

Green Industries SA

TURNING THE TIDE 2021

The future of single-use plastic in South Australia Discussion Paper

Consultation Response Document

4 July 2022



CONTENTS

1.0 EXECUTIVE SUMMARY	6
1.1 INTRODUCTION	6
1.2 COMMUNITY RESPONSES	6
1.3 GOVERNMENT, NGOs, SHARED INTEREST, WASTE & RESOURCE RECOVERY, AND INDUSTRY STAKEHOLDERS' RESPONSES	7
1.3.1 Should South Australia consider banning or restricting this product group?	7
1.3.2 Are there viable alternatives, and if so, what are they?	8
1.3.3 What sort of exemptions, if any, may be needed?	8
1.3.4 What are the health, economical, logistical or social issues that should inform any decisions?	8
1.3.5 What sort of timeframes should be considered?	9
1.3.6 How long would business, industry and supply chains need to prepare?	9
1.3.7 Other items, actions and suggestions from these stakeholders	10
2.0 CONSULTATION RESPONSE	11
2.1 INTRODUCTION	11
2.1.1 THANK YOU	12
2.2 HOW WE CONSULTED	12
2.2.1 CONSULTATION CHANNELS	12
2.2.2 PARTICIPANTS AND SUBMISSIONS	13
2.2.2.1 Community responses	13
2.2.2.2 Government, NGOs, Shared Interest, Waste & Resource Recovery and Industry stakeholders	13
2.3 WHAT YOU TOLD US	15
2.3.1 THE COMMUNITY	15
2.3.2 GOVERNMENT, NGOs, SHARED INTEREST, WASTE & RESOURCE RECOVERY AND INDUSTRY STAKEHOLDERS	18
2.3.2.1 Should South Australia consider banning or restricting this product group?	18
2.3.2.2 Are there viable alternatives, and if so, what are they?	19
2.3.2.3 What sort of exemptions, if any, may be needed?	21
2.3.2.4 What are the health, economical, logistical or social issues that should inform any decisions?	22
2.3.2.5 What sort of timeframes should be considered?	23
2.3.2.6 How long would business, industry and supply chains need to prepare?	25
2.3.2.7 Other items, actions, and suggestions from the Industry stakeholders	26
3.0 DETAILED FEEDBACK	29
3.1 THE SOUTH AUSTRALIAN COMMUNITY	29
3.1.1 SOURCES OF FEEDBACK FROM THE SOUTH AUSTRALIAN COMMUNITY	29

3.1.2 THE ONLINE PUBLIC SURVEY VIA ‘YourSAY’ PLATFORM AND SURVEY MONKEY, COMPARED WITH THE ONLINE PANEL SURVEY	29
3.1.2.1 Supporting the intervention to address environmental problems from single-use plastics	30
3.1.2.2 Single-use plastic products that should be considered for future bans	31
3.1.2.3 Opinions of exemptions to single-use plastic bans.....	38
3.1.2.4 Alternatives to single-use plastics	41
3.1.2.5 Additional measures to reduce the impact of single-use plastic bags.....	41
3.1.2.6 Preparedness to choose reusable containers for food and beverages	42
3.1.2.7 Current food waste recycling habits	43
3.1.3 OPEN COMMENTS VIA ‘YourSAY’ PLATFORM & EMAIL	45
3.1.3.1 Should South Australia consider banning or restricting this product group?	45
3.1.3.2 Are there viable alternatives, and if so, what are they?	45
3.1.3.3 What sort of exemptions, if any, may be needed?	46
3.1.3.4 What are the health, economic, logistical or social issues that should inform any decisions?	46
3.1.3.5 What sort of timeframes should be considered?	46
3.1.3.6 How long would businesses, industry and supply chains need to prepare?	46
3.1.3.7 Other areas suggested for focus.....	46
3.2 GOVERNMENT, NGOs, SHARED INTEREST, WASTE & RESOURCE RECOVERY AND INDUSTRY STAKEHOLDERS	50
3.2.1 FEEDBACK FROM THE STATE AND LOCAL GOVERNMENT SECTOR	50
3.2.1.1 Should South Australia consider banning or restricting this product group?	50
3.2.1.2 Are there viable alternatives, and if so, what are they?	51
3.2.1.3 What sort of exemptions, if any, may be needed?	52
3.2.1.4 What are the health, economic, logistical or social issues that should inform any decisions?	53
3.2.1.5 What sort of timeframes should be considered?	54
3.2.1.6 How long would businesses, industry and supply chains need to prepare?	56
3.2.1.7 Other items, actions, and suggestions by these respondents	56
3.2.2 FEEDBACK FROM NON-GOVERNMENT ORGANISATIONS (NGOs) AND SHARED INTEREST GROUPS.....	61
3.2.2.1 Should South Australia consider banning or restricting this product group?	61
3.2.2.2 Are there viable alternatives, and if so, what are they?	61
3.2.2.3 What sort of exemptions, if any, may be needed?	62
3.2.2.4 What are the health, economic, logistical or social issues that should inform any decisions?	63
3.2.2.5 What sort of timeframes should be considered?	64

3.2.2.6 How long would businesses, industry and supply chains need to prepare?65

3.2.2.7 Other items, actions, and suggestions by these respondents66

3.2.3 FEEDBACK FROM WASTE AND RESOURCE RECOVERY ORGANISATIONS73

3.2.3.1 Should South Australia consider banning or restricting this product group?73

3.2.3.2 Are there viable alternatives, and if so, what are they?74

3.2.3.3 What sort of exemptions, if any, may be needed?76

3.2.3.4 What are the health, economic, logistical, and social issues that should inform any decisions?.....76

3.2.3.5 What sort of timeframes should be considered?77

3.2.3.6 How long would businesses, industry and supply chains need to prepare?77

3.2.3.7 Other items, actions, and suggestions by these respondents78

3.2.4 FEEDBACK FROM THE BUSINESS AND INDUSTRY SECTOR79

3.2.4.1 Should South Australia consider banning or restricting this product group?80

3.2.4.2 Are there viable alternatives, and if so, what are they?81

3.2.4.3 What sort of exemptions, if any, may be needed?83

3.2.4.4 What are the health, economic, logistical or social issues that should inform any decisions?84

3.2.4.5 What sort of timeframes should be considered?91

3.2.4.6 How long would businesses, industry and supply chains need to prepare?92

3.2.4.7 Other items, actions, and suggestions by these respondents94

APPENDIX..... 104

Appendix 1: GISA Questionnaire 104

References and End Notes 109

FIGURES AND TABLES

Figure 1: Snapshot of the invitation to engage and provide feedback from the YourSAY platform 11

Figure 2: Front cover of discussion paper 12

Figure 3: Front cover of discussion paper 29

Figure 4: Do you support intervention to address environmental problems from single-use plastic products, like bags and takeaway coffee cups? 31

Figure 5: Select the single-use plastic items you think should be prohibited..... 33

Figure 6: Do you think any of these single-use plastics might require an exemption? 39

Figure 7: Which items might require an exemption? 40

Figure 8: What alternatives to single-use plastic do you prefer?..... 41

Figure 9: Should all shopping bags be certified compostable only? Should all fruit & veg bags be certified compostable only? 42

Figure 10: Would you be prepared to choose a reusable product for food and beverages (cups and containers)? 43

Figure 11: Do you recycle your food waste in your green bin using a compostable bag and kitchen 'caddy'?..... 43

Table 1: Do you support intervention to address environmental problems from single-use plastic products, like bags and takeaway coffee cups?	15
Table 2: Select the single-use plastic items you think should be prohibited	15
Table 3: Do you think that any of these single-use plastics might require an exemption?.....	16
Table 4: What alternatives to single-use plastic do you prefer?	16
Table 5: Should all shopping bags be certified compostable only? Should all fruit & veg bags be certified compostable only?	17
Table 6: Summary of all suggested viable alternatives	21
Table 7: Are there any other items you think should be prohibited? Summary of the GISA survey respondents' suggestions	35
Table 8: Are there any other items you think should be prohibited? Summary of the general population survey responses.....	37
Table 9: Summary of suggested viable alternatives from the State & Local Government submissions	52
Table 10: Summary of suggested viable alternatives from the NGOs and Shared Interest Group submissions	62
Table 11: Summary of suggested viable alternatives from the Waste and Resource Recovery submissions	76
Table 12: Summary of suggestions for viable alternatives from Business and Industry submissions	83

1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

Between December 2021 and February 2022, South Australians were invited to engage with Green Industries SA (GISA) and provide feedback on GISA's discussion paper *Turning the Tide 2021: The future of single-use plastic in South Australia*. This discussion paper sought to receive community and industry input to help consider future stages of single-use plastic product phase-outs and the timing of these.

The consultation was held across a range of different channels to ensure that feedback methods were accessible to a wide variety of stakeholders. At its close in February 2022, GISA received 3,358 submissions, comments, survey responses and emails from members of the public. In addition, 29 written submissions were received from government, NGOs, Shared Interest, Waste & Resource Recovery, and industry stakeholders.

GISA thanks the individuals and organisations for their feedback and suggestions, and we will employ this to provide sensible strategies and timelines for the future implementation of the *Single-use and Other Plastic Products Act 2020*.

1.2 COMMUNITY RESPONSES

Two surveys administering the same lines of enquiry were conducted; the GISA survey via the YourSAy engagement platform, which was open to any South Australian desiring to provide feedback on the discussion paper, and the second drew responses from a paid panel of South Australians aged 18 and over. The purpose of these 2 surveys was to compare the YourSAy responses to the GISA survey with those gathered from a representative sample of the general population.

While there were differences in the strength of support for further intervention to address the problems caused by single-use plastics (97% GISA survey, 86% general population survey), the majority of respondents to both surveys were in favour of this government-led undertaking.

This majority in both surveys supported extended to banning all 14 of the surveyed items. In addition, other items and categories were suggested for inclusion, for example food bags, non-food packaging.

The topic of exemptions to the next stages of prohibitions is one which demonstrated diverse opinions, with 64% of the GISA survey respondents not in support of any exemptions and 44% of the general population respondents. Among the GISA survey respondents, 14% supported exemptions and 22% were unsure. Among the general population respondents, 23% supported exemptions and 33% were unsure.

Most of these respondents (64% GISA survey and 57% general population survey) preferred either compostable or recyclable alternatives to single-use plastics. The next-most frequently preferred alternative was that of certified compostable that can go in a green bin (33% GISA survey and 20% general population survey) and 13% of those responding to the general population survey demonstrated preference for only recyclable that can go in a yellow bin (1% of the GISA survey selected this option).

It was clear that most respondents were in favour of shopping (84% to 73%) and produce bags (95% to 83%) being certified compostable only.

While most respondents supported the concept of reusable containers, cost of this was a factor affecting their support. Sixty-five per cent of the GISA survey respondents and 29% of the general population sample would be prepared to choose a reusable product for food and beverages, even if the cost were higher. However, 47% of the general population's respondents would choose this if the cost were the same as for single-use items, and only 17% of the GISA respondents agreed.

The community members contributing to this consultation also offered a wide-ranging list of additional areas for the government's focus and these have been collected and summarised in this report.

1.3 GOVERNMENT, NGOs, SHARED INTEREST, WASTE & RESOURCE RECOVERY, AND INDUSTRY STAKEHOLDERS' RESPONSES

Twenty-nine of these stakeholders participated in this consultation via written submissions. They forwarded a wide range of opinions, actions, and suggestions for inclusion by the GISA team. Many of these demonstrated contrary viewpoints, depending upon the sector being represented and the best interests of the submitting organisation.

1.3.1 Should South Australia consider banning or restricting this product group?

GISA received both support for, and objections to, banning or restricting the product group described in the discussion paper.

Reasons for support were:

- financial benefits
- environmental benefits
- social benefits
- opportunities for government-driven public leadership, education, and change
- solving problematic plastics should be a priority.

Reasons for objections, or reservations were:

- creating or exacerbating national/jurisdictional inconsistencies and the costs of this across different sectors
- creating or exacerbating issues for the waste & resource recovery sector
- reliance upon bans when other methods need to be considered/trialled
- concerns relating to the *Single-use and Other Plastic Products Act 2020*
- implementing bans before suitable alternatives are available/proven/specified, and so on.

1.3.2 Are there viable alternatives, and if so, what are they?

Between them, these stakeholders provided an extensive list of 33 single-use plastic (and related) items and a range of suggestions for viable alternatives to them.

In addition, some were strongly in favour of eradicating single-use activities wherever possible and cautioned against the development of replacements over the encouragement of new, alternative behaviours, for example, reusable items, avoidance.

1.3.3 What sort of exemptions, if any, may be needed?

There were mixed responses on the topic of exemptions, with some respondents stating they were not needed unless it was discovered that specific sectors of the community were disadvantaged by the prohibition of single-use plastic items, for example, health, disability, aged care sectors.

At the other end of the spectrum of opinions were those who provided a list of suggested exemptions ranging from compostable items through to plastics which, if banned, would inconvenience customers, and cause financial distress to industry. Another reason for exemptions might be found if it were to be discovered that the alternative (to the single-use plastic) may present an environmental or waste management issue, for example cardboard tags are too small for MRFs, humans may become confused about disposal and inadvertently contaminate waste streams or create litter, and so on.

It was also suggested that exemptions may be for a limited time, to enable an industry response to resolving the single-use plastic problem, for example research and development to develop a viable alternative, implantation of recycling infrastructure, and so on.

1.3.4 What are the health, economical, logistical or social issues that should inform any decisions?

Once again, a wide range of points were submitted in response to this question and those in support of decisions to reduce plastic waste in SA gave the following rationale:

- Cost saving
- Simplifies consumer waste disposal
- Improves waste management and resource recovery
- Increases local employment
- Stimulates entrepreneurialism
- Encourages manufacturers to change their products
- A 3-year+ plan enables longer-term industry and infrastructure planning

Points made in support of delays or against prohibition are summarised as follows:

- More community consultation required to safeguard vulnerable sectors
- More employer/user consultation required to safeguard HSE and costs, profitability, and affordability
- National (and international) alignment required

- Education and behaviour change programs required to support success
- Manufacturers, retailers, wholesalers, importers, and so on, require substantial lead-times for develop, place order, run-down existing inventories and so on, and to avoid financial penalties
- Waste infrastructure requires expansion and development
- More research needed into the end-to-end lifecycle of alternatives to single-use plastics
- Ensure regulatory and standards frameworks are complete before bans
- More research into Extended Producer Responsibility (EPR) solutions
- Review the current *Single-use and Other Plastic Products Act 2020* and make recommendations to future-proof it as novel alternatives, waste management and resource recovery initiatives are developed
- Concerns relating to loss of local employment and business viability

1.3.5 What sort of timeframes should be considered?

As was the case in every section of this consultation, these stakeholders presented a wide range of opinions about timeframes for GISA's consideration. Some sought a 'sooner rather than later' approach while others were recommending a delay for as long as possible for a variety of reasons.

There was little agreement on which items should be prohibited in the 2023 to 2025 (and beyond) timeframes and many reasons were provided for these recommendations.

1.3.6 How long would business, industry and supply chains need to prepare?

These estimates also varied, and the effects on the global supply chain created by the COVID-19 pandemic were frequently mentioned as a reason to extend preparation timelines.

The following factors were mentioned as rationale for short timeframes:

- Industry has already had time to prepare
- The sooner transition to sustainable alternatives to SUPs occurs, the sooner they become the norm

The following factors were mentioned as rationale for extended or delayed timeframes:

- R&D of sustainable (in terms of environmental and financial) alternatives to SUPs is required
- Allow time to educate industry and all user groups on regulations, specifications, procurement, use, disposal, reuse, resource recovery, and so on
- Allow time to develop waste and recovery infrastructure
- Allow time to identify compliant alternatives, place global orders, enable deliveries and stocking, and run-down existing stock
- Sufficient time to innovate novel approaches to resolving problematic plastics

1.3.7 Other items, actions and suggestions from these stakeholders

In addition to the questions posed and information provided in GISA's discussion paper, these industry stakeholders provided many more items, actions, and suggestions for consideration by the GISA team. This included recommendations for:

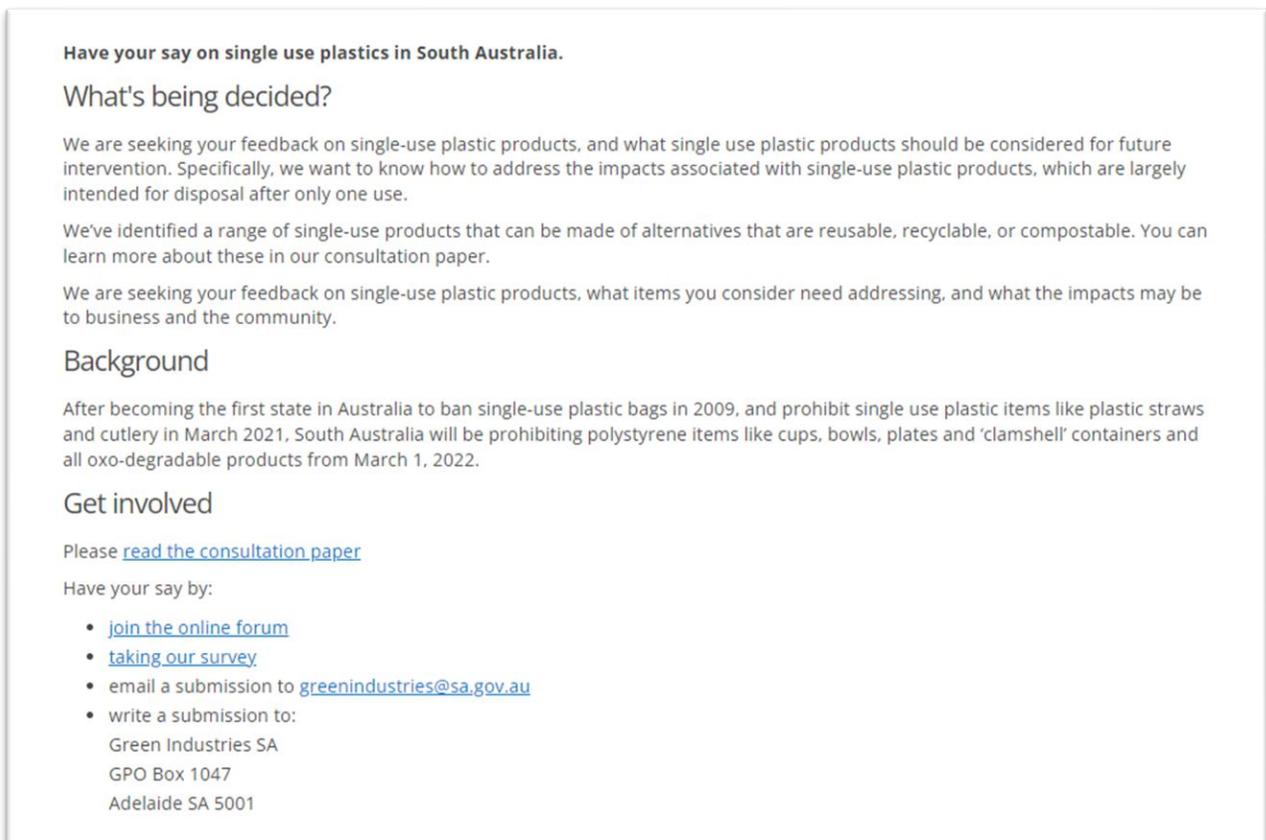
- additional items to be considered for prohibition now or in the future
- extended consultation and community engagement
- implementation of more and wider education campaigns and target groups
- motivating consumers to reuse and BYO
- supporting research and development into alternative and improved solutions to problematic plastics
- standards and enforcement frameworks
- novel ways to replace plastics
- national Product Stewardship schemes
- national harmonisation of approaches to plastic interventions, labelling, verification, compliance, and further research into the activities within other jurisdictions and locales
- supporting innovation
- policy development around the topic of 'avoid' and 'reuse' rather than replacing single-use plastics and other ways to achieve good outcomes, beyond bans
- employing litter measurement survey data to inform policy and actions
- extending SA's Container Deposit Scheme to include problematic plastics and other litter
- discouraging greenwashing through government intervention
- reviewing the *Single-use and Other Plastic Products Act 2020* and its enforcement
- reducing smoking-related litter
- stronger anti-litter enforcement
- increasing the state government's policy focus to support a wider range of activities aimed at achieving a 'plastic-free planet'
- extending definitions, terms and so on, relating to this topic
- recognising the activities and initiatives of those who have voluntarily led single-use plastics and environmental reforms.

2.0 CONSULTATION RESPONSE

2.1 INTRODUCTION

In 2021, Green Industries SA (GISA) prepared *Turning the Tide 2021: The future of single-use plastic in South Australia* discussion paper to prompt and support engagement with stakeholders to consider future stages of single-use plastic product phase-outs and the timing of these.

Between Sunday 5 December 2021 and Saturday 19 February 2022, South Australians were invited to participate in a consultation seeking feedback on the discussion paper *Turning the Tide 2021: The future of single-use plastic in South Australia* and other aspects relating to single-use plastic products, and which should be considered for future intervention.



Have your say on single use plastics in South Australia.

What's being decided?

We are seeking your feedback on single-use plastic products, and what single use plastic products should be considered for future intervention. Specifically, we want to know how to address the impacts associated with single-use plastic products, which are largely intended for disposal after only one use.

We've identified a range of single-use products that can be made of alternatives that are reusable, recyclable, or compostable. You can learn more about these in our consultation paper.

We are seeking your feedback on single-use plastic products, what items you consider need addressing, and what the impacts may be to business and the community.

Background

After becoming the first state in Australia to ban single-use plastic bags in 2009, and prohibit single use plastic items like plastic straws and cutlery in March 2021, South Australia will be prohibiting polystyrene items like cups, bowls, plates and 'clamshell' containers and all oxo-degradable products from March 1, 2022.

Get involved

Please [read the consultation paper](#)

Have your say by:

- [join the online forum](#)
- [taking our survey](#)
- email a submission to greenindustries@sa.gov.au
- write a submission to:
Green Industries SA
GPO Box 1047
Adelaide SA 5001

Figure 1: Snapshot of the invitation to engage and provide feedback from the YourSAy platform

The methods of consultation covered a range of channels to encourage feedback from a range of different individual and the organisational stakeholders in the topic of single-use plastics in South Australia.

2.1.1 THANK YOU

We thank the individuals and organisations who have provided their time and other resourcing to prepare and submit their feedback to GISA. This document summarises the key themes and issues emerging from this wide-ranging consultation. It will help inform the government interventions on single-use plastic products to be developed in 2023 and beyond.

2.2 HOW WE CONSULTED

2.2.1 CONSULTATION CHANNELS

During this consultation, South Australians and those who are stakeholders in this policy development were invited to provide both structured and unstructured feedback on the discussion paper *Turning the Tide: The future of single-use plastic in South Australia* prepared by GISA.

Members of the community, government and industry employed the following channels to share their feedback on the discussion paper and/or, this and other topics generally:

- An online questionnaire, open to all expressing interest in the topic, was accessed via YourSAy, the South Australian Government's digital community engagement site. This attracted 2,735 respondents
- A similar online questionnaire which was sent to 603 South Australians aged 18+ years, drawn at random from a paid and audited panel
- 20 written submissions and opinions received from individuals and other stakeholders, via the YourSAy platform or emails
- 29 written submissions from stakeholders representing:
 - local and state government
 - NGO and Shared Interest Groups
 - waste and resource recovery
 - business and industry.

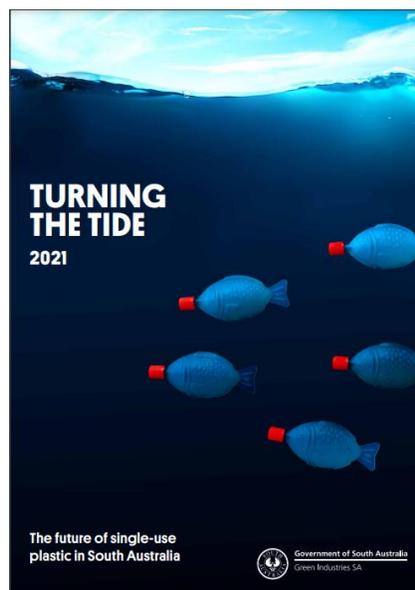


Figure 2: Front cover of discussion paper

The following pages provide descriptions of the aggregated responses received, so that the reader may appreciate the depth and breadth of opinions on this wide-ranging topic.

2.2.2 PARTICIPANTS AND SUBMISSIONS

2.2.2.1 Community responses

We received 3,358 submissions, comments and survey responses from individuals identifying as members of the South Australian public, via the following channels:

- 2,735 GISA survey responses
- 603 panel survey responses
- 20 YourSAy comments and emails.

2.2.2.2 Government, NGOs, Shared Interest, waste and resource recovery, and industry stakeholders

In addition, industry stakeholders submitted feedback via email or posted letters and documents. They represented the following sectors:

STATE AND LOCAL GOVERNMENT SECTOR (8)

Responses were received from the following state and local government stakeholders:

- Adelaide Hills Council
- City of Burnside
- City of Holdfast Bay
- City of Marion
- City of Mitcham
- City of Norwood Payneham & St Peters
- City of Victor Harbor
- Green Adelaide

NON-GOVERNMENT ORGANISATIONS (NGOS) AND SHARED INTEREST GROUPS (6)

Responses were received from the following NGOs and Shared Interest Group stakeholders:

- Boomerang Alliance
- Australian Marine Conservation Society
- Conservation Council SA
- KESAB Environmental Solutions
- No More Butts
- WWF Australia

WASTE AND RESOURCE RECOVERY ORGANISATIONS (2)

Responses were received from the following waste and resource recovery stakeholders:

- East Waste
- Waste Management & Resource Recovery Association Australia (WMRR)

BUSINESS AND INDUSTRY SECTOR (13)

Responses were received from the following business and industry stakeholders:

- Australian Food & Grocery Council
- Australasian Bioplastics Association Incorporated
- Confidential submission 1
- Confidential submission 2
- Confidential submission 3
- Confidential submission 4
- Genfac Plastics
- Huhtamaki
- Little Green Panda Pty Ltd
- National Retail Association
- Phantm (Planet Positive)
- The Hygiene Co
- Trashd Pty Ltd

2.3 WHAT YOU TOLD US

2.3.1 THE COMMUNITY

In late 2021 and the first quarter of 2022, 3,356 members of the public provided feedback on the discussion paper *Turning the Tide: The future of single-use plastic in South Australia*, prepared by GISA, and other topics related to waste management and the environment.

The GISA team sincerely thanks all the people who have taken the time to contribute to this consultation, in any manner, and we have provided a summary of these opinions and suggestions below. Further detail is included in Section 3.1 of this report.

Two surveys administering the same lines of enquiry were conducted, one via the YourSAy engagement platform which was open to any South Australian desiring to provide feedback on the discussion paper and the second drew responses from a paid panel of South Australians aged 18 and over. The purpose of these 2 surveys was to compare the YourSAy responses with those gathered from a representative sample of the general population.

While there were differences in strength of support for further intervention to address the environmental issues caused by single-use plastics, the majority of South Australians (ranging between 97% to 86%) told us they are in favour of this government-led undertaking.

