Green Industries SA

Turning the tide on single-use plastic products Discussion Paper

Consultation response document

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1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

During January and February 2019, South Australians were invited to provide comments and other feedback on the discussion paper *Turning the tide on single-use plastic products*. This discussion paper sought to further the public conversation about a range of single-use plastic products that are impacting the environment.

Those people contributing to this consultation will help inform the government's continued efforts to maintain South Australia's national leadership in recycling and a transition to a circular economy. Green Industries SA (GISA) thanks the individuals and organisations who submitted feedback.

The response document summarises the key themes and issues emerging from this wide-ranging consultation. It will help inform government interventions on single-use plastic products to be developed during the coming year.

The consultation used different channels to ensure that feedback was gathered from a wide variety of stakeholders - from members of the community to those with professional or community-based interests in this topic, such as Local Government, Non-Government Organisations (NGOs) and shared interest groups, waste and resource recovery organisations, business and industry stakeholders.

GISA received 3564 submissions, comments, survey responses and letters from members of the general public. In addition, 68 submissions were received from industry stakeholders. The strong weight of public opinion is an indication of the degree of interest in the topic of single-use plastics among South Australians.

1.2 COMMUNITY RESPONSE

Amongst members of the community who took the time to share their stories and opinions, recognition of the environmental problem of single-use plastics was high (99%). Support for government intervention to address these items was similarly high (97%) among the responding community.

In addition to the items stated in the discussion paper (single-use plastic straws, plastic cutlery and plastic-lined takeaway coffee cups), 91% of the people responding felt that there are other items to be considered for government intervention. This list of suggested inclusions is long and varied, with the majority relating to the packaging of items by manufacturers or at retailers' point of sale and items used in the away-from-home meals sector.

While there were many suggestions for items to be included, there was also recognition for single-use plastic products to be excluded for reasons specific to their purpose and those relying upon them. These were: products and aids used by people living with disability; and medical items requiring special use, packaging, sterility, storage.

When asked if they knew the difference between the terms 'biodegradable', 'degradable' and 'compostable' 49% of those responding said they did, leaving 51% who recognise that they do not. However, when people were asked if all checkout bags and produce bags should be made from compostable materials, 93% of the people responding agreed that these should be.

There was also strong support for extending South Australia's current ban on lightweight plastic bags to include thicker ones. 86% agreed with this, 6% disagreed and 6% remained unsure. People were also asked if they look for advice about recycling and disposal on packaging and 94% said that they did.

In addition to responses to the formal questions, South Australians were generous with their advice and feedback on a range of topics when asked to provide any other comments. 56% of these responses were from people telling the government to act on single-use plastics, and 37% gave tips on improving our waste management systems, while another 37% encouraged the State to take decisive action urgently.

15% were pleased with the opportunity to engage in the consultation process and told GISA to keep up the good work.

1.3 INDUSTRY RESPONSES

The range of industry stakeholders responding to this consultation is also a testament to their professionalism, engagement and willingness to collaborate for the benefit of South Australia, and beyond.

The industry stakeholders were asked to respond to a range of questions about single-use plastic products and their effects on South Australia, the environment, their sectors and main areas of interest and involvement in this topic.

All the stakeholders across each of the industry sectors and stakeholder groups agreed that single-use plastic bags are causing environmental problems and many referred to published evidence. In response to the question 'What do you consider to be the most important problem associated with single-use plastics that needs to be addressed?' different contributors gave different priorities to the most important problems to address and some of those frequently-mentioned were:

- Providing an effective way of managing single-use plastic waste
- Reducing the use of single-use plastics in our daily lives
- Replacing non-recyclable plastics with ones which can be reused or recycled
- Stopping the environmental harm caused by single-use plastic
- Educating South Australians on the correct way(s) of sorting waste
- Improving labelling on packaging
- Creation of a circular economy.

All stakeholders from the industry sectors and groups shared the view that extending the ban on lightweight single-use shopping bags to include thicker plastic bags would be instrumental in reducing the use of plastic bags. However, there were diverging opinions of how this could be achieved and requesting further consultation, collaboration and consideration of impacts before proceeding with intervention.

Compostable bags were much preferred alternatives to many of the non-compostable bags in use today, because these can be disposed of through most 'green bin' collections and decompose to nothing, with treatment and/or over time.

In addition, these have proven successful in reducing food waste going to landfill and provide opportunities for local production that may drive economic development within the state. An argument against widespread introduction of compostable options is that it would perpetuate the 'use and throw away' behaviours that many are trying to change.

There was no support for the use of biodegradable and degradable bags because these can break down and create smaller pieces of plastic, creating environmental issues. This was not always thought to be the case with compostable bags.

The majority of the stakeholders participating in this consultation were in favour of reducing the availability and use of all plastic bags but cautioned decision makers against interventions which were enacted without due consideration and before viable alternative products were available, particularly for the people who do reuse their bags for other purposes, e.g. bin liners, cleaning, shopping, food waste disposal.

Stakeholders were supportive of increased measures to address harmful single-use plastics and many shared the ways that they were already achieving this in their own organisations and communities.

A list of additional items was generated from the submissions as well as it being stated that new technologies and processes exist to resolve some of these issues, drawing attention to the fact that a ban may not necessarily be the only solution. Suggestions for items to be excluded from the government's consideration included:

- Those used in medical and/or aged settings and by people living with disability
- Items to be included in South Australia's Container Deposit Scheme
- Items to be dealt with nationally or by other schemes
- Compostable items
- Items for which viable recycling/resource recovery technology exists.

There was strong support for improvement in product labelling and other efforts to provide education for product users. Many referred to the newly-launched Australian Recycling Label (ARL) as being a positive step from a national perspective.

The main message received from the manufacturing and importing sector was the need for ongoing consultation and collaboration, particularly on matters which may increase costs, decrease quality and/or otherwise put businesses at risk. Retailers also called for ongoing discussions and engagement on these matters because of the wide-ranging influence on their current and forecast operations.

