes the State Government's initiative to phase-out single use plastics. However, phase-out implementation must be considered now, at the design stage, rather than at draft legislation stage.

Please contact Ben Morris, Policy Director, if you have any questions or would like further information, at ben.morris@lgat.tas.gov.au or 6146 3743.

Yours sincerely,

**Chief Executive Officer**

## LGAT Submission: Phasing out problematic single-use plastics

### Introduction

Tasmanian local government is a strong supporter of phasing out problematic single use plastics, where there are suitable alternatives and appropriate regulation and education is provided.

Our members have previously resolved that LGAT:

- *Lobby the State Government for the introduction of legislation to phase out the provision of petroleum-based single-use take-away food packaging currently used to enable prepared food or beverages to be carried from the retailer's premises (2018).*
- *Lobby the State Government to complete a state-wide Waste Strategy that includes Policy and Legislation that will phase out single use plastics across the State and support the establishment of regional composting facilities (2019).*

We note, in particular, the 2019 resolution that also called for the support to establish composting facilities in part to manage the increased waste stream with compostable packaging replacing plastics.

Our submission does not address the specific items listed in the Discussion Paper. Although we note that flexible packaging, typically food, is a significant litter issue and resource recovery challenge and is not addressed in this reform. The Australian Government is progressing this with its flexible packaging program, but similarly to this reform appears to have limited consideration of the full supply, recovery and reprocessing cycle.

### Implementation

**Regulatory capacity and capability**

The list of potential plastic items for phase-out is a useful starting point to progress the elimination of these items from the supply chain and prevent them entering the environment. However, consideration of implementation is also critical to assess which items will be phased out and when. For example, removing microbeads in personal healthcare is likely more difficult than take-away food and beverage containers due to the supply chains involved.

Deferring detailed consideration of implementation until the draft legislation phase is concerning to local government. Councils are under financial and resource pressure and cannot take on new responsibilities.

Regulation is most effective and efficient when it can be applied as far up the supply chain as possible as there are fewer points of compliance and firmer regulatory measures can be applied. In order of effectiveness and regulatory effort the following implementation is required:

- ban items from being manufactured
- ban items from being imported
- ban items from being sold at wholesale
- ban items from being used with manufactured goods
- ban items from being sold at retail
- ban items from secondary retail as packaging for food and beverage, or other consumables.

These ordered regulatory steps must be supported by an ongoing education and behaviour change campaign. This needs to be the why the change is needed, how it is going to happen and the steps they need to take. This is required for businesses and consumers to change their perceptions and use of plastics and to support the alternatives. Local government can play a supporting role in education, for example Environmental Health Officers passing on guidance information to businesses as part of their routine inspections, or through their customer centres. However, unless there is specific resourcing, councils cannot pick up an additional role in regulation.

**Transition support for businesses**

Small businesses are central to many, if not all, municipalities around the state. They provide jobs, play a role in local economies, as well as social connection. They are under pressure in the current high cost of living environment and typically have limited time to understand and research alternatives. They will need direct support to make the shift to alternative products, likely best undertaken with their relevant industry body.

The State Government must lead the education campaign, including through broad multi-channel messaging and providing materials that can be used locally by businesses to build understanding for the phase-out.

**Resource recovery**

It is important that as we shift away from single-use plastics to alternatives, the organic materials do not end up landfill. It would be unfortunate that shifting to these materials creates additional greenhouse gases as the organic products are disposed in landfill. The State Government needs to work closely with councils, regional waste authorities and the private market to develop organics processing capacity and end markets for the compost.