<i>Support for intervention to address SUPs</i>	GISA survey	Gen popn survey
Yes	97%	86%
No	2%	6%
Unsure	1%	8%

Table 1: Do you support intervention to address environmental problems from single-use plastic products, like bags and takeaway coffee cups?

‘The only way to achieve this is through government intervention. I’d be proud to be South Australian again if we led the way in these things.’¹

This support extended to all of the suggested items, with 90% to 94% of the people responding to the GISA survey supporting banning of 13 of the 14 listed items.

<i>Support for prohibition of these products</i>	GISA survey	Gen popn Survey
Plastic confetti	94%	74%
Plastic bags	93%	76%
Single-use plastic beverage cups	93%	72%
Single-use plastic beverage cup lids	93%	71%
Plastic balloon ties & balloon sticks	93%	70%
Single-use plastic bowls & containers	93%	68%
Pizza savers	92%	72%
Plastic soy sauce fish	92%	72%
Polystyrene meat trays	92%	66%
Plastic beverage plugs	92%	65%
Plastic bread tags	91%	72%
Plastic stemmed cotton buds	91%	63%
Plastic fruit stickers	90%	61%
Single-serve pre-packaged products and attached products	81%	56%

Table 2: Select the single-use plastic items you think should be prohibited

While the strength of their support was lower, ranging between 56% to 74% of the respondents to the general population survey supported prohibition of all of these suggested items.

*'I would like to see South Australia supporting all parts of the supply chain to move away from the use of plastics altogether, and as soon as possible ... so yea please, consider prohibiting more single use plastic products.'*²

In addition, many other items were suggested for inclusion, and the majority of these covered the following categories:

- **Food bags:** Described variously as bags for fruit and veg at supermarket/plastic net/fruit and veg protection plastic covers/hard plastic containers for soft fruits, and so on.
- **Non-food packaging:** described as wrappers and cover items, for example cling wrap/cellophane/Glad Wrap/shrink wrap/plastic wrap for non-food items (clothes, books, toilet paper, newspapers)/dry cleaning bags/multi-buy packaging (for example, soaps)/hard plastic wrap around stationery items, batteries, and so on.
- And **packaging in general**, without reference to its specific use.

People were asked about exemptions, and whether any items may require them. Sixty-four percent of those responding to the GISA survey and 44% of the general population respondents did not think that any of the items required an exemption. Twenty-two percent (GISA) and 33% (general population) were unsure and 14% of the GISA respondents and 23% of the general population respondents thought exemptions might be required.

<i>Support exemptions?</i>	GISA survey	Gen Popn Survey
No	64%	44%
Yes	14%	23%
Unsure	22%	33%

Table 3: Do you think that any of these single-use plastics might require an exemption?

More information needs to be provided and reviewed before 22% to 33% of these survey respondents have firm opinions on exemptions, and we were told that they should be considered if the alternatives do not meet the needs of users, for example medical, disability, aged care, food hygiene, safety or fit for purpose, inconvenient.

The majority of these respondents (64% GISA survey and 57% general population survey) prefer either compostable or recyclable alternatives to single-use plastics. The next-most frequently preferred alternative was 'only certified compostable that can go in a green bin' (33% GISA survey, 20% general population survey). While 13% of those responding to the general population survey demonstrated a preference for 'only recyclable alternatives that can go in a yellow bin', just 1% of the GISA survey respondents selected this alternative.

<i>Preferred alternatives</i>	GISA survey	Gen popn Survey
Either compostable or recyclable	64%	57%
Only recyclable that can go in a yellow bin	1%	13%
Only certified compostable that can go in a green bin	33%	20%
Undecided/don't know	2%	10%

Table 4: What alternatives to single-use plastic do you prefer?

It was clear that both those responding to the GISA survey and the general population respondents were in favour of shopping and produce bags being certified compostable only.

Yes to 'Compostable only?'	GISA survey	Gen Popn Survey
Shopping bags	84%	73%
Fruit and veg bags	95%	83%

Table 5: Should all shopping bags be certified compostable only? Should all fruit and veg bags be certified compostable only?

While 68% of the people responding to the GISA survey would be prepared to choose a reusable product for food and beverages (cups and containers) even if the cost were higher than single-use items, only 29% of the general population respondents would choose this. However, 47% of the general population's respondents would choose a reusable container for their food and beverages if the cost were the same as for single-use items, and 17% of the GISA survey respondents agreed.

In contrast, just 12% of the general population and 6% of the GISA survey respondents told us 'No, it's too hard to carry reusable cups and containers everywhere', and only 10% to 12% of all respondents were undecided.

While these respondents were online, they were also asked about their food waste recycling activities. 64% to 66% of them told us that they often, or always, recycled their food waste in their green bins using a compostable bag and kitchen caddy.

Additional areas were suggested for the government's focus, and these have been summarised as:

- more single-use plastic products to be prohibited
- ways to improve consumer awareness, education and activities relating to the reduction of single-use plastics in the environment
- extending opportunities for, and access to, recycling
- increasing the use of compostable content in single-use plastic items
- initiatives, incentives, rewards for consumers, households, and businesses for correct behaviour for avoiding single-use plastics, using, and promoting alternatives to them
- discouraging greenwashing
- disincentivising manufacturers and consumers from using single-use plastic items
- returning to glass bottles for beverages
- providing an avenue to report non-compliance with the SUP legislation
- mandating the use and supply of single-use items at locations, events, and so on
- improving the range and quality of alternatives to single-use plastics.

2.3.2 GOVERNMENT, NGOs, SHARED INTEREST, WASTE & RESOURCE RECOVERY AND INDUSTRY STAKEHOLDERS

Twenty-nine government, NGOs, shared interest, waste and resource and industry stakeholders participated in this consultation via written submissions. They forwarded a wide range of opinions, actions, and suggestions for inclusion by the GISA team. Many of these demonstrated contrary viewpoints, depending upon the sector being represented and the best interests of the submitting organisation.

The GISA team sincerely thanks all of the people and organisations who have taken the time to contribute to this consultation, in any manner, and we have provided a summary of these opinions and suggestions below. Further detail on the submissions by these stakeholders is included in Section 3.2 of this report.

2.3.2.1 Should South Australia consider banning or restricting this product group?

There was broad agreement with the discussion paper's intention, and support for the legislation and fostering behavioural change to reduce single-use plastics throughout South Australia.

A summary of the reasons for this support, offered across the industry stakeholders, is as follows:

- Financial benefits through reduction in waste management and environmental management costs
- Environmental benefits through reduced litter, harm to fauna, marine environments, waste stream contamination
- Social benefits via changing attitudes towards single-use, plastic consumption, reuse, sustainability, public and private waste management
- Opportunities for public and industry education and change management
- South Australian Government has opportunity to take a leadership stance in this initiative
- Solving or preventing the environmental issues created by single-use plastic is a priority

There were also objections to, or reservations about, banning some of the items mentioned in the discussion paper. A summary of the reasons given for these follows:

- Creating or exacerbating national inconsistency, enforcement, and confusion when different states have different banned items and approaches to the reduction of SUPs
- Creating or exacerbating issues for the waste industry
- Reliance upon bans when other methods of SUP reduction could be considered
- Concerns relating to the SUP Act
- Implementing bans prematurely, before suitable alternatives to (some) SUPs are available
- Implementing bans prematurely, before clear product/item specifications are created and communicated to industry and the EPA

2.3.2.2 Are there viable alternatives, and if so, what are they?

The following table summarises all the industry stakeholders' suggestions for viable alternatives targeted single-use plastic items:

Single-use plastic item	Suggested viable alternative
Fruit stickers	<ul style="list-style-type: none"> - Laser technology - Shelf branding, labelling and presentation - Compostable options/certified compostable options - Printing on skin with organic dyes - Alternatives under development (TBA) - In-store signage
Pizza savers	<ul style="list-style-type: none"> - Cardboard - Dough balls - Can be recycled if placed inside larger plastic bottles, along with lids and other small items - Upgrading to stronger boxes
Plastic confetti	<ul style="list-style-type: none"> - Rice, paper, petals, leaves, tissue paper, bubbles
Single-use plastic cups	<ul style="list-style-type: none"> - Certified compostable cups and lids (AS4736-2006 and/or AS5810-2010) (ensure the same for cups and lids) - Certified recyclable cups and lids (PET, PP, PE or rPET) (ensure the same for cups and lids) - BYO/Keep Cups/reusable/returnable mugs - Swap-and-Go exchange system at point of purchase/mug libraries - Not to include recyclable cups/lids - Locally available fibrous residue - Paperboard cups with aqueous coating
Single-use plastic beverage lids	<ul style="list-style-type: none"> - Cardboard (like straws) for cold (and possibly hot) beverages - Certified compostable cups and lids (AS4736-2006 and/or AS5810-2010) (ensure the same for cups and lids) - Certified recyclable cups and lids (PET, PP, PE or rPET) (ensure the same for cups and lids) - Clear PET or PLA for cold beverages (aligned with APCO product labelling to prevent consumer disposal errors)
Single-use plastic food containers, bowls and plates/takeaway food containers	<ul style="list-style-type: none"> - Items readily recyclable according to PREP and the ARL or certified compostable to EN 13432, AS 4736, AS 5810 or ASTM D6400 - Bagasse containers - Reusable/refillable containers - Non-plastic containers - Locally available fibrous residue - Polypropylene (PP)
Polymer/plastic-lined paper plates and bowls	<ul style="list-style-type: none"> - Currently no viable alternative to meet stringent food safety requirements - Development of alternatives is underway (24 to 36 months) - Locally available fibrous residue - PHA
Lids for food containers, bowls and plates	<ul style="list-style-type: none"> - PP or rPET/PET lids for recycled paperboard containers - Recyclable paper lids - Compostable bagasse lid - Locally available fibrous residue
Plastic-stemmed cotton buds	<ul style="list-style-type: none"> - Cardboard/paper fibre buds - Bamboo buds (although received non-recommendation due to the time they take to compost) - Wooden or non-plastic buds - Avoidance

Single-use plastic item	Suggested viable alternative
	- Reusable sticks with replaceable heads
Plastic beverage plugs	- Compostable inbuilt stoppers (in lids) - Paper, wood, bamboo alternative
Plastic bread tags	- Cardboard tags
Plastic bags/checkout bags/tick plastic bags	- Paper, cardboard, woven bags, and boxes - Compostable bags - BYO - Many alternatives - High recycled content bags, for example 70% to 80% - Bag for Good, non-woven polypropylene - Paper bags, 70% recycled content, FSC-certified paper - Paper self-opening satchel (SOS) - Flat paper bags - Paper checkout bags - Polyester foldable/purse bags - Transparent paper materials - Any paper with a high recycled content
Plastic barrier bags	- Certified compostable bags (also used in kitchen caddies) - Many alternatives - Transparent paper materials - Flat paper bags (for example, mushroom bags)
Kitchen caddy liners	- Paper flat bags
Plastic soy fish/sauce sachets	- Requesting for it to be added at point of purchase - Self-serve sauces at point of purchase, from refillable containers
Plastic ties with a metal strip	- 100% recycled cardboard tags
EPS food containers and trays used for meat, fruit & other items for retail sale	- Materials which are recyclable through kerbside co-mingled recycling or certified compostables - Plant-starch-corn based products - Recyclable rigid PET options/PET trays - Not recommended are black plastic trays (create issues in MRFs) or trays with plastic film still attached - Cardboard - Locally available fibrous residue
Takeaway plastic-lined cardboard food containers	- Cardboard - Certified compostable alternatives - BYO - Swap-and-Go exchange
Takeaway plastic windowed cardboard food containers	- Cardboard - Certified compostable alternatives - BYO - Swap-and-Go exchange
Single-use items to be replaced with compostable, at every opportunity	- Compostable containers, cups, and lids (certified compostable to AS4736-2006, AS5810-2010)
Post-purchase packaging	- Plant-starch-corn fillers
Food industry EPS cool boxes	- Plant-based or cardboard-based/waxed products
Plastic confectionary sticks	- Wood or cardboard alternatives
Pre-packaged food wraps (for example, ice	- Current and improved paper packaging

Single-use plastic item	Suggested viable alternative
creams, chocolates, chips)	
Plastic box strapping	- Non-PET, 100% biodegradable product
Plastic balloon sticks, ties and accessories	- Cardboard - Bamboo - Wooden or non-plastic alternatives - Avoidance - This will depend upon the final definition of 'ties' - Suppliers to be engaged for alternatives under development - Fibre-based balloon sticks
Plastic wrapping on magazines	- Home compostable wrapping
Plastic corflute tree guards	- Fully compostable corflute
Plastic cigarette filters	- Filter-less cigarettes - Biodegradable filters - Reusable filters - e-cigarettes
Single-use plastic plates and bowls	- Certified compostable alternatives
Balloons	- No identified alternative
Single-use plastic wipes (wet wipes)	- Certified compostable wipes - Reusable wipes
Polymer(s)/organic polymers	- Uncertainty around this topic was mentioned frequently - PHA from organic waste

Table 6: Summary of all suggested viable alternatives

Some of these stakeholders were strongly in favour of eradicating single-use activities wherever possible and cautioned against the development and use of SUP replacements over the encouragement of alternative behaviour, for example, reusable items, avoidance and so on.

2.3.2.3 What sort of exemptions, if any, may be needed?

There were mixed responses on the topic of exemptions, with some respondents stating there was no need for any exemptions unless it was discovered that specific sectors of the community were disadvantaged by the prohibition of one or more of the single-use plastic items, for example, disability, health and aged care sectors.

Others mentioned a need for (or the investigation of) exemptions for:

- 100% compostable single-use cups and lids (if banning single-use beverage cups and lids)
- 100% recyclable single-use cups and lids (if banning single-use beverage cups and lids)
- food takeaway businesses where bags might be required
- items, areas, or sectors where a suitable alternative has not yet been identified or made available
- items for which the replacement may create novel issues for the waste industry, for example, cardboard bread tags being too small to be picked up by MRFs, items which are difficult to identify as being waste contaminants and items which may create more waste
- items employed for medical purposes, and in collaboration with other jurisdictions to ensure uniformity of labelling, disposal pathways and ecosystem protection
- polymer-coated paper plates and bowls

- recyclable items
- plastic plates, bowls, lids and containers if they are recyclable, recoverable or compostable
- plates, bowls and lids if they are demonstrably designed for reuse and made from recycled materials
- transparent cups and lids
- plastic ribbons
- plastic fruit stickers
- plastic tags on produce
- plastic stemmed cotton buds
- polymers
- any/all products that will compost in natural conditions
- items which demonstrate better environmental performance than other alternatives
- items/products offering traceability to prevent cross contamination, to improve sustainability
- items that will prove resilience in the face of global disruptions
- seasonal tableware (for example, Christmas plates)
- pre-packaged and attached products such as cutlery and straws – limited exemption suggested until alternatives/solutions are developed.

However, exemptions need to be weighed against the flow-on effects of the items entering the waste stream and contaminating household waste and so on, thus creating further difficulties and issues. One of these items attracting frequent mention was recyclable beverage cups which are processed only by recycling systems which may not be available to the householder/kerbside collection and may create confusion and increase kerbside and public waste contamination.

2.3.2.4 What are the health, economical, logistical or social issues that should inform any decisions?

There were many points addressed by the stakeholders in support of interventions to reduce plastic waste in SA, which have been summarised by the following:

- Saves waste cost to councils
- Simplifies consumer waste disposal
- Improves waste management and resource recovery
- Increases local employment
- Stimulates entrepreneurialism, for example through the development of alternatives to SUPs
- Sends a clear message to those who manufacture/sell items which are harmful to the environment and encourages them to start replacing these now
- Stimulates circular economy infrastructure investment and development
- A 3+ year approach enables longer-term planning for industry

There were also points made against prohibition of some of the SUPs, or in support of delaying intervention and the implementation of prohibitions, or requesting further consideration before decision making is undertaken. These have been summarised as follows:

- Working nationally (and internationally) to provide an aligned and coordinated approach to SUP reduction (for example, APCO National Packaging Targets, National Shopping Bag Pact, EU SUP Directive, EMM Strategy)
- Ensure all community sectors have been consulted to safeguard against disadvantage or inequity, for example aged and disability care, HSE standards and result areas

- Educate consumers, enable knowledge, and lead behavioural change
- Educate manufacturers, enable lead-time to transform items and ensure sustainability
- Educate retailers, enable lead-time to transform and ensure sustainability
- Educate consumers on items and their correct disposal
- Increased costs of infrastructure development, for example putrescible waste, recycling loops
- Examining the ongoing, longer-term effects of banning an item to ensure that these do not create a similar or worse problem, for example increase in sales/use of plastic bags, confusion at kerbside collection, environmental impacts of littered compostables, effect on reduction of greenhouse gas emissions
- Ensuring that regulatory frameworks are developed and Australian Standards are met at every stage of a product's life cycle
- Provision of adequate waste management and resource recovery infrastructure
- Exploration and/or establishment of mandatory Extended Producer Responsibility (EPR) programs
- Some items are designed to improve user safety, and these should not be removed without regard to future safeguarding, for example polymer-coated paper plates
- Maintaining flexibility within the SUP Act to accommodate innovation, supply shortages, global and local opportunities, and challenges
- Determining and reducing the effect on retail pricing and the costs of providers
- Review of the end-to-end effects of removing the proposed items from circulation
- Review of employment effects and opportunities, created by the proposed interventions, leading to remediation and workforce planning
- Development of industry protections to ensure all industry sectors are not worse-off following interventions, that is, safeguard those who will be financially penalised by the bans.

2.3.2.5 What sort of timeframes should be considered?

There were wide-ranging opinions of the timeframes required to enact changes to South Australia's use of single-use plastics, with some respondents calling for immediate implementation of all suggested bans (and more) and others, at the opposite end of the spectrum, seeking post-March 2025 lead times. These varied responses have been summarised below.

The respondents mentioned the following items to be banned in Stage 3, no later than **March 2023**:

- Fruit and vegetable produce bags in self-serve locations, for example fruit and veg departments
- Plastic barrier bags behind counters, for example at deli and meat retailers
- Plastic bags currently used in the purchase of all foods, for example meat, deli, bulk food (phased option proposed)
- All 'highly problematic' bags
- Plastic balloon sticks, ties, holders, accessories
- Plastic-stemmed cotton buds
- Plastic confetti
- Plastic pizza savers
- SUP coffee cups and lids (including 100% recyclable), single-use plastic cups/single-use plastic lids
- SUP plates
- SUP bowls
- SUP food containers

- Thick plastic bags/shopping bags
- Plastic barrier bags
- Plastic fruit stickers
- Other EPS consumer food and beverage containers
- EPS trays/packaging used for meat, fruit, and other food items for retail sale
- Black plastic recyclable rigid PET trays
- Trays that can't be cleaned or prepared for recycling, for example meat juices, attached cling film
- Pre-packaged products and attached/integrated items
- SUP takeaway food containers
- Plastic-lined takeaway cardboard food containers
- Plastic-windowed takeaway cardboard food containers
- Plastic microbeads
- Plastic sauce and condiment sachets (including soy sauce fish)
- Plastic beverage plugs
- Plastic bread tags
- Plastic party supplies
- Ice bags
- Bait bags
- Nonbiodegradable dog waste bags
- All oxo-degradable plastics
- Plastic cigarette/roll your own filters
- A legislated ban on helium balloon releases
- EPR legislation on cigarette butts
- Improved disposal options for single-use masks

Summary of mentions of products to be banned in Stage 4, no later than **March 2024**:

- Other polystyrene food products
- Polystyrene meat trays
- Thicker style plastic carry bags (refer National Shopping Bag Pact)
- Single-use plastic produce bags
- Single-use plastic cups, unless compostable or recyclable via widely available services
- Single-use plastic lids (for beverage cups), unless compostable or 100% recyclable via widely available services
- Single-use plastic food containers, bowls, and plates (noting that polymer-coated items may require more time)
- Statewide phase-out of plastic bags currently used in the purchase of all foods, for example, meat, deli and bulk food
- Plastic beverage plugs
- Plastic-stemmed cotton buds (and alternatives that are not suitable/certified for commercial composting)
- Plastic bread tags
- Plastic ties with a metal strip
- Plastic balloon sticks, ties, and accessories
- Plastic fruit stickers
- Plastic confetti
- Plastic pizza savers
- Plastic soy sauce fish
- Plastic beverage plugs
- EPS trays and containers

- Pre-packaged products and attached/integrated items
- Balloon releases
- Restricting soy sauce fish to facilitate vendor and consumer education and generate viable alternatives (as precursor to Stage 5 ban)
- EPS gelato containers.

Summary of mentions of products to be banned in Stage 5, no later than **March 2025**:

- Pre-packaged products and attached/integrated items (or ending the exemption if solutions/alternatives re-developed)
- Plastic fruit/vegetable stickers (if alternatives are available)
- Plastic confetti
- Plastic bread tags
- Plastic pizza savers
- Balloons
- EPS trays for meat, fruit, and other items
- EPS food and beverage containers
- Plastic beverage plugs
- Plastic bread tags
- Plastic soy sauce fish
- Plastic sauce sachets
- 'Other' EPS consumer food and beverage containers

Some of the respondents suggested the following items/categories would require further investigation before intervention timeframes are specified and finalised, because they are problematic in many ways (for example cheaper than alternatives, current alternatives are unsuitable, alternatives still under development, and so on):

- Plastic soy sauce fish
- Plastic beverage plugs
- Plastic confetti
- Plastic pizza savers
- Pre-packaged and attached plastic items
- Plastic balloon ties
- Fruit and vegetable stickers
- Plastic wipes (wet wipes).

2.3.2.6 How long would business, industry and supply chains need to prepare?

Once again, the consultation received a wide range of submissions relating to the time that businesses and supply chains would need to prepare for bans. Their estimates, it was frequently pointed out, has also been (and is continuing to be) impacted by the COVID-19 pandemic, which has created insecure and uncertain global supply chains and it was requested that consideration is given to this complication to business as usual.

Different respondents proposed different timelines, recommending the following factors and timelines be considered:

- **Summary of rationale for short timeframes:**

- Taking into account the time which has already elapsed since the passing of the legislation and the many ways in which these bans/proposed bans have been communicated, reasoning that little or no more time is (or should be) required
- As soon as practicable if the transition (to sustainable alternatives) has already begun, enabling compostable alternatives to become the norm more rapidly
- **Summary of rationale for extended or delayed timeframes:**
 - Sufficient time to research and provide suitable alternatives so consumers and businesses are not impacted
 - Sufficient time to enable the research and development of sustainable alternatives and investigate alternatives
 - Sufficient to allow for effective industry and community education around the right ways to recycle/reuse/dispose, and so on.
 - Ensure industry has time to place orders (12 to 24 months lead time), arrange marketing and deal with global supply chain issues
 - Ensure manufacturers have sufficient time to produce alternatives and supply them
 - Ensure industry has sufficient time to run down/draw down existing inventory of to-be-banned items and avoid financial hardship
 - Sufficient time to ensure success of the bans and other activities
 - Sufficient time to establish appropriate circular economy solutions for resource recovery, reuse infrastructure etc.
 - 12-month transition period
 - Sufficient time to test and prove the efficacy/safety of the newer alternatives

There was a request that the proposed timeframes are delayed from 1 March annually to 1 September to allow for additional preparation lead time and to avoid peak retail periods.

2.3.2.7 Other items, actions, and suggestions from the industry stakeholders

In addition to the questions posed and information provided by the discussion paper, these industry stakeholders provided many additional items, actions, and suggestions for consideration by the GISA team. These have been summarised below:

- Additional items suggested by these industry stakeholders for including in future bans and/or for further consideration for prohibition:
 - Excessive fruit and vegetable plastic packaging and wrapping
 - Expanded polystyrene food trays and packaging
 - Expanded polystyrene beads (used for bean bags)
 - Mandatory for cups and lids to be compatible, that is both compostable or both recyclable
 - Plastic beverage cup lids, plastic dome lids
 - Plastic/foil sauce sachets
 - Plastic 'grass' separating/decorating takeaway sushi
 - Plastic ties with a metal strip
 - Takeaway plastic-lined cardboard food containers
 - Takeaway plastic windowed cardboard food containers
 - Balloons
 - Fireworks
 - Loose fill consumer packaging (to fill packing voids)

- Moulded consumer packaging (to fill packing voids)
 - EPS cool boxes for food industry use
 - Fishing bait bags
 - Non-biodegradable zip lock bags
 - Convenience food packaging, for example, ice-creams, chocolates and chips
 - Plastic box strapping (blue, yellow, white, black)
 - Plastic bottle tops and caps
 - Nylon rope
 - All expanded polystyrene (EPS)/polystyrene packaging
 - Helium balloon releases (all balloon releases)
 - Black plastics/black plastic recyclable rigid PET trays
 - Soy sauce fish
 - Plastic beverage plugs
 - Plastic bread tags
 - Plastic cigarette butts/filters
 - Plastic microbeads
 - Plastic wrapping on magazines
 - Plastic corflute tree guards
 - A greater range of plastic party items (than proposed)
 - Snack bags/confectionery wrappers
 - Bottle tops
 - Lollipop sticks
 - Plastic confetti
 - Plastic pizza savers
 - All 'problematic' single-use plastics from retail sources
 - Transport packaging, for example, EPS, plastic wrapping
 - All plastic packaging (soft and hard)
 - Paper and plastic wipes/wet wipes containing microplastics
 - Plastic films/wrapping unless employed to prolong shelf life or food safety
 - Plastic food decoration
 - All plastic bags (particularly those given to customers for free)
 - Paper/calico bags promoting single-use
 - Plastic giveaway toys
 - Product ties
 - Neck rings
 - 'Unnecessary double (plastic) wrapping'
 - Bait bags
 - Ice bags
 - Dog waste bags
 - Cigarette packets
 - Additive fragmentable technologies
- Conducting further consultation with specific consumer sectors, such as disability, health, aged care, CALD, SMEs (see next point below)
 - Implementing mainstream education campaigns to create and support awareness of and behavioural changes among consumers and specific groups of creators of plastic waste such as fisherfolk, medical users, retailers, culturally and linguistically diverse (CALD) communities, charities and not for profits, others who are/may be unaware that the proposed bans apply to them, businesses concerned about/unable to afford the increased costs of intervention
 - Motivating consumers to BYO bags and containers

- Supporting research and development into alternatives and improved solutions, such as inbuilt beverage stoppers, PET bottle lid recycling, R&D Grants
- Paying attention to standards and their definitions, usage, mandates, and enforcement, for example, AS4736-2006 for compostables
- Identifying more ways to replace plastics with compostables
- Identifying opportunities for, and supporting the development of national product stewardship schemes
- Improving the ways in which single-use face masks are disposed of (and recovered)
- Work nationally (and internationally) to provide progressive and consistent approaches to addressing problem plastics (and other items harmful to the environment) and collaborating with other Australian jurisdictions to harmonise definitions, activities, and bans, for example, WA's approach to plastic-lined cups, EMM strategy, National Shopping Bag Pact, APCO Packaging Targets
- Reviewing the activities occurring in other towns, states, or jurisdictions to learn from them and improve SA's outcomes, for example, Hobart's ban on soy sauce fish, microbead inquiries, Queensland's consideration of plastic wrapping of magazines, loose-fill EPS packaging, and so on.v
- Increasing the volume and reach of state government communications and support to enhance community understanding, encourage behaviour change, drive adoption of reusables and support innovation
- Developing policy and increasing the education and promotion of 'avoid' plastics and reducing single-use behaviour and other ways (beyond bans) to achieve good outcomes
- Employing litter measurement surveys to inform future government policy, targeting and outcomes
- Extending SA's Container Deposit Legislation to tackle plastics and other litter
- Focus on the growing problem of medical waste, created since the COVID-19 pandemic
- Focus on reducing the volume and environmental impact of smoking-related litter
- Investing in circular economy infrastructure, particularly if the forecast increase in reuse, recovery, and composting activities as a result of these proposed bans occurs, such as funding closed-loop recycling, R&I Grants, retail collaboration, increasing domestic recycling content
- Investing in public waste disposal facilities and collections, for example green/FOGO bins, recycling bins
- Focus on ways of discouraging greenwashing by educating consumers, establishing clear manufacturing, and developing (national) standards for the use, content and labelling of reusable, compostable or recyclable items
- Increasing anti-litter enforcement
- Extending the SA Government's policy focus to support and extend the goal to reach a 'plastic-free planet,' for example innovation, plastic feedstock management, regulation, investment, standards and certifications, intervening in both demand and supply, import controls
- Review and confirm/alter the scope, descriptions, parameters, and terms employed to provide clarification on the topic of Single-Use Plastics and interventions to reduce them. This may include a review of the SUP Act
- The state government was requested to provide additional, clear information on a range of topics relating to SUPs, waste management and sustainability interventions
- Reviewing and extending the enforcement of the SUP Act and the activities designed to reduce SUPs in SA
- Providing recognition for the organisations and individuals who have led SUP and environmental reform

- Supporting strategies and tactics to achieve national verification and labelling compliance
- Investigation of other uses of SUP waste, now and in the future

3.0 DETAILED FEEDBACK

3.1 THE SOUTH AUSTRALIAN COMMUNITY

3.1.1 SOURCES OF FEEDBACK FROM THE SOUTH AUSTRALIAN COMMUNITY

During this consultation, South Australians and those who are stakeholders in this policy development were invited to provide both structured and unstructured feedback on the discussion paper *Turning the Tide: The future of single-use plastic in South Australia*.