Many of these stakeholders are also consumers and they provided a comprehensive list of suggested areas for action from government and others in South Australia, nationally and globally. There was widespread support for government intervention across these industry sectors and stakeholder groups, with the rationale that only through this will change(s) be achieved.

However, individual stakeholders' opinions of the forms this intervention may take varied, with some seeking legislative reform, while others recommended public education campaigns as first resort. Many different suggestions have been provided, along with pros and cons of different approaches, resulting in a multitude of options to be considered and researched.

Finally, submissions addressing the question on restricting the sale or supply of some single-use plastic or other single-use products for which there are more sustainable alternatives agreed that this was a good idea and to increase its scope, some also provided the advice to be aware of the consequences of change and to continue to engage with all stakeholders before enacting any decisions.

2.0 CONSULTATION RESPONSE

2.1 INTRODUCTION

During January and February 2019, South Australians were invited to provide comments and other feedback on the discussion paper *Turning the tide on single-use plastic products*. This discussion paper sought to further the public conversation around a range of single-use plastic products that are impacting the environment. Those contributing to this formal process of consultation will help inform the government's continued efforts to maintain South Australia's national leadership in recycling and our transition to a circular economy.

The consultation was held across a range of different channels to ensure that feedback was gathered from a wide variety of stakeholders - from members of the community to those with professional or community-based interests in this topic, such as Local Government, Non-Government Organisations (NGOs) and shared interest groups, waste and resource recovery organisations, business and industry stakeholders.

2.1.1 THANK YOU

We thank the approximately 3630 individuals and organisations who have taken the time to prepare and submit their feedback to Green Industries SA (GISA). This response document summarises the key themes and issues emerging from this wide-ranging consultation. It will help inform government interventions on single-use plastic products to be developed during the coming year.

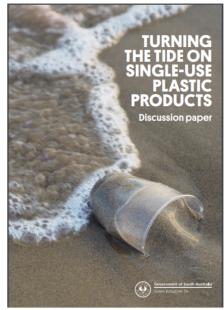
2.2 HOW WE CONSULTED

2.2.1 CONSULTATION CHANNELS

South Australians were invited to provide both structured and unstructured feedback on the discussion paper *Turning the tide on single-use plastic products*. Members of the community used the following channels to share their opinions:

- The South Australian Government's YourSAy community consultation website
- Survey Monkey online questionnaires
- Emails and posted letters received by GISA and Members of Parliament
- Comments made through the Minister for Environment and Water's social media channels.

Industry stakeholders were invited to submit responses online, or to email documents to GISA, the Minister for Environment and Water or their Member of Parliament, or by post.



2.2.2 PARTICIPANTS

2.2.2.1 Community responses

We received 3564 submissions, comments, survey responses and letters from individuals identifying as members of the general public, via the following channels:

- YourSAy comments 180
- Survey Monkey 3108
- Emails, posted letters 40
- Comments from the Minister for Environment and Water's social media channels, including Facebook, Instagram and LinkedIn feeds - 236.

2.2.2.2 Industry stakeholders

In addition, industry stakeholders submitted feedback by email, survey, posted letters and documents. These stakeholders represented the following sectors:

Local Government responses (10)

- City of Adelaide
- City of Campbelltown
- City of Holdfast Bay
- City of Marion
- City of Mitcham
- · City of Port Adelaide Enfield
- City of Prospect
- City of West Torrens
- Local Government Association of South Australia
- The Barossa Council.

NGOs and shared interest groups (23)

- A Simple Shift
- Australian Industrial Ecology Network Pty Ltd
- Boomerang Alliance
- City of Burnside, administration staff (waste management)
- Conservation Council SA
- Consumers Association of South Australia Inc.
- Eco Matters Queensland
- Environmental Defenders Office (SA) Inc
- Good Design Australia
- KESAB Environmental Solutions
- Loop Circular Economy Platform
- Low Waste Events and Education
- No Balloon Release Australia
- Public Health Association of Australia
- SA Greens
- Sea Shepherd Australia
- Soroptimists International (Region of South Australia)
- Soroptimists International of Barossa Valley
- Tea Tree Gardens Residents Association Inc.
- The Friends of the Gulf of St. Vincent
- Transmutation Pty Ltd
- Twenty Thirty
- Walk for Climate Change Action/Responsible Cafes in Mid North SA.

Waste and resource recovery organisations (12)

- Adelaide Hills Region Waste Management Authority (AHRWMA)
- Australian Council of Recycling (ACOR)
- Closed Loop Environmental Solutions
- Eastern Waste Management Authority (EastWaste)
- Fleurieu Regional Waste Authority
- Jeffries Group
- National Waste and Recycling Industry Council (NWRIC)
- Northern Adelaide Waste Management Authority (NAWMA)
- Peats Group Ltd
- Reloop Pacific
- Waste Management & Resource Recovery Association Australia (WMRR)
- Waste & Recycling Industry Association (SA) (WRISA).

Business and industry stakeholders (24)

- Australian Food and Grocery Council
- Australian Hotels Association (SA)
- Australian Packaging Covenant Organisation
- Business SA
- Campbell's Arnott's
- Closed Loop Environmental Solutions
- Coca-Cola Amatil
- Detmold Group
- Ernst & Young
- Expanded Polystyrene Australia
- The Australian Industry Group
- The Food Forest
- Greeneco
- National Retail Association
- PVC Separation Holdings Pty Ltd
- PAK 360
- Rawtec
- Restaurant & Catering Australia
- South Australian Independent Retailers
- South Australian Wine Industry
- The Cup Exchange
- TLI (Aust) Pty Ltd
- Transmutation Pty Ltd
- Woolworths Group
- Plus, industry 40 survey responses via YourSAY site.

2.3 WHAT YOU TOLD US

2.3.1 THE COMMUNITY

The weight of public opinion in response to this invitation to provide feedback to GISA is an indication of the degree of interest in the topic of single-use plastics among South Australians. In addition to the information received while responding to the formal questions during this consultation, GISA has received a great deal of rich and generous advice relating to the topics of environmental sustainability, waste management, economic development, packaging, governance and a host of other aspects of managing our world of today and for future generations.

Of those members of the community who took the time to share their stories and opinions, recognition of the environmental problem of single-use plastics was high (99%).

"Absolutely, I see these plastics everywhere I go. Plastic never completely degrades. Once we use a soft plastic, it (sic) basically on this planet forever, in one form or another. Our animals are suffering and we ourselves are literally drinking water with micro plastics in it"

Support for government intervention to address these items was similarly high (97%) among the responding community.

"SA was a pioneer of the money for bottles recycling schemes so there is no reason why we couldn't go one further and ban single-use plastics at state level and provide non-plastic alternatives. I think voluntary is all well and good but law and policy really gets stuff done... when implemented well. Let's reiterate that last point. If the government intervention is done smartly and efficiently"

In addition to the items stated in the discussion paper (single-use plastic straws, plastic cutlery and plastic-lined takeaway coffee cups), 91% of the people responding felt that there are other items to be considered for government intervention. This list of suggested inclusions is long and varied, with the majority relating to the packaging of items by manufacturers or at retailers' point of sale and items being used in the away-from-home meals sector.

While there were many suggestions for items to be included, there was also recognition for single-use plastic products to be excluded for reasons specific to their purpose and those relying upon them. These were:

- Products and aids employed by people living with disability
- Medical items requiring special use, packaging, sterility, storage etc.

When asked if they knew the difference between the terms 'biodegradable', 'degradable' and 'compostable' 49% of those responding said they did, leaving 51% who recognise that they do not.

However, when people were asked if all checkout bags and produce bags should be made from compostable materials, 93% of the people responding agreed that these should be.

"Of course, that is a no brainer"

There was also strong support for extending South Australia's current ban on lightweight plastic bags to include thicker ones. 86% agreed with this, 6% disagreed and 6% remained unsure.

"Absolutely! Brilliant idea!"

People were also asked if they look for advice about recycling and disposal on packaging and 94% told us that they did.

In addition to responses to the formal questions, South Australians were generous with their advice and feedback on a range of topics when asked to provide any other comments. 56% of these responses were from people telling the government to act on single-use plastics, and 37% gave tips on improving our waste management systems, while another 37% encouraged the State to take decisive action urgently.

15% were pleased with the opportunity to engage in the consultation process and told us to keep up the good work.

"Thank you. I do hope that this can lead to the change we desperately need"

2.3.2 INDUSTRY STAKEHOLDERS

The range of industry stakeholders responding to this consultation is also a testament to their professionalism, engagement and willingness to collaborate for the benefit of South Australia, and beyond.

The industry stakeholders were asked to respond to a range of questions about single-use plastic products and their effects on South Australia, our environment, their sectors and main areas of interest and involvement in this topic. Responses have been summarised below.

Do you consider single-use plastic bags are causing environmental problems?

All the stakeholders across each of the industry sectors and stakeholder groups agreed, and many referred to published evidence of this fact.

"Single-use plastic products are clearly causing significant environmental harm as proven by countless credible scientific studies undertaken worldwide over many years"

What do you consider to be the most important problem associated with single-use plastics that needs to be addressed?

Different contributors gave different priorities to the most important problems to address and some of those frequently-mentioned were:

- Providing an effective way of managing single-use plastic waste
- Reducing the use of single-use plastics in our daily lives
- The cost and time required for reducing environmental damage and increasing environmental remediation
- Replacing non-recyclable plastics with ones which can be reused or recycled
- Educating South Australians on the correct way(s) of sorting waste
- Improving labelling on packaging
- Creation of a circular economy

"The lack of an effective recycling system for single-use plastic products is the key issue that the market has failed to resolve"

"Every piece of plastic we stop from entering the ocean is a potential life saved"

What are your views on extending South Australia's ban on lightweight single-use shopping bags to include thicker plastic bags? What would be the consequences of such action for the community, businesses and the environment?

All stakeholders from the industry sectors and groups shared the view that extending this ban would be instrumental in reducing the use of plastic bags. However, there were diverging opinions of how this could be achieved and requesting further consultation, collaboration and consideration of impacts before proceeding with intervention.

"We would encourage businesses and community to embrace a circular economy and support customers bringing their own bags instead of relying on business (including supermarkets) to provide them"

"They require significantly more resources to produce, and by volume per bag produce significantly more harmful micro plastic particles"

"The City supports broadening the review to include consideration a (sic) holistic systems-based approach that is focused on customer experiences"

Should all checkout bags and produce bags (i.e. for grocery items) be made from compostable (Australian Standard 4736-2006) material? What would the impacts be for retailers, consumers and industry? Would there be demand and flow-on benefits in establishing new industry to produce compostable bags here in SA?

Compostable bags were much preferred alternatives to many of the non-compostable bags in use today, because they can be disposed of through most 'green bin' collections and decompose to nothing with treatment and/or over time. In addition, we were told, they have proven successful in reducing food waste going to landfill and provide opportunities for local production that may drive economic development within the state.

"Compostable options provide exactly the same user experience with the entire range of benefits at the end of its useful life"

An argument against widespread introduction of compostable options is that it would perpetuate the 'use and throw away' behaviours that many are trying to change.

"... a lack of clarity around handling of the material may lead to a higher degree of littering behaviour by consumers, creating a counter-intuitive outcome"

What do you do with biodegradable, degradable or compostable bags once you have finished using them? What do you think about the idea of banning lightweight single-use shopping bags even those made from biodegradable, degradable or compostable substances as has been proposed in other Australian jurisdictions?

There was no support for the use of biodegradable and degradable bags because they can break down and create smaller pieces of plastic, creating environmental issues. This was not always thought to be the case with compostable bags.