Members of the community employed the following channels to share their feedback on the discussion paper and/or the topic of problematic plastic products generally:

- An online questionnaire, open to all expressing interest in the topic, was accessed via YourSAy, the South Australian Government's digital community engagement site. This attracted 2,735 respondents
- A similar online questionnaire which was sent to 603 South Australians aged 18+ years, drawn at random from a paid and audited panel
- 20 written submissions received from individuals and other stakeholders, via the YourSAy platform.

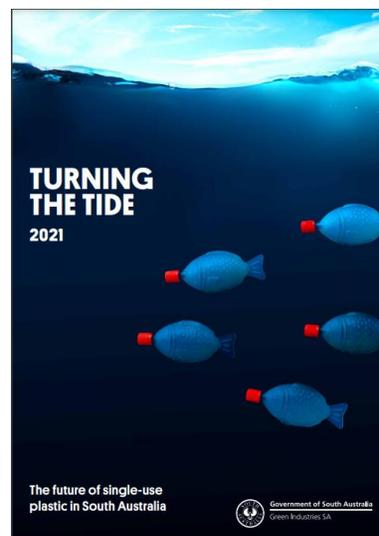


Figure 3: Front cover of discussion paper

3.1.2 THE ONLINE PUBLIC SURVEY VIA 'YourSAy' PLATFORM AND SURVEY MONKEY, COMPARED WITH THE ONLINE PANEL SURVEY

All members of South Australia's community were invited to participate in an online survey, which ran from Sunday 5 December 2021 to Saturday 19 February 2022. Respondents voluntarily accessed the Survey Monkey survey via the YourSAy consultation platform.

The questionnaire (refer Appendix A), prepared by the Green Industries SA team, covered the following areas of enquiry:

- Respondent details (mandatory): name, contact, age and gender (these remain confidential)
- Before today, were you aware that polystyrene and oxo-degradable plastic will be prohibited in SA from March 1, 2022?
- Do you support intervention to address environmental problems from single-use plastic products like bags and takeaway coffee cups?
Should any of the single-use items (pictured) be prohibited, or replaced, with recyclable or compostable or reusable alternatives?

- Are there any other items you think should be prohibited?
- Do you think any of these single-use items might require an exemption?
- What alternatives to single-use plastic do you prefer?
- Should all shopping bags be certified compostable only?
- Should all fruit and vegetable bags be certified compostable only?
- Do you recycle your food waste in your green bin using a compostable bag and kitchen 'caddy'?
- Would you be prepared to choose a reusable product for food and beverages (cups and containers)?
- Do you have any further comments on the future of single-use plastic items in South Australia?

At closing, 2,735 individuals had provided valid responses to this survey.

In addition to the GISA survey accessed via the YourSAy platform (described above), another online survey employing the same, or similar, questions was commissioned to provide comparable data.

This additional consultation was considered necessary to gain a broader view of South Australians' opinions and feedback to compare with those delivered via the YourSAy platform. This is because it could be argued that the YourSAy platform attracted more opinions from people with a more developed interest in this topic than the 'average' member of the SA public. This second survey gathered opinions and feedback from 603 members of the SA public who were recruited via an accredited, paid panel of the state's population aged 18+ years.

A summary of the side-by-side results of the two surveys follows. The initial survey of 2,735 respondents, hosted on the YourSAy site is identified by the label **GISA** while the panel survey of 603 respondents drawn from the general population and used for comparison purposes, is labelled **Gen Popn.**

3.1.2.1 Supporting the intervention to address environmental problems from single-use plastics

Respondents were asked the following question:

Do you support intervention to address environmental problems from single-use plastic products, like bags and takeaway coffee cups?

Strong support for intervention is visible within both surveys, with almost unanimous support (97%) from the GISA survey respondents and strong support from the general population (Gen Popn.) respondents (86%).

'I think that it is a good thing. Hopefully other states will follow the lead of South Australia'³

'We must do everything we can to make more products that will be recyclable.'⁴

'Way overdue. Too much plastic in the world, especially in the oceans.' (GISA survey)⁵

*'If we can use an alternative to any form of plastic for single use products than it is imperative we do so. The environment to me is the most important issue...'*⁶

Do you support intervention to address environmental problems from single-use plastic products like bags and takeaway coffee cups?

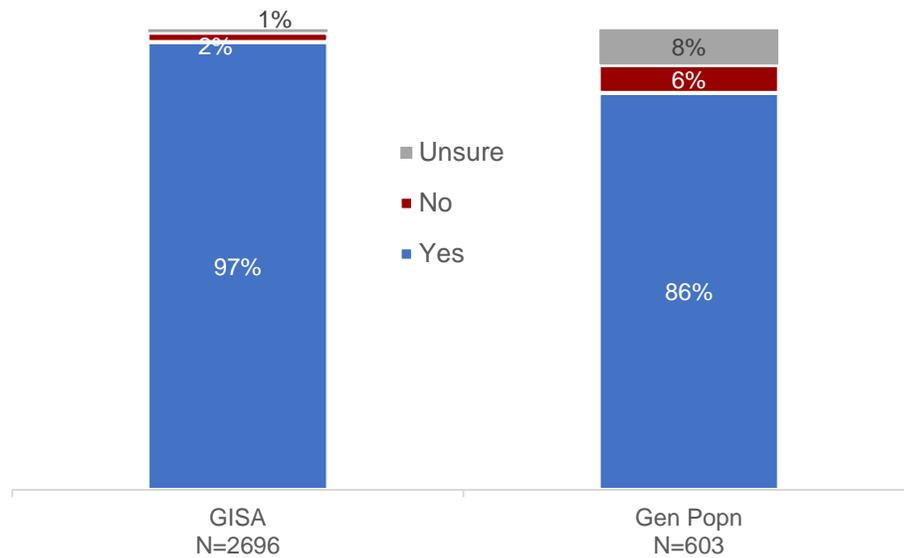


Figure 4: Do you support intervention to address environmental problems from single-use plastic products, like bags and takeaway coffee cups?

Those in the minority who expressed concerns or reservations about government intervention into single-use plastics gave reasons which have been summarised below:

- Because alternatives may simply create another type of undesirable waste
- Because alternatives may be more expensive
- Because the intervention should be more broadly focused, for example face mask waste, balloons, air pollution
- Fears that people or products will be disadvantaged as a result of the intervention.

3.1.2.2 Single-use plastic products that should be considered for future bans

Respondents were asked the following question:

Select the single-use plastic items you think should be prohibited: and were shown (online) pictures and text descriptions of list of proposed items.

Results of both surveys indicated a high level of support for the prohibition of the listed items:

- Significantly higher scores were received from the people actively interested in the consultation by responding to the GISA Survey, with 90% to 94% supporting banning 13 of the 14 listed items
- The general population panel members supported each item to be banned to a lower extent, ranging between 56% to 76% which is sufficient to conclude that the majority of South Australians favour prohibition of these items
- The item attracting the least support for future bans was the same in both groups: *Single-serve pre-packaged products and attached items made from plastic*, and while these scores were lower, the majority of both groups recommended their prohibition.

In addition, respondents were invited to suggest additional items for this list, when they were asked:

Are there any other items you think should be prohibited?

45% of respondents to the GISA survey and 33% of the Gen Popn Survey respondents suggested additional items for prohibition. Their responses showed similar opinions of which categories of items recommended for prohibition and their relative importance, with the majority falling into these categories:

- **Food bags:** Described variously as bags for fruit and veg at supermarket/plastic net/fruit and veg protection plastic covers/hard plastic containers for soft fruits, and so on.
- **Non-food packaging:** described as wrappers and covers items, such as cling wrap/cellophane/Glad Wrap/shrink wrap/plastic wrap for non-food items (clothes, books, toilet paper, newspapers...)/dry cleaning bags/multi-buy packaging (for example, soaps)/hard plastic wrap around stationery items, batteries, and so on.
- And **packaging in general**, without reference to its specific use.

There were some differences in items mentioned by the 2 different survey respondents, with a greater range and quantity being named by the GISA survey participants (such as balloons), and this could be because of their (presumed) greater engagement with the topic.

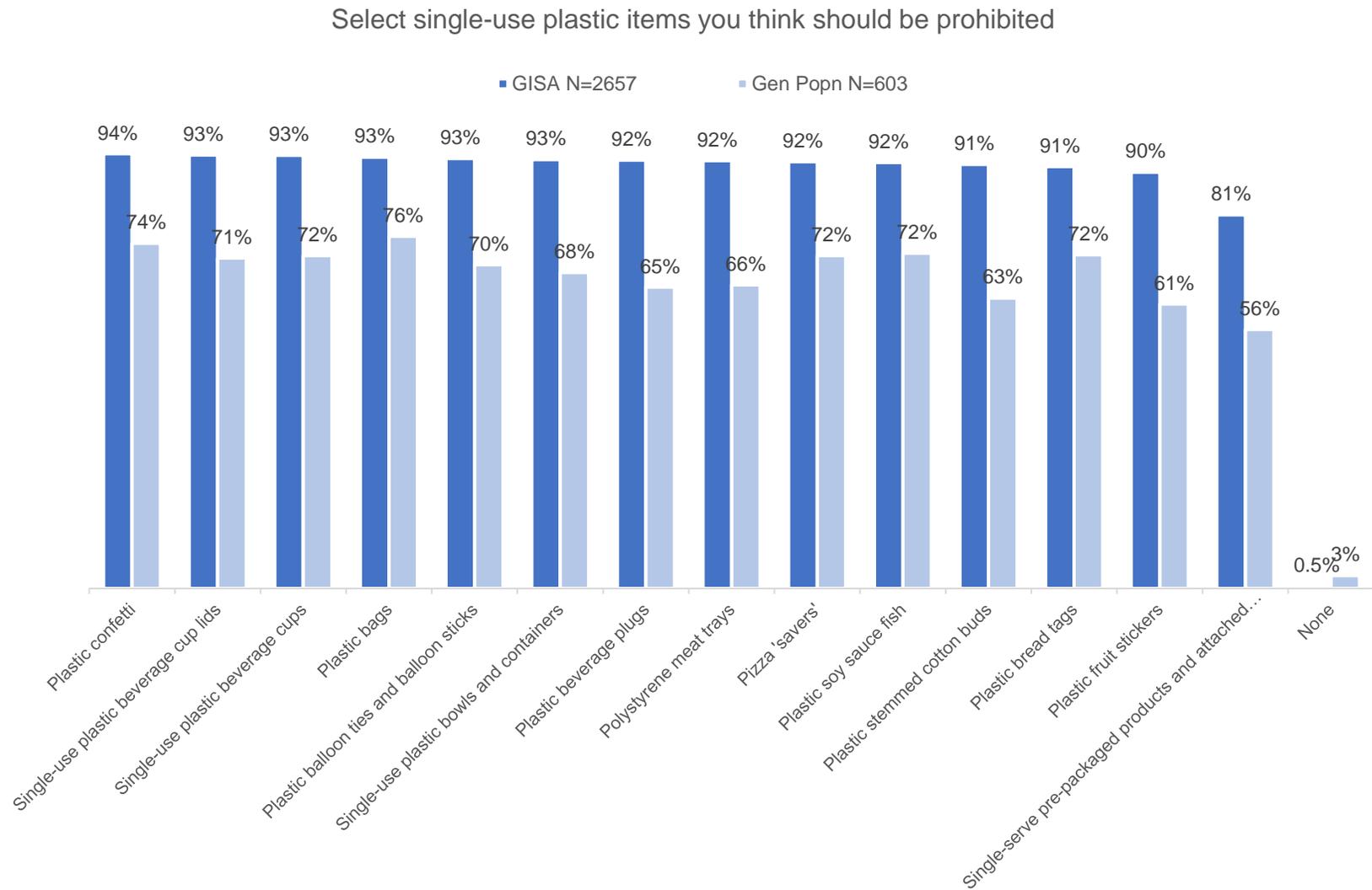


Figure 5: Select the single-use plastic items you think should be prohibited

• **Summary of the GISA survey respondents' suggestions**

The 1,244 respondents (45% of all respondents) who answered this question in the GISA survey gave a broad list of suggestions, as shown below. Quite often, they told us that they based their suggestions on the items most often found in their cleaning/litter collection campaigns or were known to injure animal life when littered.

<i>Multiple responses</i>	Made suggestions N=1244	
Any packaging mentions (NET)	52%	646
Bags for fruit and veg at supermarket/plastic net/fruit and veg protection plastic covers/hard plastic containers for soft fruits	28%	349
Cling wrap/glad wrap/shrink wrap/cellophane/plastic wrap for non-food items (such as clothes, books, toilet paper, newspapers)/dry cleaning bags/multi buy packaging (such as soaps)/hard plastic wrap around stationery items, batteries	11%	137
Excessive packaging/wrap packaging and protections used for transportation or securing merchandise (such as bubble wrap, dry cleaning, beads, pillows, cushions, sleeves)	6%	76
All plastic bags (including reusable ones): for example, dog poo bags, bin bags and liners, sandwich bags, zip lock bags, freezer bags	6%	74
Plastic food packaging: for example, for pantry items (sugar, pasta, rice, and so on), chocolate, lollipops, chips/individual serves/biscuit trays	5%	63
Polystyrene wrapping and packaging, used for electronics, microwaves, fridge	5%	59
Deli/bakery/butcher bags and plastic wrap/plastic covered papers and boxes	4%	47
Plastic/polystyrene trays (not only for meat), fruits, baked goods, deli...	4%	44
ALL plastic packaging/multi layered packing/unnecessary packaging	3%	39
Clothes packaging/hangers and holders/plastic pins/cable ties, for example socks, ties.../plastic (covered) price tags	3%	38
4 to 6 pack beverage rings/holders	2%	19
Food and beverage-related (NET)	25%	313
Plastic/polystyrene take-away containers/sushi containers/ready-meals packaging/clamshell containers	9%	106
Plastic water bottles/soft drink bottles/milk (including cartons)	5%	59
Plastic bottle lids/caps/plastic lids on jars	5%	57
SU cutlery/plates/cups/ice-cream spoons/stirrers (including the ones attached to in shop bought ready meals, salads)	3%	40
Sauce containers/bottles (regular or small sized in restaurants)/sauce packets/squeeze on single sauces/SU pre-packaged butter	3%	38
Plastic straws (in fruit box drinks)	2%	24
Plastic coffee pods/tea bags	1%	17
Plastic seals around lids	1%	8
Cosmetics and Personal care/House cleaning (NET)	9%	107
Microbeads	5%	59
SUP dental: Plastic floss/plastic toothbrushes/plastic toothpicks	2%	27
Nappies/Wet wipes/Wipes	1%	15
Laundry liquid/shampoo bottles/cleaning products and bottles/plastic toothpaste tubes	1%	14

Multiple responses	Made suggestions N=1244	
Other items		
Balloons (including explicit ban on helium balloons release)	16%	199
Cigarette butts/filters/plastic cigarette filters	7%	88
Glitter	3%	43
SU plastic TOYS in supermarkets/tied to products	3%	39
SU Face Masks (outside the medical facilities)	3%	35
Lollipop sticks	3%	33
Zip ties/Cable ties/Twist ties	2%	28
Lighters	1%	12
Fishing gear: line, nets, tackle	1%	12
Rapid Antigen Tests	1%	9
Range of plastics without clear recycling codes/all non-recyclable plastic (for example mix of materials like envelopes, bread bags), soft plastics (including biodegradable plastic)	5%	58
All (single-use) plastic/All plastic that has a recyclable, compostable alternative/Any plastic that can be replaced	7%	92
Others (mentioned with low frequency)	11%	132

Table 7: Are there any other items you think should be prohibited? Summary of the GISA survey respondents' suggestions

Produce packaging at point of sale was the most common theme within the packaging complaints (52%), with 28% suggesting the prohibition of single-use fruit and veg bags at supermarkets and net fruit bags, plastic produce wrapping (such as the plastic wrap used on cucumber) or hard plastic containers for soft fruits and their wrappers.

*'It's so sad to only have berries/cherry tomatoes etc. available in plastic.'*⁷

*'... net fruit bags if made of plastic'*⁸

*'The plastic wrap on cucumber'*⁹

Banning soft wraps like cling wrap, plastic covers for non-food products, for multi-pack items (such as soap multipacks) and hard covers for stationery items and batteries was mentioned by 11%. In addition, plastic food packaging like plastic bags for pantry items (sometimes enclosed inside a box), chocolate, ice-cream, lollipops, or biscuit trays were mentioned by 5%.

*'... multiple layers of packaging- e.g., cereal in a bag then in a box'*¹⁰

People were also critical of excessive non-food packaging, and 6% mentioned the protective plastic and inserts used for transportation (such as zip ties and hangers), bubble wrap, sleeves, pillows, beads) and the polystyrene used for packaging electronics (5%). And 3% suggested ALL plastic packaging (because it was considered often multilayered and unnecessary) should be banned.

'Plastic bags used within packaged items such as computer peripherals etc. - if you open a box containing a sound-bar for the TV as an example, not only is

*there polystyrene foam holding the item itself, but usually at least 3 or 4 polyethylene bags, each containing a power cord, a connection cord, a remote-control unit and often the product manual is in one as well - manufacturers should be able to better design the packaging to avoid so many individual plastic items in one carton.'*¹¹

6% suggested the elimination of all plastic bags, for example dog waste bags, bin bags, sandwich bags, zip-lock bags, freezer bags, and the 'reusable' shopping bags (because it was suspected that many are rarely reused, even after the single-use bag ban, and now are even more harmful because of the size).

*'The 'reusable' plastic bags that have replaced some single-use plastic bags. These are not as reusable as advertised, especially if they become soiled or torn on their first use, and contain much more plastic than the original single-use product, making them even worse for the environment. Better to just replace them with a recyclable or biodegradable product, such as heavy duty paper bags, that way it doesn't matter if they can't be reused, or get disposed of improperly.'*¹²

Also attracting criticism (4%) was that which was deemed to be excessive and unnecessary packaging used in deli/bakery/butcher shops and supermarket sections, like bags (including bread bags), plastic-covered paper, often in a bag (large boxes or containers (e.g., for cakes). In addition, plastic or polystyrene trays used for meat, fish, fruit, baked goods, deli (often wrapped in a few layers of plastic) were mentioned by 4%.

'Plastic-lined and non-compostable deli paper should be banned.'
'... frequently a meat tray will have 3 layers of wrapping'
*'6 apples in a plastic tray and plastic bag'*¹³

1 in 4 respondents made suggestions for banning food or beverage related items, with takeaway containers, both polystyrene and plastic, being the most common (9%). This was followed by plastic bottles (such as water, soft drinks, or milk) (5%), and bottle tops/plastic jar lids (5%).

Despite being banned previously, single-use cutlery (including ice-cream spoons, those attached to ready meals in supermarkets), and single-use plates/cups were suggested for banning by 3%. Two per cent (2%) suggest banning the plastic straws (that continue to be seen post-prohibition, such as the ones attached to juice boxes) and 3% suggested banning in-store and restaurant plastic condiment containers and single-use sachets for sauces, spices, butter, and so on.

The third-most frequently mentioned category of items (16%) were balloons (either generic, or specific mentions of helium, water, or air/rubber balloons), and there were requests for a ban on helium balloon releases.

Nine percent (9%) of respondents suggested the banning of plastic cosmetic/personal or home care items, such as microbeads in cosmetics (5%), plastic dental products (such as plastic floss, toothpicks, plastic toothbrushes) (2%), non-compostable nappies, wet wipes, or cosmetic wipes (1%) and plastic bottles containing shampoo, laundry liquid, cleaning products (1%).

Cigarette butts also attracted frequent mentions (7%).

- **Summary of the general population survey respondents' suggestions**

199 members of the general population sample (a lower proportion than those answering the GISA survey) also provided additional suggestions, as summarised in the following table:

<i>Multiple responses</i>	Suggested any item N=199	
All (single-use) plastic should be replaced with a recyclable, compostable alternative	15%	29
Bags for fruit and veg at supermarket/plastic net/fruit and veg protection plastic covers/hard plastic containers for soft fruits	13%	26
Plastic straws	8%	16
Plastic plates and cutlery	8%	15
Cling wrap/glad wrap/all plastic wrappers	7%	14
Any non-recyclable/reusable plastic	6%	12
Excessive packaging (multiple layers or plastic covered boxes)/wrap packaging and fill in plastics used for transportation (e.g., bubble wrap, foam)	6%	12
All plastic bags (including reusable ones): such as dog poo bags, bin bags and liners, sandwich bags, zip lock bags, freezer bags	6%	11
Plastic water bottles/soft drink bottles/milk (including cartons)	6%	11
Balloons	5%	9
Plastic/polystyrene take-away containers/sushi containers/ready-meals packaging	5%	9
Plastic food packaging: such as for pantry items (sugar, pasta, rice, and so on), chocolate, lollipops, chips.../individual serves/biscuit trays	4%	7
Single-use face masks (outside the medical facilities)	4%	7
'Single-use' plastic toys in supermarkets or food chains, tied to products /Large sized plastic toys	3%	6
Small sauce sachets, plastic condiment containers: vinegar, spices	2%	3
Plastic meat/food trays	1%	2
Plastic tree guards	1%	2
Lollipop sticks	1%	2
Plastic bottle tops	1%	2
Shampoo, detergent, cleaning products bottles	1%	2
Cigarettes	1%	2
Other examples (for example, nylon cord, shoelaces, RATs, coffee sachets) or more general (all unnecessary items)	9%	17
Other mentions than plastic (Batteries for electric cars, coal)	1%	2
Yes. Not specified	4%	7

Table 8: Are there any other items you think should be prohibited? Summary of the general population survey responses

Many of the items suggested by the GISA survey's respondents were also included in the list generated by the general population respondents, although they varied in frequency-of-mention and specificity (with the GISA respondents offering a greater number of items and being more specific in their descriptions of many of them).

15% of these respondents suggested the non-specific prohibition of all single-use (or not necessarily single-use) plastics that have a recyclable/compostable alternative available, and another 6% suggested banning any non-recyclable or reusable plastic.

The second-most frequent suggestion (13%) was for produce-related packaging ‘unnecessarily’ used at point-of-sale, for example single-use plastic bags, plastic net bags, plastic boxes, and covers/wraps.

The previously banned single-use straws and cutlery were suggested, along with plates (8%).

6% of these people would like any plastic bag (such as doggie bags, zip-lock, freezer), including (for some) reusable bags, to be banned.

Plastic wrapping (like cling wrap, shrink wrap or ‘glad wrap’) was mentioned by 14 respondents (7%) and 12 respondents (6%) focused on reducing ‘excessive use’ of plastic in packaging (for example, multiple layers, cardboard covered in plastic, plastic inserts). And 7 people wrote about the plastic wrappers/packaging used for food items like chocolate, lollipops, chips, or pantry items.

Various types of bottles or containers were also suggested, such as:

- plastic bottles for water, soft drinks or milk are mentioned – 11 respondents
- small sauce/spices/vinegar bottles, sachets, or jars – 3 respondents
- shampoo, detergent, cleaning products bottles – 2 respondents
- plastic bottle tops – 2 respondents.

3.1.2.3 Opinions of exemptions to single-use plastic bans

Respondents were asked the following question, relating to the list of proposed items:

Do you think any of these single-use plastics might require an exemption?

The conclusion drawn from both surveys is that most people were not in favour of exemptions (or were unsure). Opposition to exemptions was stronger among the GISA survey participants (64%), being significantly more likely to disagree with them than the general population (44%).

Both groups contained people who were in favour of exemptions, showing almost a quarter of the general population (23%) and 14% in the GISA survey responses. There was a larger group of ‘unsure’ respondents in the general population sample (33%) than in the GISA survey (22%).

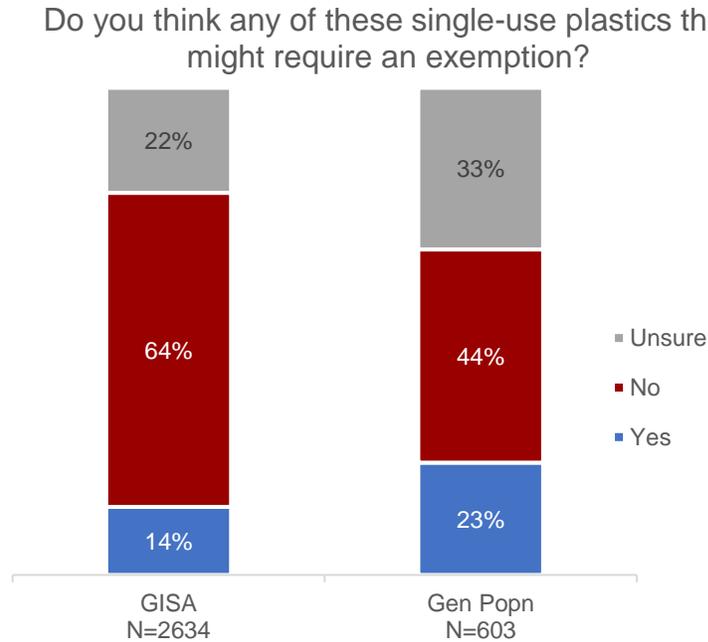


Figure 6: Do you think any of these single-use plastics might require an exemption?

The survey among the sample of the general population asked the 139 respondents in favour of exemptions which items might require an exemption, and the items most frequently nominated were single-use plastic beverage cups (32%), single-use plastic beverage cup lids (30%) and plastic bags (29%)

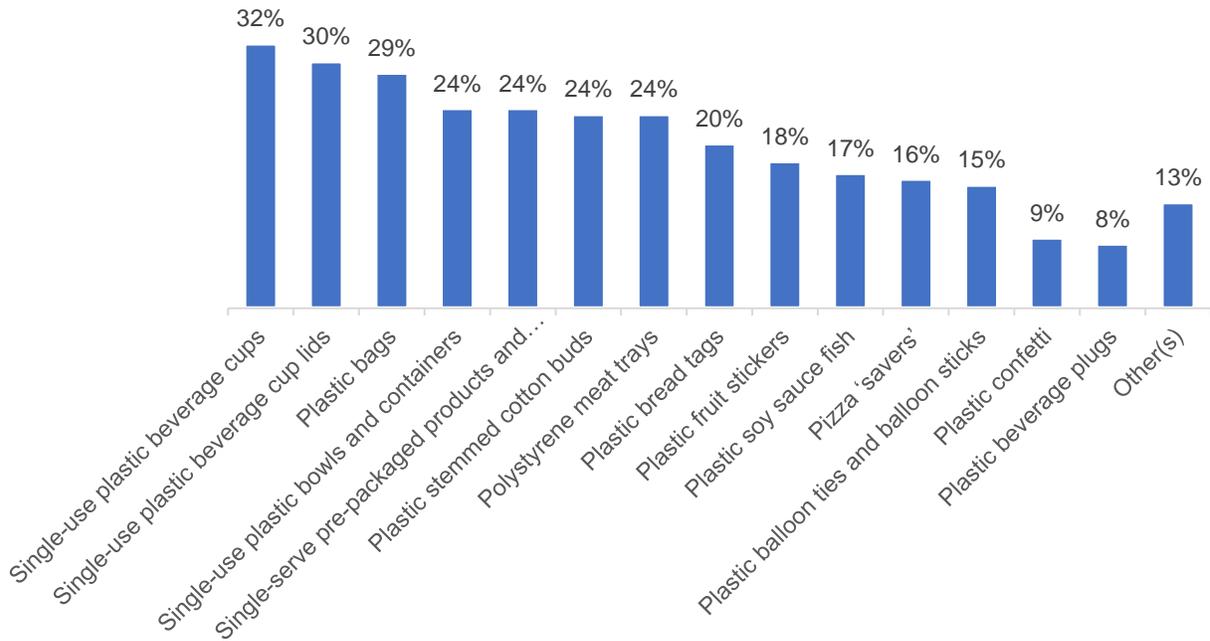
Between 20% and 25% of these respondents suggested exemptions for: single-use plastic bowls and containers, single-serve pre-packaged products and attached items made from plastic, plastic stemmed cotton buds and polystyrene meat trays (all attracting 24%) and plastic bread tags (20%).

Fewer than 20% would consider exemptions for plastic fruit stickers (18%), plastic soy sauce fish (17%), pizza 'savers' (16%), plastic balloon ties & balloon sticks (15%). With plastic confetti (9%) and plastic beverage plugs (8%) being the least mentioned.

13% (18 respondents) selected the 'other/s' option and of them, 9 mentioned plastic straws, 6 suggested medical equipment or any single-use plastics used in medical, or care facilities should exempt.

Which of these items might require an exemption?

Base: Gen Popn survey, people who are favourable to exemptions



N=139

Figure 7: Which items might require an exemption?

38 respondents added a comment to support their preferences. In summary, the exemptions should be applied to:

- items for which the alternative does not meet the consumer's/user's needs
- items for which there is no alternative (yet) available
- items for which the alternative is inconvenient
- items which can be reused, such as meat trays, bags, bowls, and containers
- items for medical, disability or aged care use
- items for which the alternative does not meet /guarantee food hygiene and safety.

'Not everyone is going to carry around their own coffee cup'¹⁴

3.1.2.4 Alternatives to single-use plastics

Respondents were asked the following question:

What alternatives to single-use plastic do you prefer? and they were provided with a list of alternatives to single-use plastics.

The majority in both survey groups would accept either compostable or recyclable alternatives. (57% of the general population and 64% of the GISA Survey group).

The second-most preferred option was for only certified compostable alternatives that can go in a green bin (1 in 5 respondents in the Gen Popn Survey and 1 in 3 of the GISA survey respondents).

The notable difference between responses from the 2 survey samples is the preference for only recyclable alternatives, chosen by 13% of the general population vs just 1% among the GISA survey respondents.

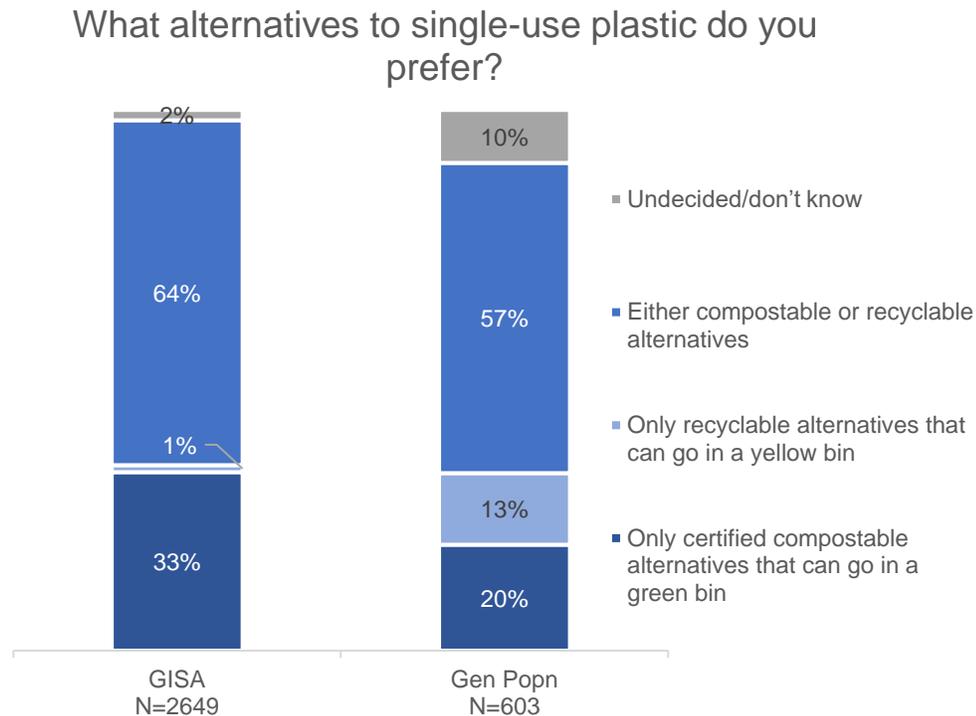


Figure 8: What alternatives to single-use plastic do you prefer?

3.1.2.5 Additional measures to reduce the impact of single-use plastic bags

Respondents were asked the following questions:

Should all shopping bags be certified compostable only?
Should all fruit and vegetable bags be certified compostable only?

The results show that both measures have a broad acceptance within these respondent groups. The GISA survey respondents were more positive (84% in favour of compostable shopping bags and 95% for produce bags) and the general population members were also supportive of both, to a lesser-but-favourable extent (73% in favour of compostable shopping bags and 83% for produce bags).

In both samples, the rejection rate was low, with the highest being 8% against certified compostable shopping bags in the Gen Popn Survey. The people who completed the General Population survey were more indecisive on these topics (12%), than those in the GISA sample (2%).

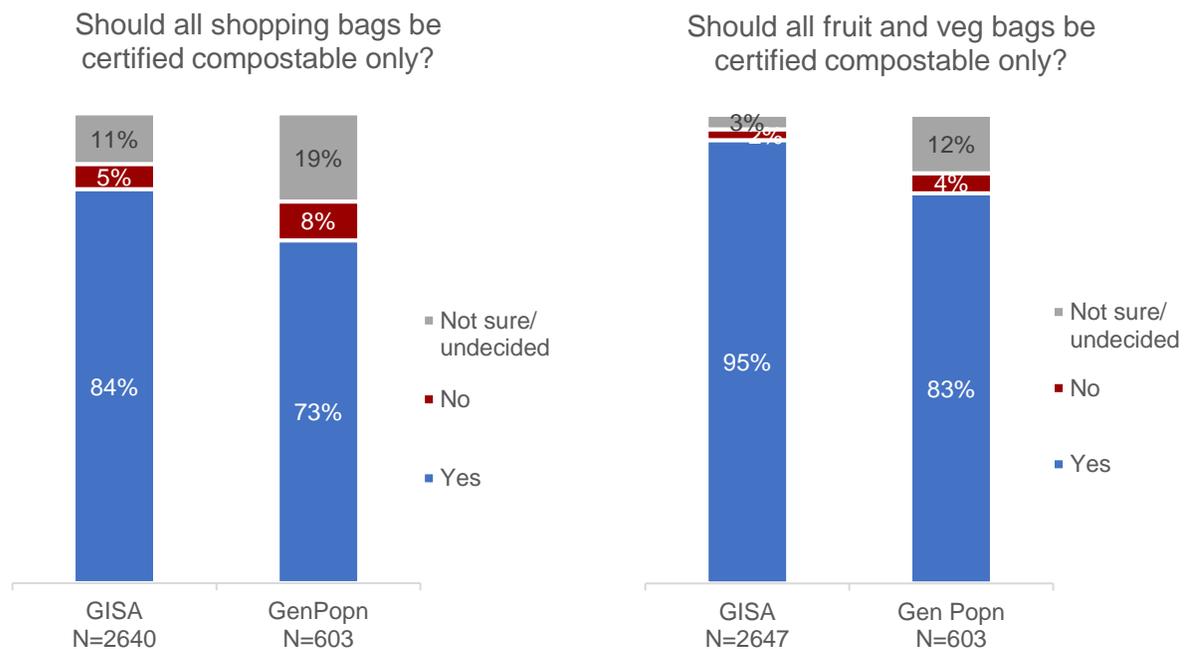


Figure 9: Should all shopping bags be certified compostable only? Should all fruit & veg bags be certified compostable only?

3.1.2.6 Preparedness to choose reusable containers for food and beverages

Respondents were asked the following question:

Would you be prepared to choose a reusable product for food and beverages (cups and containers)?

The majority of the people claimed they were prepared to choose reusable containers for their purchases of food and beverages, and for the GISA survey respondents this was irrespective of the cost (68%). The general population respondents were more price sensitive, with 29% prepared to do so, even if the cost of reusables was higher, and another 47% telling us 'yes, but only if the cost was the same as the single-use items'.

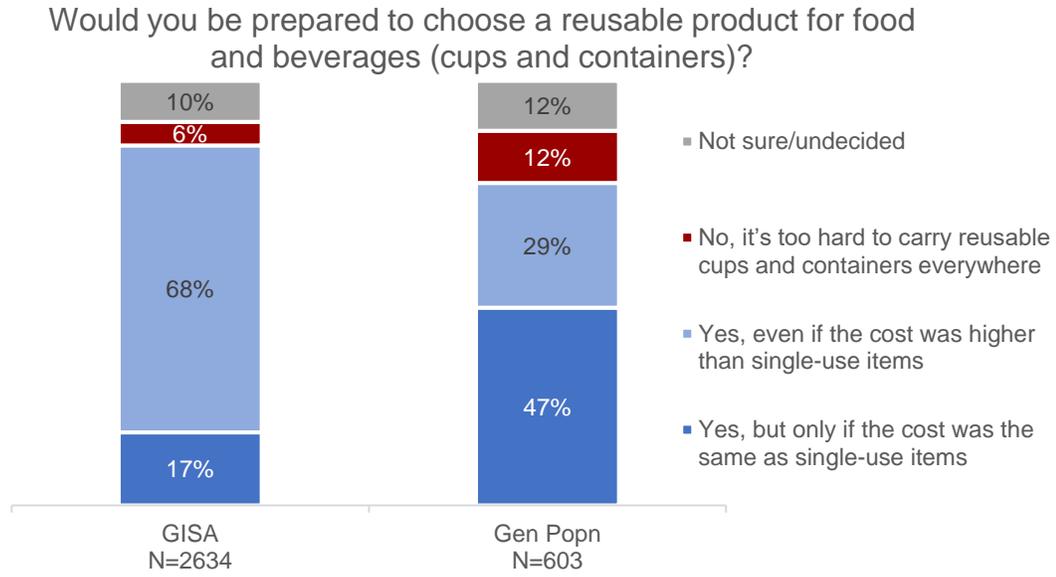


Figure 10: Would you be prepared to choose a reusable product for food and beverages (cups and containers)?

3.1.2.7 Current food waste recycling habits

In collecting feedback and data from these groups of South Australians, GISA also measured food waste recycling behaviour and respondents were asked the following question:

Do you recycle your food waste in your green bin using a compostable bag and kitchen 'caddy'?

The results were measured slightly differently in the two surveys*, yet the conclusions were similar.

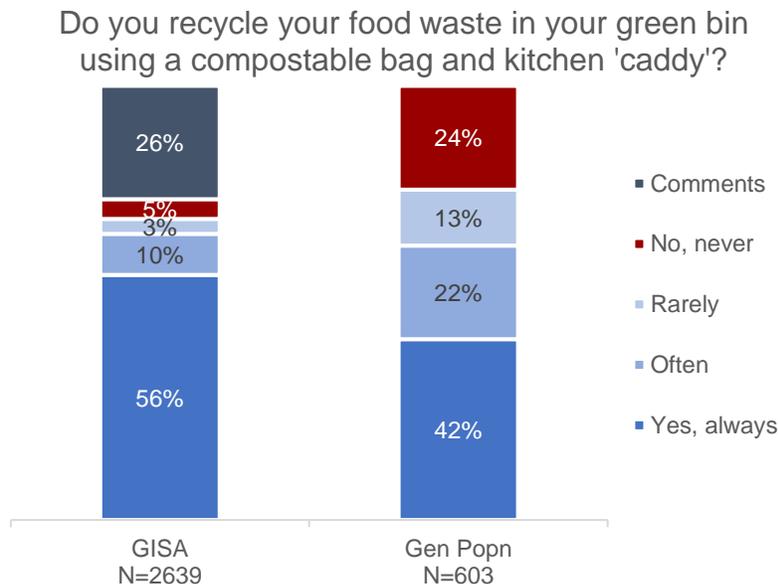


Figure 11: Do you recycle your food waste in your green bin using a compostable bag and kitchen 'caddy'?

- *Gen Popn Survey only had 4 response options: Yes to different degrees (always, often, rarely) and No, never, and once answered, they were provided with the opportunity to add a comment supporting their response
- *The GISA survey enabled the respondents' comments to be embedded among the response options.

The results showed high adoption of the kitchen caddy/green bin method of recycling food waste, reaching around 70% for each group. The GISA survey respondents showed 56% 'yes, always', 10% 'often' and 3% 'rarely' and this would be higher without the 'comments' section in the data). The general population sample showed 42% 'yes, always', 22% 'often' and 13% 'rarely'.

The comments sections in both surveys revealed other home food waste management activities, such as home composting, animal feeding and worm farm usage. Others shared that they use other ways (similar to the kitchen caddy activities) like having a green bin with no compostable bag, employed for specific waste only. And there were a minority with complaints about the lack of green bin availability/access at their location.

3.1.3 OPEN COMMENTS VIA 'YourSAY' PLATFORM and EMAIL

The YourSAY platform also provided an opportunity for visitors to leave comments for GISA, and 20 people made use of this channel with their feedback summarised below.

3.1.3.1 Should South Australia consider banning or restricting this product group?

All the stakeholders responding to this question supported the state's consideration of bans or restrictions of the proposed product group.

'Fully support that we should prohibit everything that is listed in 'Turning the Tide' document'¹⁵

'There should be a blanket ban of plastics across every business in Australia.'¹⁶

'The only way to achieve this is through government intervention. I'd be proud to be South Australian again if we led the way in these things!'¹⁷

There were also recommendations to mandate content that is either recyclable or compostable for all other plastic products. This was suggested to remove confusion and prevent waste to landfill.

'All plastic products should be made from recycled content, including textiles, with the aim of getting close to 100% recycled content.'¹⁸

There were people who supported further bans and changes to the ways in which South Australians use plastics.

'I would like to see South Australia supporting all parts of the supply chain to move away from the use of plastics altogether, and as soon as possible ... so yes please, consider prohibiting more single use plastic products.'¹⁹

3.1.3.2 Are there viable alternatives, and if so, what are they?

These respondents suggested either, or both, recyclable and compostable items as viable alternatives to banned SUPs.

'There are so many alternatives to plastic which can be recycled or composted.'²⁰

Other suggestions were:

- plastic produce punnets to be replaced by cardboard punnets
- plastic water bottles to be replaced by canned water and/or reusable bottles.

3.1.3.3 What sort of exemptions, if any, may be needed?

No responses addressing this question were received.

3.1.3.4 What are the health, economic, logistical or social issues that should inform any decisions?

No responses addressing this question were received.

3.1.3.5 What sort of timeframes should be considered?

There was appetite to implement this as soon as possible and it was suggested that incentives could be offered to industry to increase the speed of change.

'The faster the better'²¹

3.1.3.6 How long would businesses, industry and supply chains need to prepare?

No responses received addressing this question.

3.1.3.7 Other areas suggested for focus

People also contributed advice and opinions on areas relating to the questions posed, and issues raised, in the discussion paper. These have been summarised below.

- **Additional suggestions for items to be banned**

These stakeholders provided the following suggestions for items to be added to the list of prohibited products:

- soy sauce fish
- plastic-based glitter
- plastic cling film
- cotton buds on sticks
- plastic tops on takeaway drink cups, or coffee cups
- balloons
- plastic microbeads in facial scrubs
- yoghurt/custard squeeze pouches
- plastic-wrapped vegetables, such as carrot, bananas, apples
- plastic lined paper/board
- bubble tea cups
- iced coffee cups
- letters with plastic windows
- non-recycled content textiles
- anything harming oceans and environment
- everything not fully compostable

- disposable masks
- commercial fishing products
- foamed plastic packaging
- fruit stickers
- plastic cups
- plastic plates
- thick plastic bags
- plastic produce containers, such as for blueberries, tomatoes, mushrooms
- thin plastic packaging
- thin plastic produce/supermarket product bags
- toy packaging from China
- cigarette packaging
- toiletries packaging
- whitegoods packaging
- plastic net bags/mesh containing fruit multiples
- tiny coat hangers used for socks and other clothing items.

- **Consumer awareness and education requires further attention**

It was suggested that consumer education programs provide information and target behaviour change through:

- managing SUP alternatives
- correct disposal of SUP alternatives
- correct disposal of all waste via programs such as REDcycle
- encouraging disposal of soft plastics
- labelling and identification of bins to reduce disposal errors.

*'I see a lot of compostable straws and cups ending in the general waste bin.'*²²

*'Make it the cultural norm to think about the waste we're producing in our day to day lives.'*²³

- **Expanding opportunities for, and access to, recycling**

It was suggested more public facilities are provided for the correct disposal of waste like recyclables and compostables.

*'... there is often no facility for recyclable material disposal when in public so these materials are just ending up in landfill anyway.'*²⁴

*'Would it be a ridiculous idea to install self-service 10c bottle refund machines at high traffic areas/supermarkets?'*²⁵

*'... making recycling of foamed plastic easier?'*²⁶

This included the recommendation that the supermarket-based RedCycle scheme is expanded to offer more locations and opportunities for plastic drop-off. For instance, schools were suggested to encourage instilling this behaviour in the young.

- **Increase the use of compostable plastics in SUP items**

It was recommended that the use of compostable plastic(s) in takeaway lids, cups and containers should be increased. Some took this further by requesting that all items are compostable.

*'... there really needs ample pressure placed on these manufacturers and retailers to ONLY create fully 'compostible' (sic) products using recycling materials...'*²⁷

*'Recyclable materials should only be used when biodegradable materials are less appropriate...'*²⁸

- **Initiatives, rewards and incentives for consumers, households, and businesses for correct behaviour, avoiding SUPs and using and promoting SUP alternatives**

Businesses and consumers who actively use and promote the use of SUP alternatives should be rewarded for their part in avoiding SUPs.

*'Promote initiatives that encourage businesses to avoid single-use items in the first place.'*²⁹

*'Encourage businesses to sell reusable cups.'*³⁰

In addition, it was recommended that households are incentivised to recycle correctly.

Another suggestion was to prohibit plastic net packaging, such as for multiple fruits, and offer quantity discounts at point of purchase.

It was recommended that consumers could receive discounts for bringing their own containers to points of purchase.

*'We need to offer discounts for bringing your own containers to help people move to thinking more responsibly.'*¹⁷

- **Stop the greenwashing**

There were complaints about items that presented themselves as being environmentally friendly but were discovered not to be so. It was requested that these are removed from circulation.

*'Another big issue is paper in the guise of being eco friendly when it is actually lined with plastic.'*³¹

*'I don't trust that some of these cups are actually 'bio-cups'.'*⁰⁴

- **Disincentivising non-recyclable and/or compostable items**

Applying a tax on items that are not able to be recycled or composted will, it was suggested, incentivise manufacturers to *'prepare a life cycle plan for their materials.'*³²

*'An appropriate tax will make it more attractive to use responsible materials rather than just stick with cheap plastics.'*¹³³

Another suggestion was to charge consumers for the supply and use of SUP items.

*'Charge every time someone uses takeaway plastic.'*¹³⁴

- **Return to glass bottles**

Some respondents requested that SA returns to using glass bottles because they are better for the environment and beverages taste better in them.

- **Provide an avenue for reporting non-compliance**

One respondent asked if there was a platform where consumers could report businesses failing to comply with the ban.

- **Mandating use and supply**

The state may consider mandating the items which can be used and/or supplied in specific settings, for example, food courts to only provide reusable cutlery and plates.

Drinking fountains were also suggested as a mandated alternative to SUP bottles.

Installing/supplying microplastic filters in washing machines was another suggestion for mandated compliance.

- **Improve the range and quality of alternative products**

We were told it would be easier to adopt a plastic free lifestyle if the range and quality of alternatives was improved.

*'I've been trying to cut out plastic waste but its sooo hard. Its (sic) impossible to find flouridated (sic) toothpaste in anything other than plastic tubes. What about glass? Shampoo and conditioner also. The shampoo bars are not great for all hair types... more bulk buying items that you refill into your own containers is a great step ... we should not be wrapping this stuff in plastic.'*¹³⁵

3.2 GOVERNMENT, NGOs, SHARED INTEREST, WASTE AND RESOURCE RECOVERY AND INDUSTRY STAKEHOLDERS

3.2.1 FEEDBACK FROM THE STATE AND LOCAL GOVERNMENT SECTOR

Responses were received from the following state and local government stakeholders:

- Adelaide Hills Council
- City of Burnside
- City of Holdfast Bay
- City of Marion
- City of Mitcham
- City of Norwood Payneham & St Peters
- City of Victor Harbor
- Green Adelaide.

3.2.1.1 Should South Australia consider banning or restricting this product group?

There was broad agreement with the discussion paper's intentions and support for the reductions and prohibitions of the items mentioned therein. Some councils demonstrated interest in seeing the scope of the legislation expanded to include additional items not identified for phase-out in the discussion paper, and suggested additional items to be banned, and ways to support the legislation and foster behavioural change in the community.

'The intention to ban single-use plastic food containers (page 23) when other states and countries have not tackled this issue is to be commended and shows that South Australia is again showing leadership in waste'³⁶

'The Council commends the Minister and the State Government for taking action to address additional, problematic and non-recyclable single-use plastic items through legislation.'³⁷

These councils provided a range of rationale for their support of the suggested initiatives, which have been summarised in the following points:

- Financial benefits through reduction to landfill, composting, and waste stream contamination
- Reduced litter in parks, reserves, and waterways
- Opportunities for positive changes to community consumption and waste education and related behaviour via:
 - education around removing confusion about recycling and composting
 - creating (new) social norms around reuse and sustainability
 - compostable packaging
 - encouraging reuse
 - encouraging alternative to single-use plastics
 - protection of marine and bird life.
- Environmental benefits via reduction in waste stream contamination

- Enables simple, consistent, and clear consumer education/messaging surrounding waste disposal.

3.2.1.2 Are there viable alternatives, and if so, what are they?

The following table summarises the state and local government respondents' suggestions for viable alternatives to (some of) the targeted single-use plastic items:

Single-use plastic item	Suggested viable alternative
Fruit stickers	- Laser technology - Shelf branding, labelling and presentation
Pizza savers	- Cardboard
Plastic confetti	- Rice, paper, petals, leaves, tissue paper, bubbles
Plastic cups & lids	- Certified compostable and recyclable cups and lids - BYO/Keep Cups - Swap-and-Go exchange system at point of purchase/mug libraries - Not to include recyclable cups/lids
Plastic beverage lids	- Cardboard (like straws) for cold (and possibly hot) beverages
Plastic food containers, bowls and plates	- Compostable & recyclable items
Plastic-stemmed cotton buds	- Numerous more sustainable alternatives (not specified)
Plastic beverage plugs	- Inbuilt stoppers (in lids) - Paper, wood, bamboo alternative
Plastic bread tags	- Cardboard tags
Plastic bags	- Paper, cardboard, woven bags, and boxes - Compostable - BYO
Plastic soy fish/sauce sachets	- Requesting for it to be added at point of purchase
Plastic ties with a metal strip	- 100% recycled cardboard tags
EPS food containers and trays	- Materials which are recyclable through kerbside co-mingled recycling or certified compostables - Plant-starch-corn based products
Takeaway plastic-lined cardboard food containers	- Cardboard - Certified compostable alternatives - BYO - Swap-and-Go exchange
Takeaway plastic windowed cardboard food containers	- Cardboard - Certified compostable alternatives - BYO - Swap-and-Go exchange
Single-use to be replaced with compostable, at every opportunity	- Compostable containers, cups, and lids (certified compostable to AS4736-2006, AS5810-2010)
Post-purchase packaging	- Plant-starch-corn fillers
Food industry EPS cool boxes	- Plant-based or cardboard-based/waxed products
Plastic confectionary sticks	- Wood or cardboard alternatives

Single-use plastic item	Suggested viable alternative
Pre-packaged food wrap, such as ice creams, chocolates, chips	- Current and improved paper packaging
Plastic box strapping	- Non-PET, 100% biodegradable product

Table 9: Summary of suggested viable alternatives from the state and local government submissions

It was recommended that, where there are no viable alternatives (at present), ongoing investigation, consideration and assessment will be required and possibly, a delay in their prohibition if alternatives are not currently available.