"With the current technologies available, there are very few single-use plastics that cannot be replaced with alternate packaging, legitimately recyclable materials or truly compostable materials, all of which can integrate into the circular economy"

The majority of the stakeholders participating in this consultation were in favour of reducing the availability and use of all plastic bags but cautioned decision makers against interventions which were enacted without due consideration and before viable alternative products were available, particularly for the people who do reuse their bags for other purposes, e.g. bin liners, cleaning, shopping, food waste disposal.

Do you think South Australia should introduce measures to address items such as single-use plastic straws and plastic-lined take away coffee cups? What other single-use plastic items or single-use products would you like to be considered for possible government intervention?

Stakeholders were supportive of increased measures to address harmful single-use plastics and many shared the ways that they were already achieving this in their own organisations and communities.

"Council is embracing its leadership role in this space and is currently exploring the idea of prohibited use of straws and single-use food packaging and utensils at Council licensed events"

A list of additional items was generated from the submissions as well as it being pointed out that new technologies and processes exist to resolve some of these issues, drawing attention to the fact that a ban may not necessarily be the only solution.

"... that need and availability of sustainable alternatives be the principles underpinning decisions on which products to focus on at this stage"

What are your views on the list of items excluded (see page 30) and do you think there are others that do not require additional action or should be exempt from possible government intervention, and why? Are there exclusions that should be included? Why?

Responses to this question resulted in a range of suggestions for items to be excluded from the government's consideration:

- Those used in medical and/or aged settings and by people living with disability
- Items to be included in South Australia's Container Deposit Scheme
- Items to be dealt with nationally or by other schemes
- Compostable items
- Items for which viable recycling/resource recovery technology exists.

Do you think that labelling describing how to recycle or dispose of a product, or parts of the product is helpful to consumers? For which products would better labelling enable better disposal?

There was strong support for improvements to product labelling and other efforts to provide education for product users. Many referred to the newly-launched Australian Recycling Label (ARL) as being a positive step in the right direction for improved future outcomes, from a national perspective.

"Our contribution to this is simplicity in the message, clear, concise and consistent labelling of all the items to allow correct recycling to be easily undertaken"

If you are a South Australian based manufacturer or importer of any of the single-use plastic products mentioned in this discussion paper, what are your views on this topic? Do you have access to alternatives? Are there cost impacts that need to be considered as part of the discussion?

The main message we received from members of the manufacturing and importing sector was the need for ongoing consultation and collaboration, particularly on matters which may increase costs, decrease quality and/or otherwise put businesses at risk.

"For us, the impact would be financial. We have been researching and trialling home compostable packaging for the past two years; these products are three times the costs of our current materials"

If you are a retailer or business that sells, offers or provides single-use plastic products mentioned in this discussion paper, what are your views on this topic?

Retailers also called for ongoing discussions and engagement on these matters because of the wideranging influence on their current and forecast operations.

"Any change in legislation needs to have a wide level of support and understanding by retailers and consumers"

As a consumer of single-use plastic products mentioned in this discussion paper, what are your concerns? What would you like to see done to address the problem(s) or concern(s)?

Many of these stakeholders are also consumers and they provided a comprehensive list of suggested areas for action from government and others in South Australia, nationally and globally.

"Many people feel helpless to effect change"

"It is timely now that this be done. Now, more than any time previously consumers are mindful of the damage plastic is wreaking on the environment"

Do you think government intervention is required in relation to single-use plastic products or other single-use items? If so, what type and in what timeframe?

There was widespread support for government intervention across these industry sectors and stakeholder groups, with the rationale that only through this will change(s) be achieved.

"South Australia should again not be afraid to lead from the front and lead by example. We have the community on board. We know what needs to be done; and the time is right"

However, individual stakeholders' opinions of the forms this intervention may take varied, with some seeking legislative reform, while others recommended public education campaigns as first resort. Many different suggestions have been provided, along with pros and cons of different approaches, resulting in a multitude of options to be considered and researched.

"By introducing legislation, the government will simply be providing the final additional push that industry need (sic) to switch to more sustainable packaging options. This is difficult for

a single operator to implement when competing with many other retailers, but if the whole state shifts at one, no business is unfairly penalised"

Do you think restricting the sale or supply of some single-use plastic or other single-use products for which there are more sustainable alternatives is a good idea?

While all submissions addressing this question agreed that this was a good idea, and to increase its scope, some also advised to be aware of the consequences of change and to continue to engage with all stakeholders before enacting any decisions.

"Be aware of unintended consequences from any legislation and provide for appropriate exemptions, subject to the introduction of suitable alternative, e.g. use of flexible plastic straws by disabled persons"

3.0 DETAILED FEEDBACK

3.1 THE SOUTH AUSTRALIAN COMMUNITY

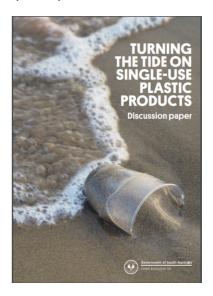
3.1.1 SOURCES OF FEEDBACK FROM THE SOUTH AUSTRALIAN COMMUNITY

During this consultation, South Australians were invited to provide both structured and unstructured feedback on the discussion paper *Turning the tide on single-use plastic products*.

Members of the community used the following channels to share their opinions:

- The South Australian government's YourSAy community consultation website 180 comments
- Survey Monkey online questionnaire (general public)
 3108 respondents
- Survey Monkey online questionnaire (manufacturers, importers, retailers) 40 respondents
- Emails and posted letters to GISA and Members of Parliament – 40 received
- Social media comments 236 received.

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



3.1.2 THE ONLINE PUBLIC SURVEY VIA 'YOURSAY' SAY AND SURVEY MONKEY

All members of South Australia's community were invited to participate in a confidential online survey. The survey ran from 7 January to 22 February 2019 and collected responses from people who had voluntarily accessed the YourSAy site and followed a link to the online survey tool (Survey Monkey, refer Appendix 1).