‘As some products e.g. soy sauce fish containers (page 29) cannot be easily substituted there will need to be a continual assessment of other products that will ensure that alternatives can be identified for these products in the future’³⁸

‘Certified compostable cups and lids should be allowed...’³⁹

‘The CHB supports the ban of plastic-stemmed cotton buds by March 2023... There are now numerous more sustainable alternatives.’⁴⁰

‘The CHB supports the ban of fruit stickers by 2025. This later timeframe allows for more non-plastic options to be developed and become more widely available. This includes the potential use of lasers, which are more efficient in terms of energy use, cost and not using plastics.’⁴¹

3.2.1.3 What sort of exemptions, if any, may be needed?

Some of these respondents stated there was no need for exemptions, or none other than those mentioned in the discussion paper – unless it was discovered that specific sectors of the community were disadvantaged by the prohibition of one or more single-use plastic products, such as disability and aged care.

‘No exceptions are needed.’⁴²

Others made mention of exceptions for compostable ‘plastics’ when prohibiting single-use beverage cups, such as for 100% compostable single-use cups and/or 100% recyclable single-use cups, where they can be recycled via the household kerbside stream.

‘As kerbside recycling of recyclable cups is not currently feasible, the CHB suggests investment into technology that allows for easier recovery of recyclable coffee cups in the future.’⁴³

In several responses there was specific mention of **not excluding** recyclable coffee cups, recommending that 100% recyclable coffee cups are not to be excluded because of unviable/inaccessible recycling systems, consumer confusion, potential for increased kerbside and public waste contamination.

‘We strongly disagree that the ban excludes 100% recyclable coffee cups through widely available services; and feature clear and prominent labelling regarding which bin(s) to place them in.’⁴⁴

*'there are no viable recycling systems in Australia to recycle coffee cups. Cups and lids would be sent overseas for recycling and would likely be downcycled if recycled at all. This does not support the circular economy.'*⁴⁵

3.2.1.4 What are the health, economic, logistical or social issues that should inform any decisions?

In summary, this group of stakeholders mentioned the following related issues to support the prohibition of single-use plastic items in future decision making:

- saves waste cost to councils
- simplifies consumer waste disposal
- improves waste management and resource recovery
- increases local employment.

There were also related issues that were against prohibition or in support of delays to implementation:

- ensure all community sectors have been consulted to safeguard against disadvantage or inequity
- educate consumers, enable behavioural change
- educate manufacturers, enable lead-time to transform and protect sustainability
- educate retailers, enable lead-time to transform and protect sustainability.

There may be a case for a longer lead time when banning plastic beverage plugs (or splash sticks), following exploration and consultation with the disability sector. The additional time could provide an opportunity for industry to develop a sustainable alternative, such as inbuilt plugs in the design of compostable beverage lids

*'... the City of Marion suggests consulting the disability sector about the implications of simply banning plastic splash sticks outright as a way of encouraging industry to pursue alternative options...'*⁴⁶

For many consumers, waste disposal pathways are confusing and require improved clarity of information to prevent contamination of waste streams.

*'As per the report on page 20 recycling confusion is especially evident with coffee cups and lids and 'clear and prominent labelling' will be crucial to the success of this approach. This should also include the differentiation between degradable, biodegradable and compostable.'*⁴⁷

Confusion surrounding the disposal of single-use cups and lids was mentioned frequently, particularly if they were made differently from each other, for example, compostable cup with recyclable lid. This led to the recommendation for cups and lids to be matched so the consumer's (single) disposal action was clear.

*'... the lid must be 100% compostable or 100% recyclable via the same stream of the cup the lid is on.'*⁴⁸

‘... there is confusion for consumers regarding lids because retailers are mixing certified compostable, recyclable, landfill materials and food/beverages into one product. For example, a milkshake could be placed in a certified compostable cup with a plastic lid and a paper straw. This is confusing for consumers and the result is additional waste to landfill; or contamination of recycling and/or organics bins.’⁴⁹

3.2.1.5 What sort of timeframes should be considered?

While all agreed on the requirement to ban single-use plastic items, different councils proposed different timelines, recommending that the following factors and timelines should be considered:

- sufficient time to provide suitable alternatives so that businesses are not impacted
- as soon as practicable if the transition (to sustainable alternative/s) has already begun, enabling compostable alternative to become the norm more rapidly
- sufficient to allow for effective industry and community education around the right ways to recycle/reuse/dispose etc.
- ensure industry has time to investigate sustainable alternatives.

The respondents mentioned the following items to be banned in Stage 3, no later than **March 2023**:

- fruit and vegetable produce bags in self-serve locations, for example, fruit and veg departments
- plastic barrier bags behind counters, such as at deli and meat retailers
- plastic bags currently used in the purchase of all foods, such as meat, deli, bulk food (phased option proposed)
- balloon sticks, ties, and holders
- plastic-stemmed cotton buds
- plastic confetti
- pizza savers
- SUP coffee cups and lids (including 100% recyclable)
- plastic cups
- plastic plates
- plastic bowls
- plastic food containers
- thick plastic bags
- fruit stickers
- other EPS consumer food and beverage containers
- EPS trays used for meat, fruit, and other food items for retail sale
- pre-packaged and attached products
- takeaway plastic-lined cardboard food containers
- takeaway plastic windowed cardboard food containers.

‘Banning thick plastic bags would also aid in reducing contamination of recycling and presents an opportunity to move away from the linear model of

produce, consume, dispose and toward a circular model of with production and reuse of carry-bags.⁵⁰

'Plastic bags, light or heavyweight, are still considered single-use and are only used once or a handful of times before they are disposed of.'⁵¹

'... it is proposed that it be mandatory for the recyclability or compostability of the cup and lid to be compatible, i.e. both cup and lid combined are certified compostable and/or 100% recyclable and do not need to be separated for correct disposal.'⁵²

'Given that these are not required by law in Australia and many other fruit and vegetable items do not have any labelling, it is the Council's view that fruit stickers can be phased out earlier, Stage 3...'⁵³

Products to be banned in Stage 4, no later than **March 2024** include:

- other polystyrene food products
- polystyrene meat trays
- thicker style plastic carry bags
- single-use plastic cups, unless compostable or recyclable via widely available services
- single-use plastic lids (for beverage cups), unless compostable or 100% recyclable via widely available services
- single-use plastic food containers, bowls, and plates
- statewide phaseout of plastic bags currently used in the purchase of all foods, such as meat, deli, bulk food
- plastic beverage plugs
- plastic bread tags
- plastic ties with a metal strip.

'... there is significant confusion around how to dispose of these polystyrene items, especially considering they can look similar to recyclable plastics.'⁵⁴

'Single-use plastic cups are a common contaminant in City of Mitcham kerbside bins and particularly in our public place bins. The use of complex-mixed materials in many single-use plastic cups (particularly coffee cups) causes significant confusion for consumers, even those who are consciously trying to improve their waste behaviour.'⁵⁵

'Ideally, we would like to see this item (thick plastic bags) banned earlier, in Stage 3.'⁵⁶

Products to be banned in Stage 5, no later than **March 2025** include:

- pre-packaged and attached products
- fruit stickers
- balloons
- EPS trays for meat, fruit, and other items
- EPS food and beverage containers
- plastic beverage plugs

- plastic bread tags
- soy fish
- plastic sauce sachets.

*'Therefore, as one of the legislation's key goals is to protect marine life from avoidable single-use plastics, we support the ban of balloons.'*⁵⁷

*'In light of New Zealand's experience with introducing a ban on fruit stickers as part of its single-use plastic legislation and their industries seeking more time to execute technically...'*⁵⁸

*'The City of Marion advocates for the inclusion of bread tags in the fifth stage of the legislation... puts industry on notice to develop alternatives...'*⁵⁹

3.2.1.6 How long would businesses, industry and supply chains need to prepare?

Without offering specific timeframes, it was recommended that these sectors would require sufficient time to enable the research and development of sustainable alternatives.

*'It is unlikely business would have a years' worth of single-use plastic coffee cup and lids. Since the introduction of the waste avoidance act in 2020 many cafes have already moved towards compostable alternatives.'*⁶⁰

*'As Queensland, Western Australian and Victoria have already banned or flagged banning plastic food containers, bowls and plates, the CHB believes that the timeframe for the ban is more than adequate for industry.'*⁶¹

*'The proposed timeframe should allow sufficient time for businesses to establish recyclability or compostability of current product, make any necessary changes and for manufacturers to manage higher demand...'*⁶²

In some cases, it was pointed out most retailers have already made the decision to provide only compostable and/or recyclable products and therefore would not require much, if any, time to prepare for a change in legislation.

*'... there are readily available alternatives available (sic), and these alternatives have already been taken up by numerous food businesses which suggests that barriers are low.'*⁶³

3.2.1.7 Other items, actions, and suggestions by these respondents

- **Additional items for current/future consideration**

In addition to the items listed for specific prohibition, the following were forwarded for further consideration and inclusion (now or in the future):

- excessive fruit and vegetable plastic packaging and wrapping
- expanded polystyrene beads (used for bean bags)

- mandatory for cups and lids to be compatible, for example, both compostable and/or both recyclable
- plastic/foil sauce sachets
- plastic 'grass' separating/decorating takeaway sushi
- plastic ties with a metal strip
- takeaway plastic-lined cardboard food containers
- takeaway plastic windowed cardboard food containers
- balloons
- fireworks
- loose fill consumer packaging (to fill packing voids)
- moulded consumer packaging (to fill packing voids)
- EPS cool boxes for food industry use
- fishing bait bags
- non-biodegradable ziplock bags
- convenience food packaging, such as ice-creams, chocolates and chips
- plastic box strapping (blue, yellow, white, black)
- plastic bottle tops and caps
- nylon rope.

*'We suggest that future considerations of the Single-Use Plastic Ban Act should also be given to other single-use plastic consumer items that commonly contribute to marine pollution in South Australia in addition to these.'*⁶⁴

*'The issue with the plastic bread ties with a metal strip is they are not recyclable due to their design of mixing plastic and metal. These single-use items are ultimately destined for landfill when there is a recyclable (or compostable given its size) alternative that can be made from 100% recycled cardboard.'*⁶⁵

'... Council would also like the inclusion of prohibiting the future supply, sale and distribution of:

- *Loose fill consumer packaging which is used to fill empty spaces in packages that contain lightweight products*
- *Moulded consumer packaging, which is used for consumer product protection in packaging for white goods and electronics, including but not limited to computers, microwaves, fridges etc.'*⁶⁶

- **Additional actions for supporting the legislation**

In addition to suggestions for specific items to be prohibited in future stages of the legislation, a number of additional recommendations were forwarded, with the objective of strengthening and supporting its implementations and attaining its desired outcomes. These have been summarised by the following:

- **Plastic fruit wrapping:** Ensure alternatives to plastic fruit wrapping are available prior to bans and/or restrictions, including state government support to develop and promote non-plastic options.

- **EPS:** It was suggested that, by March 2025, all expanded polystyrene foam (EPS) consumer food and beverage containers not previously included in the March 2022 Stage should be banned.
- **Implementation:** The staged approach is critical to success
- **Lids:** Add lids to single-use plastic food and beverage containers, whenever described or acted upon.
- **Disability access and inclusion:** Consultation with the disability sector around the topic of plastic beverage plugs (or 'splash sticks') was recommended. On this point, it was also recommended that industry is encouraged to develop novel ways of preventing spills from takeaway beverages in single-use containers.

- **Consumer behaviour change**

To support consumer behaviour changes, education and labelling recommendations aimed at all stages of the supply chain were as follows:

- consumer education surrounding correct disposal of different items, such as small plastics, mixed plastics, fine materials
- consumer and retailer education to encourage 'Bring Your Own' containers to retailers
- consumer education around the difference between, and disposal of, (certified) compostable and biodegradable products
- consumer education around correct disposal of compostable cups in kerbside collections
- consumer education and prompting to encourage bringing of reusable bags
- consumer education on reading and understanding product labelling
- consumer education around the reuse and correct disposal of compostable plastic bags (supplied when purchasing food) in kitchen caddies and green bins
- consumer education on reusable vs single-use
- consumer education on the correct disposal of small plastic items, such as soy fish, bread tags
- education aimed at the recreational boating and fishing community to raise awareness of the issues of marine waste, how to dispose and recover it
- retailer education on labelling and manufacturer education/specification on labelling messages and placement
- retailer/vendor education on procurement of correct/compliant items
- industry education on resource recovery
- manufacturer education on instructions for correct disposal of their products (via labelling)
- waste industry education on opportunities to improve recycling of EPS foam.

*'... the Council is advocating for clear and prominent labelling to be included on packaging for single-use compostable alternative to allow consumers to easily understand which bin they can be placed in to ensure reduced waste to landfill.'*⁶⁷

*'Clear labelling on the alternatives and requirements of use of the Australian Compostable Standard logo are key to reducing confusion for both residents and industry, who are unsure about what alternatives should be used.'*⁶⁸

- **Helium balloon releases**

It was recommended that unsecured and/or intentional helium balloon releases are prohibited via an amendment to the *Local Nuisance and Litter Control Act 2016*.

*'... target intentional helium balloon releases by amending the Local Nuisance and Litter Control Act so that it may be applied to 'litter to land, water and in the air' in an effort to further reduce pollution associated with balloons.'*⁶⁹

- **Single-use sauce packets**

Resourcing was suggested for the implementation of point-of-sale recycling stations for soy sauce fish.

It was also suggested that further research should be encouraged and committed to develop alternatives for single-use condiment packets such as soy sauce fish.

*'A commitment to further research would be beneficial for these items as they are not readily recyclable and are frequently littered.'*⁷⁰

- **Inbuilt beverage stoppers**

It was recommended that there is widespread implementation of inbuilt stoppers to replace plastic beverage plugs.

- **Banning black plastics**

One Council suggested discouraging and eventually banning black plastics due to issues in identifying and sorting these at Material Recovery Facilities.

*'The CHB propose that the South Australian Government advocate at the National level for a phase out of black plastics that are otherwise recyclable at the kerbside as another colour.'*⁷¹

- **Mandating compostable standards**

A council suggested mandating the adoption of the Australian Standard AS4736-2006 for compostable products for all suppliers of compostable items.

- **Bottle lids**

Since bottle lids are an issue at Material Recovery Facilities, it was suggested that attention be paid to ways of increasing their recovery and decreasing litter.

*'PET bottle recycling is an effective measure in SA and other states, and consideration should also consider their equivalent lids. Supporting innovation in product design could benefit a solution.'*⁷²

- **Compostable barrier bags**

The exploration of more ways to encourage the supply and use of certified compostable barrier bags for food packaging at point of sale was suggested, to foster widespread behavioural change among consumers and retailers.

‘Using compostable bags, similar to the kitchen caddy liners provided by the local government will provide a link to the kerbside organics bin but will also reduce the need for consumers to separate soft plastic recyclables from organic waste.’⁷³

- **Supporting innovative product design**

There was support for developing more opportunities for the innovation of product design to promote the advancement of sustainable alternatives, and to promote industry participation and production. In some cases, a respondent mentioned, plastic packaging and products were converted from a sustainable solution to a plastic one and this could be investigated and reverted. In others, there is an opportunity to kickstart innovation through inviting and rewarding future-focused designs.

Consideration should be given to reverting frozen conveniences (e.g. single-use ice-creams) back to the paper packaging or improving the paper packaging to eliminate wastage or longer term storage (the assumption is that these products were converted from paper to plastic to prolong shelf life consumption?).⁷⁴

- **Opportunities for product stewardship**

In addition to the legislation, suggestions for increasing attention to opportunities for improving product stewardship were also mentioned, as follows:

‘This could include identifying opportunities to improve how changes in product stewardships (e.g. deposit legislation) will mitigate the impacts from debris, develop strategies to better engage stakeholders in the management and prevention, and identify behaviours and social and cultural values that will either exacerbate or mitigate these key issues.’⁷⁵

3.2.2 FEEDBACK FROM NON-GOVERNMENT ORGANISATIONS (NGOs) AND SHARED INTEREST GROUPS

Responses were received from the following NGOs and shared Interest Group stakeholders:

- Boomerang Alliance
- Australian Marine Conservation Society
- Conservation Council SA
- KESAB Environmental Solutions
- No More Butts
- WWF Australia.

3.2.2.1 Should South Australia consider banning or restricting this product group?

While all stakeholders showed their support for SA’s SUP leadership and were in favour of the proposed restrictions, most believed the South Australian Government should aim for greater restrictions and prohibitions than were being proposed in the discussion paper, and/or to advance proposed timelines.

‘We urge the SA Government to once again take a leadership role and set its ambitions high, showing a commitment to national harmonisation while also setting the standard higher with the elimination of plastic takeaway containers. With such action, we can rapidly reduce the plastic flowing into the natural environment and stem the tide of pollution that is killing ocean wildlife.’⁷⁶

‘The Government is to be commended on taking sustained, positive steps towards plastic waste reduction in South Australia. The Conservation Council is supportive of a rapid transition away from all unnecessary plastic products and the environmentally damaging waste that they create...’⁷⁷

3.2.2.2 Are there viable alternatives, and if so, what are they?

The following table summarises these respondents’ suggestions for viable alternatives to (some of) the targeted single-use plastic items:

Single-use plastic item	Suggested viable alternative
Plastic takeaway food containers	- Bagasse containers - Reusable, non-plastic or certified compostable alternatives
Disposable plastic plates and bowls	- Reusable and compostable alternatives
Plastic cotton buds	- Cardboard and bamboo buds - Wooden or non-plastic alternatives or avoidance
Plastic balloon sticks and accessories	- Cardboard and bamboo alternatives - Wooden or non-plastic alternatives or avoidance
Plastic fruit stickers	- Compostable options - Organic dyes, printing directly on skin - In-store signage

Single-use plastic item	Suggested viable alternative
Plastic confetti	- Paper, petals, and other natural confetti
Plastic bread tags	- Cardboard tags
Plastic wrapping on magazines	- Home compostable wrapping
Plastic corflute tree guards	- Fully compostable corflute
Plastic bags	- Compostable checkout bags
Plastic barrier bags	- Compostable bags also used in kitchen caddies
Single-use plastic cups and Lids	- Compostable, recyclable, 'keep cups' reusable cups
Soy fish and condiment sachets	- Self-serve sauces at point of purchase
Plastic cigarette filters	- Filter-less cigarettes
	- Biodegradable filters
	- Reusable filters
	- e-cigarettes

Table 10: Summary of suggested viable alternatives from the NGOs and Shared Interest Group submissions

*'A suitable alternative exists to plastic bags which when disposed of correctly is compostable and also works towards meeting food waste diversion targets.'*⁷⁸

*'All these items can be avoided or replaced through practice change or switching to preferred alternative products.'*⁷⁹

3.2.2.3 What sort of exemptions, if any, may be needed?

One suggestion for an exemption was for food takeaway services, who may be permitted to provide a paper bag upon request and in specific circumstances.

*'Exemptions for food takeaway services could be considered where outlets are permitted to only provide a paper bag (without handles, FSC accredited and 80% recycled content) when this is needed.'*⁸⁰

While only this specific exemption was mentioned by these stakeholders, the advice was to ensure that the needs of all sectors and consumer groups were considered before moving forward with prohibitions.

*'As with the banning of the first wave of single-use plastics, the banning of each of these items will require considerations of exemptions for specific sectors or consumer groups based on individual needs and viable alternatives to meet those needs.'*⁸¹

In addition, there were recommendations for single-use plastic coffee cups to be banned **without exemption**, even if they are or become, widely recyclable.

'Plastic cups and their lids are used on the go and discarded carelessly, and therefore commonly end up in waterways where they can break down into sharp pieces that harm wildlife when they become caught in holes or eat the

*small plastic pieces. As such, we urge SA to ban these single-use plastic items without exemption – even if they become recyclable in the future.*⁸²

3.2.2.4 What are the health, economic, logistical or social issues that should inform any decisions?

There may be benefits to industry if viewed through an entrepreneurial lens. For some plastic items, such as plastic soy sauce fish, there do not appear to be sustainable alternatives, and it was suggested that a ban on the item(s), plus incentives and support will kickstart and create an opportunity for industry to innovate to meet retailer/consumer needs.

*‘As well as banning particular items it will be critical to consult, inform, and work with all key stakeholders throughout this process. Incentives and rewards should be offered where needed to industries that remove single-use plastics.’*⁸³

*‘We urge the SA Government to ban this plastic item in order to kickstart the development and uptake of sustainable alternatives’*⁸⁴

The act of banning products or product types was also identified as a mechanism for promoting the government’s message of sustainability to manufacturers and consumers of problematic plastic. It was suggested that this legislation possesses that power and should employ it.

*‘By explicitly banning these plastics the SA government can keep them out of waterways and also send the signal that wasteful and unnecessary plastics such as these will no longer be tolerated.’*⁸⁵

It was thought that there is an increased cost to retailers in supplying compostable barrier bags and although some bear the costs (on ideological grounds), others may not be willing to do so and may pass on the penalty to consumers. Therefore, consideration of ways to safeguard customers should be undertaken by government.

*‘This may mean passed through increased cost to consumers. Alternatively, some incentive may be provided to business to offset this cost.’*⁸⁶

Some respondents acknowledged that, no matter the chosen pathway for managing the disposal of beverage cups and lids in the future, attention must be paid to the infrastructure and education dealing with their disposal and recovery.

*‘... should fully recyclable or compostable cups be adopted these must be supported by public bin infrastructure (they are rarely used at home), clear labelling and infrastructure to enable recycling’*⁸⁷

In banning some plastic bags, it was cautioned, there may be a ‘potential spike in the sale of non-oxo-biodegradable bin liners’ and that education and the provision of viable alternatives will be key to compliance.

*‘Consumer education will be key to both acceptance and take up of alternatives, including reusable alternatives, and of ensuring correct disposal of single-use products to ensure they are recycled at the highest possible value.’*⁸⁸

3.2.2.5 What sort of timeframes should be considered?

The respondents mentioned the following items to be banned in Stage 3, no later than **March 2023**:

- Plastic produce bags/plastic fruit and vegetable barrier bags
- All single-use plastic bags and other 'highly problematic types of bags'
- Single-use plastic cups (hot cups, PLA and PE lined, including coffee cups, plastic drinking cups)
- Plastic lids of single-use coffee cups/plastic drinking cups
- Plastic balloons, balloon sticks, ties and accessories
- Plastic-stemmed cotton buds/plastic cotton bud sticks
- Plastic confetti
- Plastic pizza savers
- Thick plastic carry bags
- Disposable/single-use plastic bowls/plastic bowls
- Single-use plastic plates/plastic plates
- Single-use plastic food containers
- Plastic microbeads, that is in personal care, cosmetics and cleaning products
- Plastic fruit stickers
- Plastic sauce and condiment sachets (including soy sauce fish)
- Plastic beverage plugs
- Plastic bread tags
- Expanded polystyrene (EPS) trays, packaging and other expanded polystyrene consumer containers used for meat, fruit (produce) and retail items
- All EPS produce packaging
- Pre-packaged and attached plastic utensils/integrated packaging items, such as straws, cutlery, and so on.
- Plastic takeaway containers/single-use plastic food containers
- Plastic party supplies (not already included above)
- Ice bags
- Bait bags
- Non-biodegradable dog waste bags
- All other oxo-degradable plastics
- Cigarettes containing plastic filters
- Plastic cigarette filters/butts, Roll Your Own (tobacco) plastic filters

In the same timeframe, the following activities were recommended:

- A legislated ban on helium balloon releases
- EPR legislation on cigarette butts
- Improved disposal options for single-use masks

'We support the banning of all these listed items as soon as practical and certainly by 2023. Industry and business have been forewarned and have had time to prepare. These are required if the National Waste Plan targets for 2025 are to be achieved.'^{x89}

Products to be banned in Stage 4, no later than **March 2024** (if not addressed in the 2023 list, the following was recommended to be included in the 2024 one (or 'as soon as practicable')):

- Plastic balloon sticks, ties and accessories
- Plastic fruit stickers
- Plastic confetti
- Plastic pizza savers
- Plastic soy sauce fish
- Plastic beverage plugs
- Plastic bread tags
- Expanded polystyrene trays and other expanded polystyrene consumer containers
- Pre-packaged and attached plastic utensils

Products to be banned in Stage 5, no later than **March 2025**:

- Plastic fruit stickers
- Other EPS consumer food and beverage containers

*'With regards to the timing of additional products to be added to South Australia's ban, we would urge stages 3-5 to be implemented prior to their 'no later than' date, particularly where product bans are coming into force in other jurisdictions earlier.'*⁹⁰

*'We note South Australia's decision to align the banning of other EPS consumer containers with the national voluntary industry target of 2025, and for these to be included in South Australia's stage 5 (no later than March 2025). We believe these items should be included in stage 4.'*⁹¹

With many of the activities suggested by these stakeholders to occur as soon as possible and/or practicable, they included only 2 products in their suggestions for a proposed Stage 5 of prohibitions. This, it was thought, is the time to address other problems for considering in other ways to reduce pollution, aside from SA's SUP legislation.

*'The next big challenge in plastic waste management is plastic packaging, wrapping and cushioning materials in retail and wholesale products. Ideally, this should be addressed through Extended Producer Responsibility.'*⁹²

*'Plastic cigarette filters, including extended producer responsibility (EPR) legislation on cigarette butts and support for a national plan to address cigarette filters.'*⁹³

3.2.2.6 How long would businesses, industry and supply chains need to prepare?

It was mentioned that industry had received advance notice of these actions and should not require long lead times to prepare for change. While most of these stakeholders preferred a 'sooner rather than later' approach to implementing prohibition, they would prefer that bans were successful and well supported through the establishment/confirmation of appropriate resources, education, alternatives, and infrastructure before being activated.

*'(Integrated packaging) ... refers to plastic straws, stirrers and cutlery included in integrated packaging (dried noodles, drink poppers etc). The argument being that suppliers needed time to change and renew their stock. There has now been sufficient time and notice given to suppliers to switch their practices.'*⁹⁴

*'KESAB supports the banning of these items in timeframes that allow industry to source alternatives if/where needed.'*⁹⁵

One action to assist commercial operators with preparation for restrictions and prohibitions, it was suggested, was to announce the state's intentions as soon as possible, therefore allowing ample preparation time.

*'If announced before 1 March 2022, this would allow a full 12 months for businesses to make the transition.'*⁹⁶

It was acknowledged that the compostable/sustainable alternative to a (possibly) prohibited product exists and commercial operators would not require much time to prepare and adapt.

*'With hot and cold alternatives now available such as bagasse containers, it is possible to now progress with a phase out of plastic takeaway containers.'*⁹⁷

If action were to be taken to ban plastic cigarette filters and butts, the suggestion was to establish a Product Stewardship scheme to reduce the costs of clean-up, recycling/upcycling etc. and this would take longer preparation and implementation times.