The 'YourSAy' site invited South Australians to participate in the consultation (refer Appendix 2) and engagement has been analysed and the report is in Appendix 3.

People were able to leave generalised comments on the YourSAy site in response to the question of "What are the best approaches government could take to address the issue of single-use plastics?" and/or progress through to an online survey.

This survey asked the following questions:

- Respondent details (mandatory): name, address, suburb, state, postal code, country, email address, phone number
- Do you consider single-use plastic products are causing environmental problems?
- Is government intervention required in South Australia to address items such as single-use plastic straws, plastic cutlery and plastic-lined takeaway coffee cups?
- Are there other single-use plastic items or single-use products that you think should be considered for possible government intervention?
- Please list any items you think should be considered for possible government intervention
- Can you tell the difference between 'biodegradable', 'degradable' or 'compostable' bags?
- Should all checkout bags and produce bags (i.e. fruit & veg bags) be made from compostable materials?

- Should South Australia's existing plastic bag ban be extended to include thicker plastic shopping bags?
- Do you look for recycling advice on packaging to help you recycle or dispose responsibly?
- Do you have any further comments?

At closing, 3108 people responded to this invitation to undertake the survey, answering either all or some of the optional questions. Responding was optional and respondents were drawn from the South Australian community who were both aware of the consultation (through any channels) and motivated to register and participate in it. For these reasons, these respondents cannot be described as providing a randomised or statistically representative sample of South Australian householders.

Those submitting feedback were assured that their responses would remain confidential and anonymous, therefore contact details have not formed part of this reporting.

A summary of these results follows.

3.1.2.1 Are single-use plastic products causing environmental problems?

Respondents were asked the following question:

Do you consider single-use plastic products are causing environmental problems?

N=3106	Number	Per cent (%)
YES	3071	99%
NO	27	1%
UNSURE	8	<1%

^{*}Percentages adding to greater or less than 100% are due to the effects of rounding to the nearest whole number.

99% of those responding to the consultation's survey considered that single-use plastic products are causing environmental problems.

Respondents were then provided with the option of writing additional comments. These written responses were grouped into themes, counted and have been reported in the table below:

Multiple responses	YES		N	10	UNSURE	
	Number	Per cent (%)	Number	Per cent (%)	Number	Per cent (%)
I agree there is a problem(s) and a restatement/definition of the problem	463	15%	5	<1%	2	<1%
Suggesting solutions	89	3%	1	<1%	2	<1%
Sharing "how I have witnessed the problem"	82	3%	0	0%	0	0%
Listing specific items creating/causing the problems	58	2%	1	<1%	1	<1%
Calling for urgent/immediate action	32	1%	0	0%	0	0%
Here's what I'm doing to alleviate/solve the problem	18	1%	0	0%	0	0%
Cause of problem is not me/Australia	7	<1%	1	<1%	0	0%
No proof	0	0%	1	<1%	0	0%

^{*}Percentages adding to greater or less than 100% are due to the effects of rounding to the nearest whole number.

A quarter of the respondents to this survey provided additional comments to this question and the majority were received from people who had previously agreed that single-use plastic products are causing environmental problems.

"Absolutely, I see these plastics everywhere I go. Plastic never completely degrades. Once we use a soft plastic, it basically on this planet forever, in one form or another. Our animals are suffering and we ourselves are literally drinking water with micro plastics in it"

463 people used this opportunity to state (or restate) that they agree that single-use plastics are causing environmental problems and shared their understanding and observations of these:

- The use of non-renewable resources in the production of single-use plastics
- Harm to land and marine life and their environments
- Litter
- Increased costs to consumers
- Climate change acceleration
- Human harm through ingestion and leeching into food chains and bodies, etc.

89 people suggested a wide range of possible solutions to reducing and avoiding the use of single-use plastics or reusing, recycling and/or disposing of them correctly:

- Manufacturers to re-think packaging
- Exploring alternative to single-use plastics
- Replacing single-use plastics with re-usable items
- Educating and changing behaviours
- Legislation and/or punitive measures to encourage behavioural change
- Focusing on public sector to lead change
- Increasing waste management options, etc.

82 people shared stories of how and where they had witnessed the problems created by single-use plastics, e.g. in their neighbourhoods, on beaches, while travelling overseas etc.

58 people listed items they felt were offenders in creating this environmental harm, e.g. straws, take away containers, bags etc.

32 people used the opportunity to call for immediate action from the State Government and/or others.

18 people used the opportunity to share what they are doing to alleviate the creation of environmental problems by single-use plastics, e.g. avoid, reduce, reuse, recycle etc.

7 people told us that the issue has been created overseas, e.g. the use/waste of single-use plastics in other countries.

9 of those responding with a comment were people who had previously answered 'No' to the question of whether they considered single-use plastic products to be causing environmental problems. It was suggested that the blame should be placed upon human behaviour, rather than these plastics themselves, e.g.:

"It is not the products themselves that are causing the environmental problem but the inappropriate disposal and general disregard for throwing things in a bin that is the issue"

One person felt that the issue is perpetuated overseas, another stated there was no evidence to support this claim and a respondent suggested re-education towards use of biodegradable plastics would be preferable to banning other forms of single-use products.

3.1.2.2 Preference for government intervention

Respondents were asked the following question:

Is government intervention required in South Australia to address items such as single-use plastic straws, plastic cutlery and plastic-lined takeaway coffee cups?

N=3104	Number	Per cent (%)
YES	3006	97%
NO	49	2%
UNSURE	49	2%

^{*}Percentages adding to greater or less than 100% are due to the effects of rounding to the nearest whole number.

97% of those responding to the consultation's survey agreed that government intervention is required to address the issues created by single-use plastics.

Respondents were then provided with the option of writing additional comments. These written responses were grouped into themes, counted and have been reported in the table below:

Multiple responses	YES		N	10	UNSURE		
	Number	Per cent (%)	Number	Per cent (%)	Number	Per cent (%)	
Reinforcing agreement	474	15%	1	<1%	6	<1%	
Solutions	223	7%	9	<1%	11	<1%	
We must legislate/ban/effect punitive measures	186	6%	2	<1%	3	<1%	
Listing of items to be included in government intervention	27	1%	0	<1%	2	<1%	
Not just SA, it's national/global too	16	<1%	0	<1%	0	0%	
Concerns for people living with disability	11	<1%	2	<1%	0	0%	
The benefits of single-use plastics outweigh the concerns/outcomes	3	<1%	2	<1%	2	<1%	
Concerns about over-regulation/too much government intervention	1	<1%	3	<1%	0	0%	
Not a government issue	1	0%	6	<1%	0	0%	
The benefits	0	0%	1	<1%	0	0%	
Concern re: hygiene of reusable items	0	0%	1	<1%	0	0%	

Approximately a third of the respondents to this survey provided additional comments to this question, and again, the vast majority of these were received from people who agreed that government intervention is required to address the issue of single-use plastics.

"SA was a pioneer of the money for bottles recycling schemes so there is no reason why we couldn't go one further and ban single-use plastics at state level and provide non-plastic alternatives. I think voluntary is all well and good but law and policy really gets stuff done... when implemented well. Let's reiterate that last point. If the government intervention is done smartly and efficiently"

474 people provided comments that reinforced their support for government intervention:

- Set an example
- Will ensure compliance
- This is the purpose of government
- Only legislation/intervention will make it happen
- Self-regulation will not work
- Urgent, make it happen now
- Business/manufacturers won't do it without intervention, etc.

223 people took the opportunity to suggest solutions such as:

- Fund research into enviro-friendly items
- Councils to standardise collections/rules
- Subsidise start-ups focused on recycling/reusing/disposing
- Encourage more bulk goods
- Tax single-use plastics use
- Extend Container Legislation to include single-use plastics, etc.

186 commented on that which they saw as the imperative to enact legislation to ban the use of single-use plastics and/or effect punitive measures surrounding their deployment.

"The only sure way to address the problem of single-use plastic is to make a ban mandatory, so government intervention via legislation is required. Self-regulation and voluntary initiatives by industry have repeatedly been shown not to work and usually amount to greenwashing and delaying tactics"

27 people provided suggestions for items to be included in the ban, such as: plastic bags, out of home dining/drinking items, produce packaging, water bottles, snack food packaging, tobacco products and a range of product packaging, e.g. toys, consumer goods.

16 people mentioned that interventions should also encompass states and countries beyond South Australia because these populations also employ single-use plastics.

13 people (both for and against intervention) expressed concerns for the effect of government intervention on people living with disability, who may be needing single-use plastic products to support their daily living.

Of those who were against government intervention, 9 people suggested alternative solutions, e.g. public education, extension of recycling infrastructure, social procurement policies, subsidies for manufacturers, research and development investment etc.

The 20 others commenting, and not in favour of government intervention provided a range of comments, e.g. relying upon self-regulation, fear of high costs to the business/industry sectors, doubts about the sources of anti-plastic information, concerns for over-regulation, belief that the State Government's resources are better spent elsewhere etc.

3.1.2.3 Single-use plastic products to be considered for government intervention

Respondents were asked the following question:

Are there other single-use plastic items or single-use products that you think should be considered for possible government intervention?

N=3106	Number	Per cent (%)
YES	2815	91%
NO	293	9%

This question followed the one which asked about government intervention to "address items such as single-use plastic straws, plastic cutlery and plastic-lined takeaway coffee cups?" and 91% agreed that there are other items to be considered, leaving 9% who (presumably) felt that either the mentioned items were sufficient or that they did not support any government intervention (refer Question 3).

Following the above question, all respondents were asked:

Please list any items you think should be considered for possible government intervention

Respondents were invited to write in their suggestions for these items and their responses were grouped into themes, counted and have been reported in the table below:

Multiple responses	YES		NO	
	Number	Per cent (%)	Number	Per cent (%)
Packaging & products formulation & design created by manufacturers, retailers, producers etc	1702	55%	2	<1%
Out of home meals	1209	39%	2	<1%
Online shopping/goods delivery	255	8%	0	0%
Events, parties, occasions, festivals, E.G. XMAS, NYE, BIRTHDAYS, STADIUM EVENTS, SPORTS, AUS. DAY, EASTER	147	5%	0	0%
All single-use plastics/non-specific/anything not biodegradable or recyclable	123	4%	0	0%
Hospital/medical items	75	2%	0	0%
Non-plastic items	37	1%	0	0%
Commercial activities	20	1%	0	0%
Biodegradable plastics that create micro plastics	11	<1%	0	0%

91% of those responding to the survey provided their suggestions for the items they felt should be considered for possible intervention by government. This resulted in a long and varied list of plastics currently in use all the way along the supply chain.

The most-frequently mentioned area (by 55% of those responding) was packaging, either part of the product formulation, packaging at the point of manufacturing and/or applied at the retail point of sale:

- Formulation: microbeads in cosmetics, coffee pods, nappy wipes, polyester clothing, cotton buds, kids' toys
- Product packaging: snack food packaging, milk bottles, toothpaste tubes, plastic-coated cardboard
- Point of sale: Polystyrene meat trays, produce bags, plastic wrapped produce

Single-use plastic items employed during the consumption of away-from-home meals and beverages also attracted frequent mentions (39% of those providing comments):

- Beverage containers: plastic, plastic-lined cardboard cups
- Utensils, straws, stirrers
- Condiment packs
- · Bags, trays, drink caddies

Packaging specifically used during transport, particularly household online shopping was also singled out for specific mentions (8%), e.g. shrink-wrapping, plastic post bags, bubble wrap, packing pellets, foam, etc.