3.2.2.7 Other items, actions, and suggestions by these respondents

- **Additional items for current/future consideration**

The following items and categories of items were put forward by various responding stakeholders, for additional consideration for inclusion in bans:

- Plastic soy sauce fish
- Plastic beverage plugs
- Plastic bread tags
- Cigarette butts/filters
- Plastic microbeads
- Plastic wrapping on magazines
- Rigid expanded and loose fill expanded polystyrene packaging
- Plastic corflute tree guards
- Helium balloon releases
- A greater range of plastic party products/items
- Improved disposal of single-use face masks
- Snack bags
- Confectionary wrappers
- Bottle tops
- Consumer education
- Balloons
- Lollipop sticks

- Fruit stickers
- Plastic confetti
- Plastic pizza savers
- Other expanded polystyrene consumer food and beverage containers
- Expanded polystyrene trays used for meat, fruit, and other items for retail sale/EPS products
- All problematic single-use plastics from retail sources
- Packaging used to transport goods and single-use plastic wrapping used in the transport of goods
- Plastic packaging (soft and rigid)
- Paper/plastic wipes containing microplastics
- Plastic product wrapping, for example polythene and cling film not required to prolong shelf life or food safety
- Plastic food decoration
- Any (plastic) bags, of any thickness (to be banned or banned from free supply to the public)
- All single-use carrier bags, including paper/calico bags (to promote avoidance of single-use)
- Plastic giveaway toys
- Product ties
- Neck rings
- Unnecessary double/secondary wrapping on putrescible/non-putrescible products
- Condiment sachets
- Bait bags
- Ice bags
- Dog waste bags

- **WA's effect on timeframes**

It was mentioned that Western Australia's ban on single-use plastic-lined cups will have come into effect by March 2023 and that this may enable South Australia to consider a similar timeline for prohibition.

- **Increase communications and support for behavioural change**

There was a recommendation that state government communications and support surrounding a ban on single-use plastic cups and lids would enhance behavioural change. This could raise awareness of and drive adoption of the reuse economy and support innovation. Other topics for education were also mentioned:

*'Consumers remain confused regarding the differences between compostable, biodegradable, degradable, and 'green'. This confusion is of course exploited by some manufacturers and leads to well-meaning consumers unintentionally doing the wrong this and contamination of waste streams.'*⁹⁸

*'Governments should be supporting and incentivising re-usable cups as an affordable and readily available alternative to disposable cups.'*⁹⁹

- **Helium balloon releases**

Government attention should turn to preventing helium balloon releases, specifically by improving litter legislation in all jurisdictions to remove confusion around the topic.

*'(Helium balloon release litter legislation) ... this does not send an adequately clear and consistent message to suppliers and members of the public, particularly noting that this item is one of the most lethal types of plastic debris to marine life.'*¹⁰⁰

*'Without an explicit ban, current application of litter laws is left open to interpretation and as such this act is rarely ever penalised.'*¹⁰¹

- **Hobart's effect on timelines**

Future consideration of banning plastic soy sauce fish in SA was recommended, particularly because these have been banned by by-law in Hobart (July 2021) and there is evidence of the introduction of viable alternatives in that area.

- **Plastic microbeads**

The topic of plastic microbeads has been discussed in WA and NSW, according to one stakeholder, and this requires addressing in SA for two reasons: to formally remove this pollutant from waterways and to align with those states.

*'These plastics have been subject to a voluntary phase-out since 2016, due to the potential harm caused when they are washed down drains and into the ocean. However, they are still regularly reported in cosmetic products found in many stores. With the Federal Government identifying microbeads as a priority plastic for phase out, we urge the SA Government to join NSW and WA in formalising a ban on microbeads.'*¹⁰²

- **Plastic magazine wrapping**

It was pointed out that phasing out plastic wrapping on magazines is being considered in Queensland and should also be replaced by home compostable wrap in SA.

*'As a soft plastic, it is highly lethal to wildlife... AMCS encourages the SA Government to join QD in banning this plastic, and to require compostable alternatives to meet Australia's home composting standards.'*¹⁰³

- **Loose-fill EPS packaging**

Similarly, phasing out rigid expanded, and loose fill expanded polystyrene (EPS) packaging is being considered in other jurisdictions and SA was encouraged to include these products too.

*'All expanded polystyrene poses a danger to ocean wildlife. Jurisdictions such as QLD and the ACT have now included these in proposals for second and third tranche plastic bans. We encourage the SA Government to support national harmonisation by also banning EPS of all kinds.'*¹⁰⁴

- **Plastic corflute tree guards**

Plastic corflute tree guards were mentioned because they are litter and problematic and are also being considered by Queensland.

‘Plastic corflute tree guards are costly to recover and often left in the environment where they slowly break down and blow away. Avoiding the use of tree planters, or only using fully compostable alternatives, also has the flow on effect of reducing the carbon footprint of tree planting as they do not need to be collected.’¹⁰⁵

- **Promoting ‘avoid’ policies**

Respondents outlined the need for the South Australian Government to further promote the highest tiers of the hierarchy – avoidance and reuse – as being an important accompanying issue to this discussion.

‘... greater use of ‘avoid’ rather than ‘replace’ as the most preferable action on the waste hierarchy and a circular economy’.¹⁰⁶

‘Ideally policy should aim to move away from a ‘throw-away’ culture.’¹⁰⁷

‘Key to this is consumer education about correct disposal methods as well as incentives for recycling.’¹⁰⁸

- **Employing litter measurement to identify problematic plastics**

The wider issues identified through litter measurements were also identified as an opportunity for the state government to work with stakeholders for solutions aimed at reducing waste and litter. This included mentions of the APCO 2021 Collective Impact Report, and the collaborative actions required to meet the Report’s targets.

‘Other prevalent items, such as snack bags, confectionery wrappers and bottle tops should also be addressed. ... More can be done including mandating recycled content in packaging or banning the use of plastic in these products... the state government could turn its attention to improving recycling and reducing litter of these items.’¹⁰⁹

‘Collective action by industry will be needed to meet these targets and will also be required across all parts of the waste industry including consumer education, building demand, infrastructure and financial incentives.’¹¹⁰

- **Extending SA’s Container Deposit Scheme to tackle plastics and other litter**

There was also a recommendation for extensions to the state’s Container Deposit Scheme (CDS) to increase the types of items recovered through the scheme, such as: wine and spirit bottles, bottle tops and larger fruit and juice containers.

- **Medical waste**

The prevalence of medical waste, particularly since the COVID-19 pandemic, also attracted attention for being increasingly problematic and requiring government intervention and state and federal steps towards resolution.

*'The sheer volumes of covid-19 related waste; literally billions of gloves, masks, syringes, shields and rapid antigen tests, and their impact on landfill and litter simply cannot be ignored even if dealt with separately.'*¹¹¹

*'Mask collection points, with appropriate and safe disposal now is required, particularly if masks remain in common practice.'*¹¹²

*'Rather than addressing this waste via bans, KESAB urges the state government separately to work collaboratively with the federal government towards national management of this waste... seeking the development of a federally funded National Pandemic Waste Management policy'*¹¹³

- **Smoking-related litter**

The topic of reducing litter from cigarette butts was mentioned as an issue for further consideration, if not by the state government, then by a nationally focused taskforce of comprising of subject matter experts. The South Australian Government was requested to participate in national discussions on the topic and support this reduction as much as possible as part of the state's commitment to banning single-use plastics.

*'Further engagement on this issue (cigarette butts) would be very welcome.'*¹¹⁴

This is a significant litter problem, necessitating many collaborative actions across Australia, at different levels, to resolve it.

'While Design for Environment (DfE) and EOL management are both key items, the key consideration if plastic cigarette butt filters continue to be sold in South Australia is how to take coordinated action on the reduction of littering.'

These actions would need to be based around:

- *State and local awareness campaigns; and*
 - *Smoking bans in public places; or*
- *Implementation of Designated Smoking Areas; and*
 - *Dedicated and adequate, infrastructure; and*
 - *Enforcement of littering and smoking laws; and*
 - *Programs to enable diversion from landfill; and*
- *Scaling abilities for the reuse of plastic cigarette butt filters.'*¹¹⁵

In addition to the filters, it was suggested that cigarette packets should be redesigned for sustainability.

*'Discussions should take place around requirements for sustainable packaging, including the foil insert and the plastic outer as well as the materials of the individual packet.'*¹¹⁶

- **Infrastructure development**

Concerns were expressed surrounding the lack of infrastructure to support a forecasted increase in compostable and recyclable items, requiring specific processing before they are recoverable.

*'But even putting waste in the correct bin does not currently guarantee that resources are diverted from landfill and environmentally conscious consumers are disheartened to hear that even after separating waste in some cases it is not recycled. Bin systems must be supported by infrastructure which ensure that those items are recycled at the highest level and with the greatest economic benefit.'*¹¹⁷

- **Dog waste**

Dog waste bags are a litter problem that, it was pointed out, is not being solved using compostable plastic bags (since people still litter these).

It was recommended that better solutions to this issue are developed, including the consideration of financial incentives to drive behavioural change around their use, disposal and littering.

*'Dog waste bags remain a litter problem when owners disregard litter regulations.'*¹¹⁸

- **Greenwashing**

Further education surrounding different materials and their descriptions (for example, compostable, biodegradable, degradable and green), manufacturing and labelling standards and the correct ways to dispose of each different material is required to improve consumer behaviour and reduce instances of greenwashing.

- **Developing reusable container use in SA**

A recommendation was made to establish a *'State Government initiative to examine the potential for further reusable container use in South Australia'*¹¹⁹

*'BYO cups are becoming more common and returnable containers for takeaway food are increasingly available. This initiative should examine how to better promote reusables, examine any impediments to uptake and then actively encourage more reusable container use. This would complement any actions taken on avoiding, reducing, or eliminating problem plastic items listed below.'*¹²⁰

- **Future policy action at state and national levels**

The South Australian Government was encouraged to extend development and policy actions to encompass a circular economy approach to plastics and packaging and to work towards a complementary national approach, including the following suggestions and activities:

- Standards for the use, content and labelling of reusable, compostable or recyclable packaging
- Progressive and consistent approaches to addressing problem plastics
- The removal of cigarette filters
- Expansion of the scope of the CDS
- Encouragement of additional options for avoidance and reduction, innovations, and reuse to reduce retailer-based plastic options
- Collection and recover options for post-consumer waste
- Extended Producer Responsibility for resource recovery
- Regulations to provide further legal protection and clarity for food service providers offering reusable container services
- Development of a Reusable Bag Standard
- Regulations for non-plastic products to be certified to the Australian compost standard
- A plan for phasing out commercially compostable (only) products
- Legislation preventing the release of helium balloons
- A national ban on plastic cigarette filters and/or Product Stewardship/EPR proposals for changing the responsibility for butt litter
- Pathways to moving Australia towards a smoke-free future
- Policies designed to increase avoidance of single-use behaviour and to reduce the materials, resources and energy, and so on, expended in the manufacture and recovery of these items, for example, minimum pricing (e.g. \$1) for reusable bags to deter frequent purchasing
- Initiative to examine the potential for further reusable container use in South Australia
- Regulations covering the definition and proof of genuinely 'reusable' products
- Regulations to specify the recycled content of thicker, heavyweight plastic bags
- Plans to phase out all plastic shopping bags and develop regulations to inform Australian standards for carrier bags
- Reporting requirements to track the usage of single-use and reusable bags at retailer levels/sites
- Regulations for using crates instead of plastic bags for home delivery shopping
- Implementing the Australian Litter Measure so that actionable KPIs can be established and tracked

3.2.3 FEEDBACK FROM WASTE AND RESOURCE RECOVERY ORGANISATIONS

Responses were received from the following waste and resource recovery stakeholders:

- East Waste
- Waste Management and Resource Recovery Association Australia (WMRR)

3.2.3.1 Should South Australia consider banning or restricting this product group?

The East Waste submission provided a detailed listing of suggested items and implementation times (refer Section 3.2.3.5 of this report). The following products were supported (or conditionally supported) for phase-out by WMRR:

- Single-use plastic cups (including coffee cups)
- Single-use plastic food containers
- Single-use plastic bowls
- Single-use plastic plates
- Plastic lids of single-use coffee cups
- Plastic balloon sticks
- Plastic balloon ties
- Plastic-stemmed cotton buds
- Plastic bags
- Other expanded polystyrene consumer food containers
- Expanded polystyrene trays used for meat, fruit, and other items for retail sale
- Microbeads in personal health and beauty products
- Plastic wrapping on magazines
- Plastic dome lids
- Loose EPS (such as polystyrene peanut style fill foam)
- Corflute tree guards

It was pointed out that the proposed plans for thicker-style plastic bags and plastic produce bags would require further review, to consider the realities of their use and the challenges of post-consumer processing.

‘(Thicker plastic bags) highlight that while in theory these types of bags appear to be a good candidate for a ban, this is not supported by WMRR because they are, on occasion, required for heavier and colder supermarket items (such as meat) and the more viable solution would be to transition to re-use models.’¹²¹

‘... realistic solutions must be found, particularly as the use of barrier/produce bags are part of a food business’ obligations in accordance with the Australia New Zealand Food Standards Code.... WMRR highlights that there are challenges posed by compostable packaging that cannot be ignored ... facilities often cannot distinguish between compostable and non-compostable packaging, posing a risk to the material stream. Notably, some jurisdictions (such as NSW) do not allow compostable packaging within the FOGO system given the risk it places on quality of output materials.’¹²²

WMRR did not support the phase-out of:

- fruit stickers
- plastic confetti
- plastic pizza savers
- plastic soy sauce fish
- plastic beverage plugs
- plastic bread tags.

The reason for this non-support (by WMRR at this time) for these items was because SA would become the only state to phase-out these items, resulting in national inconsistency, enforcement challenges and confusion. There were issues related to the realities of material recovery of alternative products, such as cardboard bread tags and the need for consumer education and behaviour change to enable processing and recycling.

‘Australia has already seen firsthand from Container Refund/Deposit Schemes the confusion and frustration that arise when these schemes are not coordinated, and there is an opportunity to avoid this challenge by ensuring from the outset that single-use bans are nationally consistent.’¹²³

‘WMRR does not support any SA-specific future ban on products that no other (or few) jurisdiction(s) in Australia or internationally has banned... even if there may currently be readily available alternatives.

WMRR agrees that these items should not be placed on shelves and should be designed out in the first instance, and while doing so would enable SA to remain a leader in this space... The SA government must consider whether the risk of national inconsistency (which comes with a range of challenges) is worth phasing out products that, from a volume perspective, are relatively insignificant, and could simply create confusion. Further, this will come with clear enforcement challenges, which requires resourcing...’¹²⁴

‘... some of the proposed alternatives may be technically recyclable but in reality, could cause issues at material recovery facilities if they are not properly collected...’¹²⁵

3.2.3.2 Are there viable alternatives, and if so, what are they?

While they mentioned a range of viable alternatives to SUPs, these waste industry respondents were in favour of creating behavioural change around the deployment of reusable items, in place of single-use products.

‘Reusable cups and lids should be widely promoted and supported as the preferred and safe option.... Where this is not possible, then the disposable takeaway options should be compostable.’¹²⁶

It was acknowledged that there are many viable alternatives to the problematic plastics under discussion, but it was also pointed out that not all of them are able to be processed at recovery and processing facilities in ways that secure desirable outputs and outcomes.

‘... e.g. Tip Top’s cardboard bread tag cannot be singularly disposed of in the yellow bin as they are too small to be picked up by MRFs.’¹²⁷

‘Although it is widely known that compostable packaging is commonly designed to break down, particularly in conditions found in industrial composting facilities, these facilities often cannot distinguish between compostable and non-compostable packaging, posing a risk of contamination of the material stream.’¹²⁸

In addition, replacing single-use items with more products designed for single-use (even though they are of sustainable materials) will not, it was pointed out, change consumer behaviour, and will perpetuate a throwaway mindset.

‘... caution must be shown around alternatives, including compostable and/or biodegradable plastics because even though they may be hypothetically viable alternatives, they can also be counter-productive in behavioural change and environmental outcomes...’¹²⁹

‘The RecycleMe and cold drink cups cannot be recycled through all South Australian-based Material Recycling Facilities as they contaminate the paper stream. Although (they) can be recycled through dedicated recycling bins, these are not readily accessible to the public and additional bin infrastructure and dedicated collections is problematic.’¹³⁰

The following table summarises these respondents’ suggestions for viable alternatives to (some of) the targeted single-use plastic items:

Single-use plastic item	Suggested viable alternative
Plastic cups/lids	- Reusable/returnable items - Recyclable cups/lids - Compostable cups/lids (preferred)
Plastic takeaway food containers	- Reusable/refillable containers - Compostable alternatives
Single-use plastic bowls	- Reusable/refillable containers - Compostable alternatives
Single-use plastic plates	- Compostable alternatives
Plastic lids of single-use coffee cups	- Certified compostable alternatives
Plastic bags (of all types)	- Many alternatives - Compostable bags
Plastic balloon sticks	- Cardboard holders - Wooden/bamboo sticks
Plastic balloon ties	- Cardboard/wood/bamboo
Balloons	- No identified alternative
Plastic stemmed cotton buds	- Reusable options - Bamboo alternatives (not recommended due to the time they take to fully compost)
Plastic beverage plugs	- Compostable lid alternatives with in-built stoppers
Plastic bread tags	- Cardboard

Single-use plastic item	Suggested viable alternative
EPS trays used for meat, fruit, and other items for retail sale	- Compostable trays - Recyclable rigid PET options - <i>Not recommended</i> are black plastic trays (due to MRF issues) and trays that have plastic film still attached
Fruit stickers	- Compostable options (certification required)
Plastic confetti	- Paper confetti
Plastic pizza savers	- Cardboard inserts - 'Dough balls' - These are recyclable if placed inside larger plastic bottles, along with lids and other small items
Plastic soy sauce fish	- Self-serve from refillable bottle at point of purchase

Table 11: Summary of suggested viable alternatives from the Waste and Resource Recovery submissions

3.2.3.3 What sort of exemptions, if any, may be needed?

Exemptions for items used for medical purposes were recommended, with the request that SA and all other jurisdictions collaborate nationally to minimise this form of non-recoverable waste and clearly define labelling, disposal pathways and ecosystem protection.

3.2.3.4 What are the health, economic, logistical, and social issues that should inform any decisions?

It was recommended that certified compostable alternatives should fit within recognised standards to ensure end-to-end viability, by adopting the following:

- Meeting Standards AS4736-2006
- Are accompanied by composting infrastructure
- Regulated by an appropriate output-quality regime
- Implementing a state-wide 3-bin system
- Establishing effective kerbside collection mechanisms
- Ongoing community education covering items and their correct disposal
- Setting a minimum standard on the quality/thickness of compostable lids for coffee cups (for efficacy and safety).

If a ban is not economically or socially viable in the short-to-medium term, the establishment of mandatory extended producer responsibility (EPR) programs was recommended to assist in the resolution of litter management, for example, cigarette butts, fishing gear.

*EPR returns moral and financial responsibility for potential hazards or harm to those who create it... it is the producers' responsibility to fund the collection, recycling and re-use of costs of these materials.*¹³¹

3.2.3.5 What sort of timeframes should be considered?

One of the 2 respondents in this category (East Waste) provided a detailed listing of suggested items and implementation times, which has been summarised below:

The respondents mentioned the following items to be banned in Stage 3, no later than **March 2023**:

- single-use plastic cups (including coffee cups)
- single-use plastic food containers
- single-use plastic bowls
- single-use plastic plates
- plastic lids of single-use coffee cups
- plastic bags (shopping and barrier/produce)
- EPS trays used for meat, fruit, and other items for retail sale
- black plastic recyclable rigid PET trays
- trays that can't be cleaned/prepared for recycling, for example meat juices, attached cling film
- other EPS consumer food and beverage containers.

'As there has been alternative options available for more than 13 years now, it is certainly time to fully 'ban the bag'.¹³²

Products to be banned in Stage 4, no later than **March 2024**:

- plastic balloon sticks
- plastic balloon ties
- balloon releases
- plastic stemmed cotton buds and alternatives that are not suitable/certified for commercial composting
- plastic beverage plugs
- plastic bread tags.

As a precursor to a ban in Stage 5, it was suggested that soy sauce fish are restricted during Stage 4 to facilitate vendor and consumer education and generate the development of viable alternatives.

Products to be banned in Stage 5, no later than **March 2025**:

- fruit stickers
- plastic confetti
- plastic pizza savers
- plastic soy sauce fish.

3.2.3.6 How long would businesses, industry and supply chains need to prepare?

A 12-month transition period was supported.

3.2.3.7 Other items, actions, and suggestions by these respondents

- **Increased public awareness and education is required**

Both respondents recommended that the public receives information to increase their awareness of, and education covering initiatives that set out to minimise litter and divert materials from landfill. In particular, respondents considered opportunities to inform and remind the community about:

- the benefits of reusable or returnable items vs single-use
- identification of items' material(s) and the correct ways to dispose of them
- identification of bins and the items they should receive
- compostable vs recyclable items.

*'A simple, consistent message that 'coffee cups are compostable' needs to be widely promoted without the confusion caused by recyclable coffee cups.'*¹³³

*'Promoting and accepting of reusable and refillable options should also be a priority.'*¹³⁴

- **Improved public infrastructure is required**

In South Australia's metropolitan areas there are trials for public collections of recycling items and green bins. Following these, additional infrastructure may be required to facilitate the correct disposal of waste requiring composting and/or recycling.

*'There also need to be green bins available in public places for people to dispose of them correctly.'*¹³⁵

3.2.4 FEEDBACK FROM THE BUSINESS AND INDUSTRY SECTOR

Responses were received from the following Business and Industry stakeholders:

- Australian Food and Grocery Council
- Australasian Bioplastics Association Incorporated
- Confidential submission 1
- Confidential submission 2
- Confidential submission 3
- Confidential submission 4
- Genfac Plastics
- Huhtamaki
- Little Green Panda Pty Ltd
- National Retail Association
- Phantm (Planet Positive)
- The Hygiene Co
- Trashd Pty Ltd.

Respondents welcomed the opportunity to be involved in this South Australian-focused consultation and offered pathways for future engagement and consultation on these matters.

*'We look forward to working with the Government to deliver the best environmental outcomes for South Australians, and welcome direct engagement soon.'*¹³⁶

There was frequent mention of the desire for South Australia to partner with other jurisdictions to develop a *'harmonised, nationwide approach (to reduce the impact of SUPs in the environment) with clear definitions and appropriate timeframes...'*¹³⁷

*'While the independence of the states allows governments to implement waste policy tailored to their state's needs and to initiate and stimulate national progress, it can also produce adverse impacts that ultimately produce commercial inefficiencies, undermine commercial confidence for circular economy stakeholders to invest, and reduce potential environmental gains.'*¹³⁸

In addition to the SUP legislation, prohibiting various single-use plastics, other policy, and systemic methods of reducing problematic plastics' availability and use were recommended. These, the government was advised, need to accompany efforts to ban SUPs.

*'... a sole reliance on these policy tools will not drive the deep systemic changes required to solve the pollution, public health and planetary health crises caused by plastics, and that there are a range of other policy initiatives that governments must also consider and which will play a critical role ...'*¹³⁹

One submission focused exclusively on the SUP Act but did not address any of the questions posed in the discussion paper. Instead, it discussed difficulties with the existing legislation and provided suggestions for updating elements of the Act and subordinate regulations.

3.2.4.1 Should South Australia consider banning or restricting this product group?

While most broadly agreed with the proposed ban/restrictions on the product group, it was requested that some categories of items and their alternatives received special/further consideration and attention, for example:

- the current lack of a suitable alternative to polymer-coated plates and bowls, requires 'special considerations' for these
- the focus should be on improving the reusability and recycled content of plastic bags to encourage reuse and support of the circular economy
- items which are deemed alternatives to SUPs but may prove to extract a health, safety, or environmental (HSE) cost elsewhere in its lifecycle
- removal of the terms '100% recyclable' and '100% compostable' in the legislation because this is not achievable due to inks, labels, dyes etc.
- recyclable items
- recycled (rPET) items
- subject to clarity of definitions and alignment with other jurisdictions
- sufficient logistics, supports and infrastructure to enable success.

*'... our support for the proposed bans is directly linked to the fact that the SA government has established an appropriate level and mix of resource recovery systems which now enable businesses to support bans with the confidence and flexibility necessary to implement a range of options for optimal environmental outcomes.'*¹⁴⁰

*'Banning recycled packaging like plastic cups and lids may have unintended consequences... a blanket ban which captures solutions like this risks undermining the broader policy drive toward resource circularity and may dissuade businesses from investing in similar circular economy packaging innovation.'*¹⁴¹

It was also recommended that further consultation occurs across the state's industry (particularly SME) sector to identify their concerns and information/education requirements so that future stages of prohibitions are anticipated, understood, and complied with.

*'We understand that no widespread business engagement was undertaken for Stage 2. This has been challenging, especially for SMEs ... the NRA has received multiple calls to our SUPs hotline about the Stage 2 ban and relayed these concerns directly to GISA.'*¹⁴²

There were numerous mentions of the need for any bans or restrictions to undergo thorough assessment, definitions and jurisdictional alignment before implementation or they risk (unintentional) non-compliance, and adverse economic, social, and environmental outcomes?

*'Predictable, transparent and consistent policy and decisions are vital to any regulatory regime such as this.'*¹⁴³

3.2.4.2 Are there viable alternatives, and if so, what are they?

While it was noted that there are alternatives to many of the items proposed for prohibition, it was also pointed out that there are some issues with the use of these, summarised as:

- printed paper plates require a polymer coating to protect food from ink contamination and consumers from spillage. It was suggested that SA follows other states’ exemptions for these plates and bowls (until a viable alternative is developed)
- replacing a plastic bag with one that cannot be responsibly disposed of, such as a fabric bag, was highlighted for creating negative environmental outcomes
- replacing a plastic bag with a paper one is problematic since the paper does not perform as well as plastic
- SA requires clear specifications and industry alignment before achieving its desired compostable bag performance and composting goals
- the entire lifespan of a substitute should be examined before considering its suitability. Examples were given where the alternative item was not plastic or single-use but may have been more environmentally-costly at other stages in its life, for example in production, transport, resource recovery, waste stream contamination, HSE, and so on
- biodegradable bags present challenges to recyclers and do not facilitate keeping material resources in use and circulating for as long as possible.