147 people also suggested that the government consider intervening in the use/supply of plastic items used during events (e.g. birthdays, Christmas, New Years Eve, festivals etc.), such as: bonbon toys, balloons, poppers, streamer, sporting merchandise, disposable tablecloths, bunting, glow sticks etc.

75 people specifically mentioned single-use items commonly found in medical setting, such as: vaccination packaging, saline bags, blister packs, bottle caps, gloves etc.

There was also a mention of the type of 'biodegradable plastics' which do not, in fact, degrade but break into smaller pieces and create environmental harm (11 people).

There were other comments received which did not provide a direct response to this question or were not specific enough to clearly assign to a relevant and meaningful category.

3.1.2.4 The difference between 'biodegradable', 'degradable' or 'compostable' bags

Respondents were asked the following question:

Can you tell the difference between 'biodegradable', 'degradable' or 'compostable' bags?

N=3108	Number	Per cent (%)
YES	1533	49%
NO	1575	51%

Responses to this question demonstrate that there is uncertainty surrounding the differences between the three forms of bags. Half of those responding to the survey are unable to tell the difference between 'biodegradable', 'degradable' or 'compostable' bags?

This question did not offer the opportunity to add further comments.

Following the question above, respondents were asked:

Should all checkout bags and produce bags (i.e. fruit & veg bags) be made from compostable materials?

N=3106	Number	Per cent (%)
YES	1419	93%
NO	56	4%
UNSURE	55	4%
NOT ANSWERED	1578	

^{*}Percentages adding to greater or less than 100% are due to the effects of rounding to the nearest whole number.

A little over half the respondents (1578) chose to not answer this question but all people were provided with the opportunity to write in additional comments. Of those who did respond, 93% agreed that all checkout bags should be compostable, 4% disagreed and 4% were unsure.

424 responded to the invitation to add further comment and these written responses were grouped into themes, counted and have been reported in the table below:

Multiple responses	YES		NO		UNSURE	
	Number	Per cent (%)	Number	Per cent (%)	Number	Per cent (%)
Agree, no rationale provided	144	5%	0	0%	0	0%
Agree, just hurry up and do it!	75	2%	0	0%	0	0%
An obvious decision/no brainer/it works/of course	45	1%	0	0%	0	0%
It's better for the environment/sustainable/ reduces landfill	30	1%	0	0%	0	0%
Need more education around "compostable" bags, e.g. How to dispose, what to use, how long can be used for, how long to degrading	29	1%	2	<1%	4	<1%

Multiple responses	Y	ES	N	0	UNS	URE
Prefer to see/buy an alternative, e.g. bag swap, container swap, BYO container/bag, paper, mesh, corn starch/cellulose, boxes, muslin, non-wax paper, cloth bags	23	1%	12	<1%	18	<1%
Must be able to be disposed of in garden compost/public bins/council pick-ups & green waste bins (not specialised industrial composting)	19	1%	4	<1%	5	<1%
Discourage all bag use/ideally no bags/ban all bags/encourage bag refusal (bags are the last option)	15	<1%	3	<1%	3	<1%
It's needed to assist behavioural change among those who continue to believe it's necessary to bag produce/do not bring their own bags	13	<1%	0	0%	0	0%
Ban pre-pack produce/do not wrap produce at all	12	<1%	1	<1%	0	0.0%
Incentivise use of non-single-use plastics/create compliance/create recycling	6	<1%	0	0%	0	0%
Ban all bags	5	<1%	0	0%	0	0%
Increase cost of bags at retail, e.g. 30c,50c	4	<1%	1	<1%	3	<1%
They will degrade to micro plastics/create environmental harm/biodegradable is bad for environment	2	<1%	3	<1%	1	<1%
Extend compostable plastics to other uses/all plastics should be biodegradable	1	<1%	5	<1%	1	<1%
It won't make a difference to me/already BYO bags	1	<1%	1	<1%	0	0%
Not strong/robust enough/cannot carry weights & wet items	0	0%	3	<1%	6	<1%
Still charge a fee for these	0	0%	2	<1%	0	0%

144 people mentioned that they agreed with this initiative but did not provide a clear rationale as to what was driving their opinion, such as:

75 people told us that they agree and also mentioned that it should occur as soon as possible:

"I don't understand why this is not already happening. There's compostable bags made already, just use them!"

30 people mentioned that the decision to use only compostable bags was an obvious one:

"Of course, that is a no brainer"

29 people suggested that householders require more education and direction to ensure correct disposal:

"Compostable in a domestic compost would be a great step forward. And much clearer labelling (sic) and education around how to do that so as they don't end up in landfill"

Along with 23 agreeing with the statement, the majority of those who were not in favour of compostable bags (12 people), or were unsure either way (18 people), suggested that there were other materials to choose from, covering fabrics such as: corn starch, cellulose, muslin, cloth, paper, mesh along with the option to bring one's own or swap containers.

The table above lists a number of other rationales for, and against, the introduction of compostable checkout and produce bags:

[&]quot;Yes, please!!!"

[&]quot;100%. It's ridiculous that they aren't and while we're at it, grocery stores should be held accountable for their ridiculous packaging of food"

- Ensuring they are compostable at home or via kerbside collections
- Foster behavioural change and/or focus instead on avoiding the use of these bags.

3.1.2.5 Extending the current ban to thicker plastic bags

Respondents were asked the following question:

Should South Australia's existing plastic bag ban be extended to include thicker plastic shopping bags?

N=3106	Number	Per cent (%)
YES	2680	86%
NO	191	6%
UNSURE	233	7%

^{*}Percentages adding to greater or less than 100% are due to the effects of rounding to the nearest whole number.

Of those South Australians responding to this survey, 86% agreed that the existing plastic bag ban should be extended to include thicker plastic shopping bags. 6% of these respondents disagreed and 7% remained unsure.