‘Alternatives for carrier bags are available but in some cases would not align with the objectives of the ban.’¹⁴⁴

‘... do not agree with mandating biodegradable or compostable solutions for checkout and produce bags – in line with the Federal Governments ‘National Plastics Plan 2021’ mandate that 80% or more of grocery packaging will require the ARL by Dec 2023...’¹⁴⁵

‘It is important that any proposed action on single-use plastic items does not result in a reduced net community and environmental benefit, such as where substitutes cause undesirable environmental outcomes, or where the lack of available fit for purpose substitutes may compromise the safety of the community.’¹⁴⁶

The following table summarises these respondents’ suggestions for viable alternatives to (some of) the targeted single-use plastic items:

Single-use plastic item	Suggested alternative
Single-use plastic cups (including coffee cups and lids)	<ul style="list-style-type: none"> - 100% recyclable cups/lids - Certified compostable (AS4736-2006 and/or AS5810-2010) - 100% recyclable PET, PP, PE or rPET - Clear PET or PLA for cold beverages - Anything that follows the waste hierarchy of genuinely reusable, recyclable, or compostable where appropriate - RecycleMe™ recyclable cups - Locally available fibrous residue - Paperboard cups with an aqueous coating

Single-use plastic item	Suggested alternative
Plastic lids on single-use cups (inc. coffee cup lids)	<ul style="list-style-type: none"> - PET, PLA (with aligned APCO product labelling to prevent consumer disposal errors) - PP hot cup lids - Paperboard - Bagasse/sugarcane - Locally available fibrous residue
Single-use plastic food containers	<ul style="list-style-type: none"> - 100% recyclable cups/lids - Certified compostable (AS4736-2006 and/or AS5810-2010) - Locally available fibrous residue
Plastic food containers, bowls, and plates	<ul style="list-style-type: none"> - Items readily recyclable according to PREP and the ARL or certified compostable to EN 13432, AS 4736, AS 5810 or ASTM D6400 - Locally available fibrous residue - Polypropylene (PP)
Polymer/plastic-lined paper plates and bowls	<ul style="list-style-type: none"> - Currently no viable alternative to meet stringent food safety requirements - Development of alternatives is underway (24 to 36 months) - Locally available fibrous residue - PHA
Lids for food containers, bowls, and plates	<ul style="list-style-type: none"> - PP or RPET/PET lids for recyclable paperboard containers - Recyclable paper lids - Compostable bagasse lid - Locally available fibrous residue
Plastic fruit and veg barrier bags	<ul style="list-style-type: none"> - Compostable barrier bags - Transparent paper materials - Flat paper bags used for produce in store, e.g. mushrooms
Plastic carry bags Thick plastic bags	<ul style="list-style-type: none"> - High recycled content bags, for example 70% to 80% - Bag for Good, non-woven polypropylene - Paper bags, 70% recycled content, FSC-certified paper - Paper 'self-opening satchel' (SOS) - Flat paper bags - Paper checkout bags - Polyester foldable/purse bags - Transparent paper materials - Any paper with a high recycled content
Plastic balloon ties	<ul style="list-style-type: none"> - Depends upon the final definition of 'ties' - Suppliers to be engaged for alternatives under development
Plastic balloon sticks	<ul style="list-style-type: none"> - Fibre-based balloon sticks
Fruit stickers	<ul style="list-style-type: none"> - Alternatives under investigation
Expanded polystyrene trays used for meat, fruit, and other items for retail sale	<ul style="list-style-type: none"> - Cardboard - PET trays - Locally available fibrous residue
Plastic-stemmed cotton buds	<ul style="list-style-type: none"> - Many have already been removed from shelves - Paper or fibre-based shafts - Reusable sticks with replaceable heads
Plastic pizza saver	<ul style="list-style-type: none"> - Upgrading to stronger boxes
Single-use plastic produce bags	<ul style="list-style-type: none"> - Certified compostable bags
Kitchen caddy liners	<ul style="list-style-type: none"> - Paper flat bags

Single-use plastic item	Suggested alternative
Single-use plastic wipes (wet wipes)	- Certified compostable wipes - Reusable wipes
Polymer(s)/organic polymers	- Uncertainty around this was mentioned frequently - PHA from organic waste

Table 12: Summary of suggestions for viable alternatives from Business and Industry submissions

3.2.4.3 What sort of exemptions, if any, may be needed?

The following exemptions were proposed by these stakeholders:

- **Polymer-coated paper plates and bowls:** owing to the need to employ this coating when printing on plates/bowls to protect food from inks and consumers from spillage. This was recommended to be in place until viable alternatives are approved (and allowed). The development and appearance of viable, safe alternatives is estimated to be 24 to 36 months. It was recommended that SA aligns with European Union Regulations on these items.
- **Recyclable items if excluded from the legislation:** for example paper cups, which could be available for closed loop environments .
- **Plastic plates, bowls, lids and containers if they are recyclable, recoverable or compostable:** mirroring the Qld and NSW regulations (including future items which will fit this purpose).
- **Plates, bowls, and lids that are demonstrably designed for reuse** (and cater to agreed Standards).
- **Plastic carrier bags, designed for reuse and made from recycled materials:** and contributing to plastics recycling circularity, such as 80% recycled content.
- **Transparent cups and lids:** are deemed important because they can show allergens, alcohol plimsoll lines, alcohol identification along with customer experience. These can also be deemed reusable.
- **Plastic ribbons:** if included in the definition of balloon ties, until a viable alternative is developed.
- **Plastic fruit stickers:** owing to the variety of purposes served by existing fruit stickers, it was preferred that they remain until a waste-free alternative is developed.
- **Plastic tags on produce:** such as bok choy, silver beet, potatoes.
- **Plastic stemmed cotton buds:** (single-use) were recommended for exemption for medical and forensic purposes.
- **Polymers:** binding fibrous residue which will compost under natural conditions.
- **Any/all products that will compost in natural conditions.**
- **Items and products which demonstrate better environmental performance than other alternatives:** for example, derived from sustainable forests which also absorb greenhouse gas emissions, fewer transport miles.
- **Items/products which offer traceability:** such as to prevent food contact cross contamination, improve sustainability and climate outcomes, prevent greenwashing.
- **Items/products that will prove to be resilient (e.g. supply) in the face of global disruptions:** such as pandemic-related transport delays and sanitisation requirements, raw material shortages, price increases and demand increases, and so on.

These (plastic produce tags) are sent through a wash cycle to remove soil and contamination, meaning cardboard tags would be unsuitable. They are

also used for bags of potatoes where cardboard tags are insufficient to manage the weight of larger bags.¹⁴⁷

'Retailers report that 2 to 5 per cent of customers regularly remember to bring their own suitable cup.'¹⁴⁸

'The study confirmed that the carbon footprint of cardboard boxes is much less than that of plastic boxes when moving tomatoes internationally.'¹⁴⁹

'Retailers are hesitant to place food or beverage products in packaging which is unclean or damaged as food safety is our paramount concern.'¹⁵⁰

'We note that bans which exclude recyclable plastic cups effectively reduce demand for, and value of, recycled content and limit circular economy outcomes.'¹⁵¹

3.2.4.4 What are the health, economic, logistical or social issues that should inform any decisions?

A wide range of these were proposed by this group of stakeholders and have been summarised below.

- **Longer term planning is welcomed by industry**

Respondents mentioned that the ability to plan longer-term is an opportunity to safeguard economic performance in these businesses and industries. GISA's 3-year+ approach offers this, and these respondents are keen to work with the government to extract that certainty.

'The NRA commends GISA for providing a clear and structured plan for the next 3 years as this will enable businesses to invest and prepare with more confidence, especially if greater national alignment is achieved.'¹⁵²

'We note that as a result of the WA ban on these reusable, recycled bags, an internationally renown soft plastic recycler has abandoned plans to build a recycling plant in Australia due to regulatory and market uncertainty.'¹⁵³

- **Seasonal tableware**

There were submissions which mentioned that many customers will be negatively impacted if seasonal plates and bowls are removed from sale. At present, these cannot be printed without polymer-coatings to protect food from ink and that this is a food safety issue.

- **Jurisdictional responsibilities and alignment**

Many of these respondents strongly supported a national focus on waste and SUP reduction, rather than a South Australian (only) based one and proposed that the environmental gains would be greater if SUP reduction activities were coordinated federally.

*'As AFGC member companies and the broad industry operate within national and often global supply chains, alignment across the jurisdictions is critical to providing brand owners with the scale necessary to drive optimal environmental outcomes. The AFGC therefore urges further single-use plastic activity being coordinated and driven at the federal level through the National Waste Policy and Action Plan and the Environment Ministers meeting.'*¹⁵⁴

*'It is simply impossible for businesses to deploy different products in different states, especially given the growth of online and cross-border trade even in small businesses.'*¹⁵⁵

A number of the items proposed in South Australia's discussion paper were considered to fall under national responsibility, so that restrictions may be aligned across the country (and internationally, where possible) and are easier to implement. Examples of these are:

- plastic bread tags (refer APCO National Packaging Targets and DAWE kerbside harmonisation project)
- EPS consumer food and beverage containers (refer APCO)
- EPS trays used for meat (refer APCO)
- plastic bags (refer National Shopping Bag Pact, EMM strategy)
- polymers (refer EU SUP Directive).

SA's good record of establishing a generally successful waste infrastructure and commitment to innovation and development of circular economy solutions was commended and recommended as the example for national alignment.

*'We encourage all jurisdictions to invest in fast-tracking similar resource recovery and circular economy strategies.'*¹⁵⁶

- **Impacts on disability and aged care consumers**

It was recommended that these communities are consulted prior to mandating the removal of pre-packaged and attached implements and items from food packs and during all other times when decisions may impact them.

*'The AFGC recommends GISA liaise directly with the manufacturers of specific packaging types to ensure environmentally superior substitutes are available and assess any potential negative impact on the disability or aged care community.'*¹⁵⁷

- **Potential health, safety and environmental (HSE) impacts created by banning single-use items**

Further consultation was proposed between GISA and industry members to assess health, safety, and environmental impacts of banning plastic cups and lids and other items.

*'Industry is highly supportive of sustainable initiatives but needs evidence-based information and consensus on viable and safe alternatives to turn good intentions into reality.'*¹⁵⁸

This topic sparked a wide range of responses and suggested issues to consider, which are summarised below.

- Do alternatives possess and guarantee the critical requirements of food and beverage packaging (as outlined at length in the response from the National Retail Association)? Is there a standard for 'approving' their use?
- What is the effect on general health and safety of the removal of polymer-lined cups/plates/bowls/packs, and so on, such as scalding risks, temperature-holding, shelf-life affects, spillage, contaminants.
- Will the friability of SUP alternatives result in increased wastage and cost imposts?
- Will bioplastics break down into microplastics and pollute the environment if not correctly composted?
- What is the effect of the use of genetically modified seeds when planting for bioplastic sources?
- What is the effect of competition for arable land between bioplastic crops and food crops?
- Will increases in paper composting affect the quality of the end product (compost) which is traditionally derived from organic feedstocks?
- Will a ban on one type of item increase the use of, or negative consequences/behaviour associated with the use of an alternative item, such as carbon emissions from transporting bottles and cans (higher) vs transporting pre-mix syrups (lower) or producing and recycling/composting fibre-based cups (possibly higher carbon footprint), formaldehyde use in bamboo products, methane impacts?
- Are there negative impacts of waste stream contamination, due to poor knowledge of correct disposal of substitutes?
- What is the effect on consumer safety if different hot food/beverage lids are used?
- The end-to-end effect on tree and paper fibre availability if different cups are used, such as numbers of trees used/saved during manufacture, resource recovery, chemicals used and emissions created during manufacture and reuse outcomes?
- What are the effects on the health care, aged care, and disability care sectors if plastic plates and bowls are removed or changed?

*'Therefore the health and wellbeing of the community can not be overlooked when making environmental decisions.'*¹⁵⁹

*'A recent LCA study conducted to ISO standards by Ramboll and peer reviewed by TÜV demonstrates that prioritising reuse is not the most sustainable choice.'*¹⁶⁰

*'Hot & cold cup lids are a low commodity product but one that is critical in providing users protection from ... cup contents when being consumed Government needs to ensure all viable alternatives are fit-for-purpose ... faulty packaging could significantly hurt someone.'*¹⁶¹

*'Similar to medicines and vitamins, Australians orally consume our food and beverage products and must be able to trust that they are safe.'*¹⁶²

*'Paper food packaging products ... are significantly heavier and therefore require more carbon emissions to produce and transport.'*¹⁶³

*'Currently over 2 million RecycleMe™ Cups have been successfully recycled into Hallmark Wrapping paper...'*¹⁶⁴

*'Replacing a non-compostable or non-recoverable single-use plastic with a certified compostable alternative that is no more recoverable than the item it replaces is perhaps not the most appropriate use of resources.'*¹⁶⁵

*'Plastic contamination is a huge issue in composting, both from plastic and fluorinated compounds which we know are in extremely high levels in moulded pulp bagasse/sugarcane packaging being used in Australia ... you are potentially increasing this issue for farmers.'*¹⁶⁶

- **The environmental impact of littered compostable items**

Litter is an issue that may not be remedied with these proposed prohibitions and, respondents advised, some compostable products require processing before degrading. When littered, these will cause environmental harm.

*'Compostable plastic bags pose the same environmental impact and risks that fossil fuel soft plastics do – someone who litters a plastic bag today will still litter a compostable plastic bag which ... have been proven to perform worse than traditional plastics in the marine environment.'*¹⁶⁷

- **Recycling improves greenhouse gas emissions**

An argument for increasing recycling of SUP alternatives items was that it will reduce potential greenhouse gas emissions, which are avoided vs waste-to-landfill pathways.

*'... more than 17 million tonnes of greenhouse gas emissions can be avoided in Australia through the increased recycling of high embodied energy materials like metals, paper, cardboard, glass, and plastics (avoiding the emissions associated with the extraction and processing of natural resources).'*¹⁶⁸

- **Infrastructure for removing putrescible waste**

There was a recommendation for investment into the removal of putrescible waste, such as food remnants on takeaway containers, to increase the recyclability of containers and improve resource recovery and returns.

*'This fraction (of food residue) can be readily removed from the plastics to ensure recyclability – though this may require additional investment by the waste and recycling sector.'*¹⁶⁹

- **Inbuilt policy/legislative flexibility is recommended**

The speed at which new alternatives, social change, and different ways of reducing plastics is being developed led to the recommendation for building-in flexibility to the legislative and policy approach to reducing SUPs. There were many requests for regular reviews of terms, definitions, inclusions, considerations, and so on so that innovation is encouraged and protected and that opportunities to build environmental and economic gains are fostered.

*'Fibre-based solutions already present in the market could replace at least 25% of current fossil-based plastic packaging by 2025 while offering the same functionalities. More and more innovative fibre-based products are brought to market every year, further increasing potential for substitution.'*¹⁷⁰

- **The COVID-19 pandemic**

There are many different and relevant effects of the pandemic on this discourse, stretching from manufacturing and supply chain disruptions through to shopping channels and on to point of purchase and post-consumer hygiene. Each of these stages along the way have posed challenges to the industry (and consumers' and regulators') plans to reduce SUPs in South Australia.

Many of these industry stakeholders mentioned specific challenges created by the pandemic (and responses to it) which spanned all four of the health, economic, logistical, or social issues to be taken into account when considering the future of SUPs and alternatives in South Australia. Examples of these are:

- supply chain disruptions and delays
- delivery costs
- overseas communications and manufacturing disruptions
- forward planning uncertainties
- hygiene and safety concerns/regulations challenging growth of 'reusable culture'
- hygiene and safety concerns/regulations promoting 'single-use' culture
- unfair or unsustainable advantage to some manufacturers/retailers over others
- jurisdictional/local lockdowns and border closures preventing stock movement
- workforce depletion due to illness/risk minimisation
- resource shortages/disruptions
- closure of testing labs
- diversion of sustainability teams to COVID-related challenges
- stretched/depleted/diverted delivery services.

- **Pressure on retail pricing and provider costs**

Respondents drew attention to retailers, who are expected (at present) to provide containers, cutlery, sauces, and bags at the point of purchase and if customers do not change their behaviour and expectations because of the proposed bans, this will result in additional costs to the supplying retailer. This customer expectation may be unsustainable, placing pressure on retail pricing (to recoup these expenses).

*'Retailers also report that less than 0.5% of customers bring their own utensils or food containers... non-plastic alternatives cost up to 10 times more and, beyond shopping bags, retailers have limited ability to charge separately for packaging items to cover their increased costs. Many will have no choice but to raise retail prices which will increase cost of living impacts especially in lower socioeconomic communities and regional communities.'*¹⁷¹

*'Many of the businesses impacted by the proposed bans – retail, food, hospitality and events – are those that have been most impacted by the COVID-19 pandemic.'*¹⁷²

*'Recyclable and compostable options are readily available today – however ongoing supply issues, price increases and freight delays need to be considered.'*¹⁷³

*'Increased costs and reduced sales will have flow-on effects to primary producers and farmers, as well as consumers.'*¹⁷⁴

It was pointed out that cost and implementation impacts will be reduced when South Australia transitions away from using problematic plastics.

*'... the Government will simply be providing the final additional push that industry need to switch to more sustainable packaging options. This is difficult for a single operator, but if the whole state shifts at once, no business is unfairly penalised.'*¹⁷⁵

- **End-to-end review of the effects of removing items from circulation**

It was recommended that, prior to banning items and introducing alternatives, governments should review the health and safety of humans, social and environmental effects of their decisions. This investigation and reflection should include the use of alternative items at all stages of their life cycles.

Plastic bags were the topic of one concern, where it was explained that their removal may result in less effective plastics recycling programs and place circular economy outcomes in jeopardy.

*'... the NPRS aims to enable the upcycling of pallet wrap and shrink wrap, to plastic bags then to an infinite loop of food grade packaging. Without plastic bags in circulation, collection capacity will be limited, hence reducing the landfill diversion and circularity of a high value resource.'*¹⁷⁶

- **Employment opportunities**

An argument in favour of permitting recyclable alternatives (vs only compostable) was to create opportunities for employment in SA. A Planet Ark study¹⁷⁷ was referred to, stating that the recycling of items creates employment opportunities for South Australians, many more than if waste were to be sent to landfill.

*'... the study (Planet Ark) noted for every 10,000 tonnes of materials recycled creates 9.2 jobs whilst if these materials were landfilled, it would create just 2.8 jobs.'*¹⁷⁸

The opportunity for increased employment and income diversification in the state's manufacturing sector and agricultural sector as raw materials for naturally compostable items are increasingly in demand, was also presented as a favourable outcome.

*'... we make from fibrous municipal green waste, agricultural residue, or coffee residue.'*¹⁷⁹

- **Employment loss**

On the other hand, if local manufacturing and recycling activities were to cease or reduce because of SUP bans and unaligned (national) legislation, opportunities for South Australian (and other states' and nations') jobs and businesses would be lost.

*'If the SA Government look to ban all single use coffee cups ... (local employers) ... will face significant risk of loss of sales, which will threaten the viability of SA based businesses and operations.'*¹⁸⁰

*'We would also need to look to locate our production facilities interstate, where the legislation is different... the result would be a direct loss of revenues and jobs for South Australia...'*¹⁸¹

- **Specifications, pricing, accessibility, and availability of alternative items**

There was mention of the challenges of working with relatively new and developing industry sectors, which is the case with many SUP alternatives. Comments were around the topics of pricing, accessibility and availability of items which may be used in place of banned and problematic SUPs and also securing protection for existing industry that will be impacted by the proposed bans.

The challenges to be addressed are summarised below.

- Clarity of definitions of acceptable alternatives and compliance with these definitions
- Testing and certification of acceptable alternatives
- Contingency plans/exemptions if supply chain disruptions prevent access to alternatives
- Viability of alternatives (and how to ensure it)
- Protection from monopolies/reduce competition
- Ensuring/supporting affordability of converting to alternatives, such as retooling, new labels, capital investment, retraining, and so on
- Supporting the ongoing viability of affected businesses, such as bubble tea and juice bars
- Supporting the ongoing viability of charities and non-profits who use SUP items to service their communities (sometimes necessarily)
- Demand outpacing supply, creating pressure on a limited number of global manufacturers and price increases for raw materials and finished products.

*'Industry are keen to support positive change and simply need adequate time, clear definitions, viable alternatives and relevant education to deliver results.'*¹⁸²

*'We assume the government was not aware of products such as ours when it drafted the Act, or does not mean to ban products which are 100% derived from plants and compostable in natural conditions.'*¹⁸³

*'There are only three to four primary PLA plastics producers globally (one of which produces greater than 50% of PLA supply globally), they control pricing and supply, competitive pricing is hard to achieve causing volatility in raw material prices (corn, sugar, and tapioca starch).'*¹⁸⁴

- **Increase in public access to recycling and/or compost/organic bins**

Implementing widespread access to recycling and organic waste bins (and education surrounding their use) was suggested as being an activity which should be conducted in partnership with the legislation to reduce SUPs. Without this access, we were told, non-SUP alternatives will be sent to landfill.

*'... there are very few recycling bins in public places ... public recycling and compost/organic bins should become mandated for all public places with well sign posted requirements of what can and can't be included in each bin.'*¹⁸⁵

3.2.4.5 What sort of timeframes should be considered?

There was concern around the timeframes proposed for the bans, given that the first regulations were unlikely to be finalised and passed until late 2022, leaving inadequate time for business and the broader community to comply with new regulations by March 2023. It was proposed that this intervention is deferred to September 1, 2023 (and subsequent years).

*'Though businesses may be aware of the proposed ban, they cannot act until regulations are finalised to prevent purchasing the wrong stock.'*¹⁸⁶

*'The NRA strongly recommends that the SA Government consider shifting enforcement dates to avoid the months surrounding seasonal holidays and peak retail periods such as Christmas and Easter. We propose 1 September become the new enforcement date each year moving forward.'*¹⁸⁷

The respondents mentioned the following items to be banned in Stage 3, no later than **March 2023**:

- plastic-stemmed cotton buds (also, refer NSW ban)
- plastic fruit and veg barrier bags (subject to supplies of alternative compostable materials)
- plastic balloon sticks
- plastic confetti
- plastic pizza savers.

Products to be banned in Stage 4, no later than **March 2024**:

- single-use plastic cups (including coffee cups and lids)
- single-use plastic food containers
- single-use plastic plates and bowls (including lids), (noting that challenges with polymer-coated items may require more time)
- plastic carry bags
- single-use plastic produce bags (or later if concerns are not resolved by this time)
- thick plastic bags (if they do not meet the National Shopping Bag Pact requirements, or later if concerns are not resolved by this time)
- EPS gelato containers.

Products to be banned in Stage 5, no later than **March 2025**:

- fruit and vegetable stickers (if viable alternatives are approved)
- plastic bread (only) tags (also included in the date to be confirmed list)
- other expanded polystyrene (EPS) consumer food and beverage containers
- expanded polystyrene trays used for meat, fruit, other food, and other items for retail sale (with support to smaller retailers)
- ceasing/end of the exemption for pre-packaged and attached products such as plastic cutlery and straws (if viable alternatives are approved)
- single-use plastic food containers (including lids).

Items with dates not specified (by some respondents) or were to be confirmed, following further investigation:

- plastic soy sauce fish
- plastic beverage plugs
- plastic confetti
- plastic pizza savers
- pre-packaged and attached plastic items (subject to further consultation with manufacturers)
- plastic balloon ties
- fruit and vegetable stickers
- plastic wipes (wet wipes).

*'Raw materials and the manufacturers exist now to offer fully compostable, certified replacements for plastic wipes in all wipe categories ... however the change is very slow simply because people choose plastic wipes as they are approximately 20% cheaper. We need Government to force the change.'*¹⁸⁸

It was requested that once a 3-stage plan is finalised, the South Australian Government commits to it and does not make significant changes to it thereafter, to provide industry with certainty for investment, development, training, systems, and so on.

3.2.4.6 How long would businesses, industry and supply chains need to prepare?

Once again, a great deal of feedback was provided by these stakeholders in response to this question and has been summarised below.

- **Concern over proposed timeframes**

Concern over timeframes was frequently mentioned in submissions and allowing sufficient time for industry to prepare for bans, and not suffer hardship from them, was recommended. The preferred timeframes varied between respondents, with the following examples:

*'A minimum of 12 months from passage of regulations to enforcement of Stage 3 is recommended.'*¹⁸⁹

*'In the event that the bans or phase out impact (organisation) and our product range, we believe we will require in the order for 2 years (24 months) to make changes to our production processes and supply chain/material sourcing.'*¹⁹⁰

*'No less than 18 months from announcement of the ban to enforcement.'*¹⁹¹

*'It's impossible for retailers to continue making sudden and unplanned changes every few months.'*¹⁹²

There were others who claimed they were ready for the supply of alternatives, if the proposed bans went ahead in March 2023, as proposed.

*'Utilising the ARL, recyclable options are readily available today with no additional infrastructure or education on disposal required.'*¹⁹³

- **Requests for extensions to the proposed timeframes**

It was requested that the dates for each proposed stage of the implementation of bans be moved to September annually (from March of each year), that is, Stage 3 proposed for 1 March 2023 moves to 1 September 2023, Stage 4 in September 2024 and so on. This, it was stated, will provide additional preparation lead time and avoid peak retail periods.

*'In our experience, inadequate notice and timeframes for SUP bans lead to rushed decisions, supply shortages, and increased risk of non-compliance.'*¹⁹⁴

- **Supply chain issues**

It was pointed out that many of these respondents were experiencing supply chain issues at the time of submitting their feedback and that these have extended planning, production, procurement, and inventory draw-down times considerably over the previous couple of years, and possibly, into the future. The request was for sufficient transitional time to be provided for all elements of supply chains to be able to receive and comply with new regulations.

*'Short lead times can create economic hardship for our business partners and potentially also product wastage where stock may have already been ordered and manufacturer.'*¹⁹⁵

*'While the advanced timeframes are appreciated. We note that industry generally has to await the final regulation wording before securing alternatives, reducing the time available if the published regulation is delayed. The sooner we can be certain of the regulation, the easier it will be to comply with the new SUP rules. This is heightened by the ongoing challenges in global supply chains.'*¹⁹⁶

*'Due to the increased demand on the PLA material globally, demand exceeds supply around 30% (2019-2020), and will take producers a minimum of 18-24 months to increase output.'*¹⁹⁷

- **Disruption to existing business process, procurement, and inventory plans**

In addition, many of these organisations work to extended lead times, with purchasing decisions made well in advance (for example, 12 to 24 months) of when items are available at point of purchase. These inventories will need sufficient draw-down times to ensure that manufacturers, wholesalers, and retailers are not penalised by bans, and to ensure that systems can be put in place to support the diversion (as far as possible) of excess products from landfill.

*'... affected stock draw-down is a lengthy process, with purchasing decisions made 12-months in advance, with some categories even longer...'*¹⁹⁸

*'The minimum timeframe for changes to retail products or packaging is usually between 9 to 15 months as it typically includes: research, design, testing, manufacture, shipping, distribution, retraining, promotion and exhausting old stock to prevent disposal.'*¹⁹⁹

- **Lack of clear information**

Another reason to slow down the pace of any bans and actions related to the reduction of SUPs is to enable decision makers to gather more information from manufacturers and suppliers about alternatives and solutions in the pipeline.

*'... research and development work is underway on alternatives, they will not be widely available for some time. We encourage all governments to engage directly with industry and suppliers to better understand the market.'*²⁰⁰

*'(Confidential submission) supports the proposed ban on single-use items in South Australia where sustainable alternatives are readily available. This is subject to businesses being provided with sufficient time to prepare for the proposed bans and where possible, the products and definitions listed being aligned with legislation implemented in other states and territories.'*²⁰¹

*'There are trials underway to sort (withheld: commercial in confidence) at the MRF which we are running.'*²⁰²

- **Proof of efficacy of (some) alternatives is still required**

Manufacturers of alternative products will require additional time to develop and test stock before offering for sale to retailers, which (we were told) may be an additional 6 to 12 months.

If manufacturers need to confirm standards and gain certification, again more notice/time will be needed.

*'... and does not include the time taken to receive Australian composting certifications (average 12 months).'*²⁰³

3.2.4.7 Other items, actions, and suggestions by these respondents

In addition to responding directly to the questions posed in the discussion paper, many stakeholders employed this consultation to draw attention to related and other matters of significance to their businesses and associations. These have been summarised below.

- **Additional items/activities recommended for inclusion**

Some respondents suggested additional items and activities to also be considered for prohibition. These have been summarised below.

- **Plastic balloon releases:** recommended that SA follows WA's ban on balloon releases, while not banning the sale or purchase of balloons.
- **Plastic wipes (wet wipes):** owing to their significant presence in waste audits.
- **Black plastic food takeaway containers:** are problematic to recycle owing to the challenges experienced by optical scanners at MRFs.
- **Additive fragmentable technologies:** these products lead to the creation of microplastics.

'Wipes, one of the hidden Single use plastics are the equivalent in plastic landfill to over half the coffee cups sold in Australia including the lids! That's almost 20 times the plastic waste of straws'²⁰⁴

'... this is insufficient and all additive fragmentable technologies should be banned as these products simply lead to fragmentation which create microplastics that persist in the environment with well known consequences. These would include landfill biodegradable, enzyme mediated and any other materials that cannot meet the requirements of the Australian Standards AS 4736 and AS 5810.'²⁰⁵

'The use of black plastic (dye) does not offer any benefits to the final product, other than an emotional/consumer perception that it is a superior product... institute a ban/phase-out out for this sub-product range if the waste and recycling industry is unable to develop the requisite technology to effectively sort this waste component.'²⁰⁶

- **Industry awareness and education strategies**

It will be imperative that industry members are provided with adequate information and education to ensure the success of the proposed bans.

'... thousands of retail business owners and their staff are at the coalface of any legislation impacting customers and must be provided comprehensive support.'²⁰⁷

The following factors should be taken into to account when developing and delivering this support:

- the size of the audience and their locations, such as thousands in workforces, all around SA metro and regional
- Culturally And Linguistically Diverse (CALD) communities
- charitable and not-for-profit (NFP) organisations
- people and businesses who are unaware that bans apply to them and/or to their workplaces or are unaware of the bans at all
- businesses unable to afford increased costs
- businesses experiencing a lack of access to alternatives
- individuals who may present a backlash/resent the inconvenience and cost
- those lacking understanding of what items go into which bins/waste streams
- the lack of widespread understanding of labelling and standards (current and future).

*'In our experience, citizens express strong support for sustainability initiatives but fail to realise the practical and sometimes inconvenient changes they will need to undertake, including potential increases in cost.'*²⁰⁸

- **Opportunities for leadership and innovation in reducing SUPs**

There were calls for government to provide support for other ways of encouraging leadership and innovation in reducing SUPs, in addition to bans.

A summary of these suggestions²⁰⁹ follows:

- funding for innovative closed-loop or recycling business models
- research and innovation grants to provide sustainable solutions to problematic products
- retailer collaborations to trial and develop sustainable solutions
- initiatives to increase domestic recycled content
- establishment of domestic testing facilities for Australian certification
- public space FOGO and recycling bins
- littering enforcement
- consumer education campaign support
- jurisdictional alignment and collaboration
- SA Government recommits to the agreed EMM strategy and endorse the National Shopping Bag Pact
- supporting ways to help consumers to remember their bags, for example encouraging cost increases for purchasing shopping bags at point of sale or providing discounts when bringing one's own
- upgrading of recycling infrastructure.

- **Other suggested policy initiatives for government(s)**

It was stated that SUP legislation alone will not resolve all the issues created by plastics and therefore government(s) also need to develop other ways to achieve a 'plastic-free planet'²¹⁰. The following summarises these suggestions:

- supporting innovation to reduce plastics and microplastics in use and in the environment
- fostering development of alternatives to fossil fuel-derived plastics
- replacing plastic feedstocks when reductions are successful
- investing in recycling and composting infrastructure and reducing the negative environmental effects of waste
- regulating and monitoring misleading claims, greenwashing, and non-compliance to recognised Standards/certifications
- reviewing policy and actions from both sides of the demand and supply viewpoints, for example learning from approaches to reduce tobacco consumption
- reducing food waste
- educate consumers on the terms and actions required to describe and avoid, reuse, employ and recycle plastics
- dissuading suppliers from employing Australia as a dumping ground for items that other countries won't take.

'Policy makers and decision-makers must approach the plastics crisis as a systemic challenge ... and be encouraged to do more than take piecemeal action.

The systems that will help solve the plastic crisis must include establishing an enabling policy framework that encourages innovation and the emergence of biobased, biodegradable, and compostable natural materials that can replace non-renewable feedstocks.²¹¹

- **Aiding consumer preparation for bans and behaviour change**

It was acknowledged that consumers need time to prepare for bans too. In this period, they will require support to learn about the bans and the actions required by them to comply, to select and adopt new items, and change attitudes and behaviour.

'We cannot place (or pour) a coffee, smoothie, curry, salad or sauce directly into a customer's hands if they have forgotten their reusable packaging.'²¹²

'More work needs to be done to improve processes and consumer behaviour before reusable models are viable.'²¹³

'... the NRA are concerned that most consumers incorrectly believe that 'all plant-based' or compostable plastics are harmless in the environment... they do not biodegrade if littered and have the potential for harm to wildlife as other plastics and could potentially increase littering ... more needs to be done to dispel dangerous myths, educate the public in waste hierarchy and circular economy principles, and address confusing product and disposal descriptions.'²¹⁴

Retailers are of the belief that unless consumers' expectations and behaviour changes significantly, it will be up to retailers to provide containers at point of purchase to their customers.

'They are often expected to be provided by retailers at no additional cost.'²¹⁵

It was submitted that South Australian consumers have proven they are capable of changes to their waste-related behaviour with the benefit of education and learning support, as evidenced by the results of the 2009 lightweight plastic bag ban, Stages 1 and 2 of the SUP legislation and at recent events like the Adelaide Fringe.

'The Fringe in their eatery section do waste separation very well and prove that consumer behaviour can change with direction and education.'²¹⁶

In some cases, it was also pointed out, behaviours changed but did not provide the desired outcomes.

'... we have some hesitancy about recommending a standard that sees 'thickening' as the solution as this may, like it did with plastic bags from retailers/supermarkets, lead to stronger bags being produced (using more resources) and still being disposed of after a single use.'²¹⁷

- **Clarification of scope, descriptions, parameters, and terms employed**

Respondents sought clarification on scope, terms, parameters, enforcement, and descriptions employed in the discussion paper and their requests have been summarised below:

- Clarification of whether the scope of this consultation and the actions following it are within the SUP legislation and activities and/or that of the APCO National Packaging Targets, to avoid any conflict or confusion between the two.
- Scope of deliberations surrounding a 'cup' and its definition, for example, beyond beverages and including a variety of packaging such as soups, noodles, desserts.
- Definitions surrounding 'single-use plastic food containers and lids'.
- More detail on 'SUP food containers', including a definition and how 'single-use' is determined.
- Further definition of a balloon 'tie', which may include ribbons that have many other purposes, such as gift wrap, crafts, string.
- What qualifies as 'confetti' and in what application? Possible examples are foil, glitter, sequins, streamers and used in many applications, including that which is affixing to other items.
- Manufacturing specifications and parameters for alternatives to SUPs, for example 'a number of dishwasher cycles to determine reusability like the British Dishwashing Standard'²¹⁸.
- Developing standards around the term 'reusable', preferably that align with international specifications and apply to all materials, not confined to plastic.
- Realistically defining (via the legislation) the extent of the terms 'recyclable' and 'compostable', where it has been pointed out that neither are '100%' achievable (and changing the legislation to reflect this).
- Employment of labels and certification trust marks so that these are understood and accepted by all stakeholders.
- Definition of the word 'polymer' and 'organic polymers' in the legislation and clarification surrounding their use, given that new technologies and methods are changing previous understanding of the styles and uses of these.
- Definition of the requirements of a 'design' and 'intention' assessment.
- Definitions of relevant supply channels as referred to in the Act.
- Definitions of 'single-use' and 'reusable' and relating to the manner in which the product's original use or intention for this is proven.
- Ways in which suppliers can conduct self-assessment of products' compliance with the SUP Act.

*'Retailers are eager to phase out single-use, unnecessary and problematic packaging and primarily need clear definitions, consistent rules and adequate time to deliver.'*²¹⁹

*'It is therefore important that the South Australian Government develops clear standards, perhaps in terms of thickness, durability or other attributes that allow these to be differentiated from what are currently clearly intended to (be) 'single use' alternative.'*²²⁰

*'... such as the definition of the term 'polymer' and make clear that any restrictions do not apply to products which are compostable in natural conditions.'*²²¹

*'Subjectively applied enforcement guidelines provided after or close to the ban are not acceptable as industry need to order millions of dollars of stock with certainty ... varying rules per item increase confusion and non-compliance risk especially for ... (CALD) businesses.'*²²²

It was also requested that developing scope, descriptions, parameters, terms and guidelines reaches beyond SA's interpretations and focuses upon ways to achieve national (and international) collaboration and agreement.

*'Confetti is also used across multiple categories, including partyware, clothing, accessories, gift cards, toys and inflatables (and) loose confetti, ... attached or integral to the product itself.'*²²³

*'We urge government to consider more evidence-based guidelines and that these guidelines be provided at passage of regulations rather than after the ban was in effect when businesses have already purchased the stock, as in the case of Stage 1.'*²²⁴

*'... we urge all jurisdictions to align on the scope of products and definitions (and if possible, timings) to ensure the bans are not ambiguous so industry can respond with confidence and fast track delivery of the environmental aims.'*²²⁵

*'We recommend any items of consumer packaging should be excluded from the scope of items to ensure there is no conflict or ambiguity with the National Packaging Targets ... the following items should be managed by APCO ... as they are packaging not plastic items:
Plastic bread tags
Expanded polystyrene consumer food and beverage containers
Expanded polystyrene trays used for meat.'*²²⁶

- **Clarification of other actions**

Respondents asked for more information on a variety of topics, and these have been summarised below.

- SA's plans to introduce public place food organics and garden organics (FOGO) bins
- Whether packaging is part of the South Australian government's single-use plastics related activities or not (preferably not)
- Which jurisdictions will be affected by future SUP-related activities
- End-to-end lifecycles of alternative items
- Whether all aspects of the effects of banning single-use plastic produce bags have been investigated to ensure other pathways to avoiding, reusing, and recycling have been investigated. This also includes consideration of the effects of introducing compostable bags
- The increased carbon impacts of using alternatives to SUPs, such as paper bags
- The results of, and actions proposed by, the 'landmark pulpability trials (APCO) and the Commonwealth Government'²²⁷ which is leading to findings of plastic-lined cups being recyclable
- The SA Government's intentions to collaborate with other state, federal and international bodies also working on the reduction of SUPs and litter, and so on

- Which labelling types, styles and standards will be adopted in SA and other jurisdictions
- Testing the validity of EPA assessments of products and the guidelines under which they are taken

- **Enforcement**

SA's enforcement of previous stages of the SUP bans was mentioned for not being proactive and it was recommended that this is increased, to mirror the activities of other jurisdictions. It was also requested that the Act provides a mechanism for appealing EPA determinations.

*'We strongly advise more proactive strategies (as deployed in other jurisdictions) to enable anonymous reporting (such as an online form) and widespread random spot-checking of businesses.'*²²⁸

*'The SUP Act should provide a right of appeal from EPA determinations'*²²⁹

It was requested that enforcement is applied transparently and equally across all sectors and businesses, including items offered for sale or supply from interstate, international and online channels to underpin and support the efforts of local business.

*'Where products are assessed by the Environment Protection Authority (EPA) and a determination made about whether or not they are 'prohibited plastic products' the EPA should provide written reasons of the basis of its determination to the relevant supplier or distributor'*²³⁰

If a supplier or retailer is found to be in contravention of the SUP Act, there was a request for arrangements to be made to enable them to sell existing stocks until the determination/revision is enforced.

*'If (supplier) is not permitted to sell existing stocks of its products in South Australia, it will incur commercial losses.'*²³¹

It was recommended that action is taken against manufacturers or suppliers who make false or misleading claims about their products, *'such as bioplastics labelled 'plastic free'*.²³²

The topic of enforcement is a broad one and applies to definitions, expectations, and compliance all the way along a product's lifecycle. It was recommended that this spectrum is investigated further, and findings employed to ensure that all opportunities to ensure the best possible use of resources occurs at all stages.

*'A reusable plastic cup should be used at least 20 times to minimise climate impacts. If the paper cup is recycled afterwards, the break-even point increases to 36 times. In the case of reusable cups made of steel, these need to be used at least 130 times to cause fewer CO² emissions than a take-away paper cup. In reality, such high levels of reuse are not achieved.'*²³³

'If a reusable system is to be implemented, the legislative framework shall define the same level of requirements as the ones that are applied to recycling. Following this logic, reuse scheme should actually be in place and capable of demonstrating their traceability based on a robust measurement methods and calculation rules. We believe such a framework would be

*necessary to verify actually how many times a packaging has been reused and to avoid greenwashing.*²³⁴

- **Support for, and credit to, organisations and consumers who have led reform**

Governments and other bodies should be supporting and giving due credit to the organisations and people who have voluntarily commenced reform activities at their own expense and resourcing. There were many examples of this in the responses and it was recommended that these individuals and businesses are recognised for this.

*'For many years, retailers have been proactive in various environmental initiatives, investing heavily in innovation, making alternatives available, promoting reusable alternatives, and providing in-store recycling.'*²³⁵

*'We recommend that any policy settings and signals developed encourage and reward industry and consumers for pursuing more sustainable choices.'*²³⁶

Government(s) were urged to support the strategies and initiatives taken by these organisations, adding to their efforts rather than duplicating or contradicting them. Examples of these activities were given as:

- Australian Packaging Covenant
- National Packaging Targets
- Partnering with environmental bodies such as Ellen MacArthur Foundation, Planet Ark, Good Environmental Choice Australia, Stop Food waste Australia, Wrap UK
- ANZPAC Plastic Pact
- National Shopping Bag Pact
- Remade in Australia
- The Australasian Recycling Label
- Harmonisation of kerbside standards
- Product Stewardship schemes.

*'NRA members are actively pursuing sustainability across packaging, food, waste, emissions, carbon-neutral targets, solar power and other areas. National brands are committed to whole-of-life solutions and our customers place high expectations on our businesses to be honest and verified with claims of sustainability.'*²³⁷

- **Verification and labelling**

The additional costs of verification and labelling were mentioned, along with the need for recognised standards to be applied to the processes of verifying and labelling compliant alternative materials and products. Preference was given to the adoption of a nationally recognised set of standards with which all manufacturers, wholesalers and retailers should comply.

*'It will be essential to use well-established, nationally-recognised certifications and labelling to verify items and ensure a high and consistent standard is set.'*²³⁸

Those nationally recognised standards referenced in submissions were as follows:

- The Australasian Recycling Logo (ARL)
- The Australian Standard for Home Composting AS 5810-2010
- The Australian Standard for Industrial Composting AS 4736-2006
- ISO 23517 International Standard for soil degradable mulch films for agricultural applications
- New Plastics Economy Initiatives developed by the Ellen MacArthur Foundation
- Circular economy principles
- AORA National Policies
- Australian Packaging Covenant
- Voluntary verification program(s), such as Australasian Bioplastics Association's (ABA's) program for bioplastic agricultural films
- *Plastic Reduction Act 2021* (ACT)
- *The Environmental Protection Act 1993*

*'... as noted in the proposed legislation, correct on-pack labelling needs to be utilised for consumers to correctly dispose of their used packaging.'*²³⁹

- **Legislative (wording) changes requested**

There were multiple requests for legislative (and those applied in other channels') terms to be further defined (and possibly, changed) as a result of this discussion and the intervening time since the writing of South Australia's *Single-use and Other Plastic Products (Waste Avoidance) Act 2020* (SUP Act).

One respondent requested that the South Australian Single Use Plastics legislation was adjusted to remove the '100%' precursor to '100% recyclable' and '100% compostable' to describe a product classification because (it was argued) nothing is 100% recyclable or compostable, owing to the small percentage (<5%) of by-products following processing, such as dyes, inks, humus.

*'The classification of '100% Recyclable' needs to be adjusted to remove '100%' in the legislation. This statement is misleading and is impossible for any item to be truly '100% Recyclable' due to inks, labels, glues, dyes etc. The legislation should align with the ARL & PREP in addition to the soon to be released APCO Repulpability Standard for fibre-based packaging.'*²⁴⁰

*'The definitions of 'plastic' and 'single use' in the SUP Act should be amended so that there is greater clarity for businesses about what constitutes a 'prohibited plastic product.'*²⁴¹

*The same principle in relation to something being '100% compostable' also applies...*²⁴²

*'The SUP Act does not refer to compostable plastics and/or whether any compostable standards or certification of biodegradability will be sufficient to exempt a product from the definition of a 'prohibited plastic product'.'*²⁴³

- **Investigation of other uses for plastic waste**

One respondent produces ‘engine-ready fuels such as diesel and kerosene’ from ‘unrecyclable’ mixed plastic waste²⁴⁴ and suggested that the state government investigates this (and other offerings) to resolve the problems currently experienced when sending plastic waste to landfill, along with meeting fuel access and reserve targets.

‘It also provides the opportunity now... to do something about the plastic waste problem, post-consumer.’²⁴⁵

This recycling of plastics, they suggested, could be explored for resolving current waste problems and those which may emerge, or continue into the future, such as exempted medical waste and the international issue of plastic waste in oceans.

APPENDIX

Appendix 1: GISA Questionnaire

The following lists the questions and images deployed in the online surveys.

Q. About you (confidential)

Name
Address
Suburb
State
Postal Code
Email Address

Q. Do you support intervention to address environmental problems from single-use plastic products like bags and takeaway coffee cups?

Yes
No
Unsure
Comments

Q. Should any of the single-use items below be prohibited, or replaced with recyclable or compostable or reusable alternatives?

Select single-use plastic items you think should be prohibited:



Plastic bags



Single-use plastic beverage cups



Single-use plastic beverage cup lids



Single-use plastic bowls and containers



Plastic balloon ties and balloon sticks



Plastic stemmed cotton buds



Plastic fruit stickers



Plastic soy sauce fish



Plastic beverage plugs



Plastic bread tags



Polystyrene meat trays



Single-serve pre-packaged products and attached items made from plastic



Pizza 'savers'



Plastic confetti

None of the above

Q. Are there any other items you think should be prohibited?

Q. Do you think any of these single-use plastics that might require an exemption?

Yes

No

Not sure

Q. Reusable items are still the best choice for the environment, but not all single-use items can easily be replaced by reusable. If an item is going to be 'single-use' do you have a preference for the kind of alternatives we should consider?

What alternatives to single-use plastic do you prefer?

Only certified compostable alternatives that can go in a green bin

Only recyclable alternatives that can go in a yellow bin

Either compostable or recyclable alternatives

Undecided/don't know

Q. The future of Single-use plastic bags

South Australia already has a ban on certain lightweight single-use shopping bags. What else could we do to reduce the impact of single-use plastic bags from supermarkets, department stores and shops?

Q. Should all shopping bags be certified compostable only?

Yes

No

Not sure/undecided

Q. Should all fruit and vegetable bags certified compostable only?

Yes

No

Not sure/undecided

Q. Do you recycle your food waste in your green bin using a compostable bag and kitchen 'caddy'?

Yes, always

Often

Rarely

No, never

Comments

Q. Would you be prepared to choose a reusable product for food and beverages (cups and containers) ?

Yes, but only if the cost was the same as single-use items

Yes, even if the cost was higher than single-use items

No, it's too hard to carry reusable cups and containers everywhere

Not sure/undecided

Q. Anything else you want to add?

We'd like to hear any other opinions you have on single-use plastic. Do you have any further comments on the future of single-use plastic items in South Australia?

References and End Notes

- ¹ YourSAy respondent #18
- ² YourSAy respondent #10
- ³ GISA survey respondent
- ⁴ General population survey respondent
- ⁵ GISA survey respondent
- ⁶ General population survey respondent
- ⁷ GISA survey respondent
- ⁸ GISA survey respondent
- ⁹ GISA survey respondent
- ¹⁰ GISA survey respondent
- ¹¹ GISA survey respondent
- ¹² GISA survey respondent
- ¹³ GISA survey respondent
- ¹⁴ General population survey respondent
- ¹⁵ YourSAy comment #03
- ¹⁶ YourSAy comment #13
- ¹⁷ YourSAy comment #18
- ¹⁸ YourSAy comment #04
- ¹⁹ YourSAy comment #10
- ²⁰ YourSAy comment #11
- ²¹ YourSAy comment #04
- ²² YourSAy comment #09
- ²³ YourSAy comment #17
- ²⁴ YourSAy comment #06
- ²⁵ YourSAy comment #09
- ²⁶ YourSAy comment #09
- ²⁷ YourSAy comment #05
- ²⁸ YourSAy comment #06
- ²⁹ YourSAy comment #09
- ³⁰ YourSAy comment #17
- ³¹ YourSAy comment #04
- ³² YourSAy comment #06
- ³³ YourSAy comment #06
- ³⁴ YourSAy comment #17
- ³⁵ YourSAy comment #18
- ³⁶ Adelaide Hills Council
- ³⁷ City of Norwood Payneham & St Peters
- ³⁸ Adelaide Hills Council
- ³⁹ City of Burnside
- ⁴⁰ City of Holdfast Bay
- ⁴¹ City of Holdfast Bay
- ⁴² City of Burnside
- ⁴³ City of Holdfast Bay
- ⁴⁴ City of Burnside
- ⁴⁵ City of Burnside
- ⁴⁶ City of Marion
- ⁴⁷ Adelaide Hills Council
- ⁴⁸ City of Holdfast Bay
- ⁴⁹ City of Norwood Payneham & St Peters
- ⁵⁰ City of Marion
- ⁵¹ City of Norwood Payneham & St Peters

- 52 City of Marion
- 53 City of Norwood Payneham & St Peters
- 54 City of Burnside
- 55 City of Mitcham
- 56 City of Mitcham
- 57 City of Burnside
- 58 City of Marion
- 59 City of Marion
- 60 City of Burnside
- 61 City of Holdfast Bay
- 62 City of Marion
- 63 City of Marion
- 64 Green Adelaide
- 65 City of Norwood Payneham & St Peters
- 66 City of Victor Harbor
- 67 City of Norwood Payneham & St Peters
- 68 City of Holdfast Bay
- 69 City of Marion
- 70 City of Marion
- 71 City of Holdfast Bay
- 72 Green Adelaide
- 73 City of Norwood Payneham & St Peters
- 74 Green Adelaide
- 75 Green Adelaide
- 76 Australian Marine Conservation Society
- 77 Conservation Council SA
- 78 KESAB Environmental Solutions
- 79 Boomerang Alliance
- 80 Boomerang Alliance
- 81 KESAB Environmental Solutions
- 82 Australian Marine Conservation Society
- 83 KESAB Environmental Solutions
- 84 Australian Marine Conservation Society
- 85 Australian Marine Conservation Society
- 86 KESAB Environmental Solutions
- 87 KESAB Environmental Solutions
- 88 KESAB Environmental Solutions
- 89 Boomerang Alliance
- 90 WWF
- 91 WWF
- 92 Conservation Council SA
- 93 Conservation Council SA
- 94 Boomerang Alliance
- 95 KESAB Environmental Solutions
- 96 Australian Marine Conservation Society
- 97 Australian Marine Conservation Society
- 98 KESAB Environmental Solutions
- 99 WWF
- 100 WWF
- 101 Australian Marine Conservation Society
- 102 Australian Marine Conservation Society
- 103 Australian Marine Conservation Society
- 104 Australian Marine Conservation Society
- 105 Australian Marine Conservation Society

106 KESAB Environmental Solutions
107 KESAB Environmental Solutions
108 KESAB Environmental Solutions
109 KESAB Environmental Solutions
110 KESAB Environmental Solutions
111 KESAB Environmental Solutions
112 Boomerang Alliance
113 KESAB Environmental Solutions
114 WWF
115 No More Butts
116 No More Butts
117 KESAB Environmental Solutions
118 Boomerang Alliance
119 Boomerang Alliance
120 Boomerang Alliance
121 Waste Management & Resource Recovery Association Australia (WMRR)
122 Waste Management & Resource Recovery Association Australia (WMRR)
123 Waste Management & Resource Recovery Association Australia (WMRR)
124 Waste Management & Resource Recovery Association Australia (WMRR)
125 Waste Management & Resource Recovery Association Australia (WMRR)
126 East Waste
127 Waste Management & Resource Recovery Association Australia (WMRR)
128 Waste Management & Resource Recovery Association Australia (WMRR)
129 Waste Management & Resource Recovery Association Australia (WMRR)
130 East Waste
131 Waste Management & Resource Recovery Association Australia (WMRR)
132 East Waste
133 East Waste
134 East Waste
135 East Waste
136 Confidential Submission 1
137 Confidential Submission 1
138 Australian Food & Grocery Council
139 Phantm (Planet Positive)
140 National Retail Association
141 Confidential Submission 3
142 National Retail Association
143 Little Green Panda Pty Ltd
144 Confidential Submission 4
145 Confidential Submission 2
146 Australian Food & Grocery Council
147 Confidential Submission 1
148 National Retail Association
149 Huhtamaki
150 National Retail Association
151 National Retail Association
152 National Retail Association
153 National Retail Association
154 Australian Food & Grocery Council
155 National Retail Association
156 National Retail Association
157 Australian Food & Grocery Council
158 National Retail Association

159 Australian Food & Grocery Council
160 Huhtamaki
161 Confidential Submission 2
162 National Retail Association
163 Genfac
164 Confidential Submission 2
165 Australasian Bioplastics Association
166 Confidential Submission 2
167 Confidential Submission 2
168 Confidential Submission 2
169 Genfac
170 Huhtamaki
171 National Retail Association
172 National Retail Association
173 Confidential Submission 2
174 National Retail Association
175 Confidential Submission 2
176 Australian Food & Grocery Council
177 Planet Ark 'National Recycling Week Research 2020: A Future Beyond the Bin'
178 Confidential Submission #2
179 Trashd
180 Confidential Submission 2
181 Trashd
182 National Retail Association
183 Trashd
184 Confidential Submission 2
185 Confidential Submission 2
186 National Retail Association
187 National Retail Association
188 The Hygiene Co.
189 National Retail Association
190 Genfac
191 Genfac
192 National Retail Association
193 Confidential Submission 2
194 National Retail Association
195 Confidential Submission 4
196 Confidential Submission 1
197 Confidential Submission 2
198 Confidential Submission 1
199 National Retail Association
200 Confidential Submission 1
201 Confidential Submission 4
202 Confidential Submission 2
203 National Retail Association
204 The Hygiene Co.
205 Australasian Bioplastics Association
206 Genfac
207 National Retail Association
208 National Retail Association
209 National Retail Association
210 Phantm (Planet Positive)
211 Phantm (Planet Positive)
212 National Retail Association

213 National Retail Association
214 National Retail Association
215 National Retail Association
216 Confidential Submission 2
217 Genfac
218 National Retail Association
219 National Retail Association
220 Genfac
221 Trashd
222 National Retail Association
223 Confidential Submission 1
224 National Retail Association
225 Australian Food & Grocery Council
226 Australian Food & Grocery Council
227 National Retail Association
228 National Retail Association
229 Little Green Panda Pty Ltd
230 Little Green Panda Pty Ltd
231 Little Green Panda Pty Ltd
232 National Retail Association
233 Huhtamaki
234 Huhtamaki
235 National Retail Association
236 Genfac
237 National Retail Association
238 National Retail Association
239 Confidential Submission 2
240 Confidential Submission #2
241 Little Green Panda Pty Ltd
242 Confidential Submission 2
243 Little Green Panda Pty Ltd
244 Trashd
245 Trashd