They were then invited to write additional comments and 1331 people did so. These written responses were grouped into themes, counted and have been reported in the table below:

Multiple responses	YES		NO		UNSURE	
	Number	Per cent (%)	Number	Per cent (%)	Number	Per cent (%)
Yes agree, with rationale	508	17%	11	<1%	19	1%
Yes/100% agree/absolutely/definitely - no rationale	231	8%	14	<1%	0	0%
Create more affordable/accessible/ preferable alternatives	57	2%	10	<1%	15	<1%
Ways of implementing ban/change	43	1%	2	0%	11	<1%
Tax/disincentive/increase price of thick plastic bags	29	1%	8	<1%	15	<5%
Agree, the current ban is not working	23	1%	2	<1%	1	<1%
Other items to ban	12	<1%	0	0%	2	<1%
No need to ban, with rationale	1	<1%%	41	1%	37	1%
Will cost customers/retailers/ manufacturers/businesses more	0	0%	3	<1%	1	0%
Why?	0	0%	2	<1%	11	<1%
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^{*}Percentages adding to greater or less than 100% are due to the effects of rounding to the nearest whole number.

The majority of these responses (508) agreed with the suggestion of extending South Australia's plastic bag ban to include thicker plastic shopping bags and there were a number of different reasons given for this concurrence:

- A ban will force people to change their bag use behaviour
- It will make no difference to those who have already ceased to use plastic shopping bags
- All plastic bags are harmful
- It will create new jobs, industries, opportunities for South Australians.

231 people also agreed with the proposal but did not provide their rationale:

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"Absolutely! Brilliant idea"
"Yes 100%"
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57 people used this opportunity to agree and suggest alternatives to the widespread use of plastic shopping bags:

- Bags made from a wide range of reusable and/or recyclable materials, such as: cotton, calico, hemp, paper, mesh, string etc.
- Bag swaps
- Creating education campaigns to drive behaviour change
- Decreasing consumers' cost of alternatives.

43 people also suggested different ways of implementing a ban on thicker plastic shopping bags:

- Public education campaign explaining: Why plastics are harmful, why a ban, what are your alternatives?
- Phase-out plan
- Incentivising businesses to make the change.

29 respondents agreed with the ban and also suggested that the price of plastic shopping bags should be greatly increased to further discourage use. Among these people, there was a recommendation that the funds raised from this action could be employed for the purposes of environmental remediation.

23 people agreed because they felt that the current ban is not working to reduce the use of plastic shopping bags.

12 of those agreeing also suggested other items to include in this extended ban, e.g. styrofoam cups, thin plastic produce bags.

Among those who disagreed with the extension of the ban to thicker plastic shopping bags were 41 people who provided a range of rationale:

- The thicker bags are convenient and serve different purposes
- They help when one forgets, or is without one's own shopping bag
- Educating the population is a better means of achieving behaviour change
- The problem would be fixed by improving recycling education and infrastructure.

25 of those who disagreed with the concept of extending the ban in the first part of this question, proceeded with comments indicating agreement.

10 people suggested that the development of more accessible and/or affordable alternative to plastic shopping bags would be preferable to a ban.

37 of those who told us they were unsure about a ban on thicker plastic shopping bags felt there were arguments for the use of these items, such as: convenience, opportunity to reuse, ability to be recycled etc.

19 of those unsure about the concept of extending the ban in the first part of this question, proceeded with comments indicating agreement.

41 people unsure about a ban suggested better ways of changing behaviours such as creating more accessible and affordable alternatives and/or discouraging the purchase of plastic bags through price increases, public education campaigning, phasing-out availability and providing monetary incentives to retailers.

11 of those unsure about a ban were seeking evidence and answers to assist in making this decision:

- Are thicker bags a problem?
- What is the effect on the environment?
- How will this ban effect retailers? Consumers?
- Are the alternatives better?

3.1.2.6 Advice on packaging

Respondents were asked the following question:

Do you look for recycling advice on packaging to help you recycle or dispose responsibly?

N=3101	Number	Per cent (%)
YES	2901	94%
NO	200	6%

94% of those responding to this survey agreed that they did look for recycling advice on packaging and 6% told us that they did not do this.

3.1.3 SUMMARY OF ALL OTHER FEEDBACK FROM THE COMMUNITY

In the final section of the survey, respondents were asked for any other comments and were provided with the open opportunity to submit other thoughts. This resulted in a wide-ranging list of related (and sometimes not related) suggestions and opinions surrounding the topic of single-use plastics.

In addition to the Survey Monkey survey, members of the community were invited to provide feedback via the YourSAy online public consultation tool. This offered South Australians the opportunity to post comments on topics of interest to them. In this case, the GISA team also responded to each comment within a short time of it being received.

Environment and Water Minister David Speirs' social media channels (Facebook, LinkedIn, Twitter and Instagram), Australia Post and emails also served to facilitate the general community's consultation, with both public and anonymous feedback being addressed to Members of Parliament, departmental staff and postal addresses.

In total, 1768 written responses were received from members of the South Australian community by these different channels and these have been aggregated, grouped into themes, counted, summarised and reported in the table below:

Multiple responses N=1768	Number	Per cent (%)
Government to intervene/influence/force the populous/industry to change behaviour/comply with desired waste disposal actions	987	56%
Improve waste management/recycling system	656	37%
Urging government to act now	649	37%
Suggestions for ways that government could change users' behaviour (non-legislative/policy-directed)	584	33%
Pleased/proud/complimentary about the single-use plastics consultation	261	15%
Protect the environment	227	13%
Reduce amount of single-use plastics	220	12%

Multiple responses N=1768	Number	Per cent (%)
Do not support government intervention	12	1%
Comment(s) not related to single-use plastics	47	3%

Of those 1768 people who provided this unstructured feedback, just over half (56%) used this opportunity to ask the government to take one or more direct actions to improve impacts and management of single-use plastics. These suggestions ranged widely from the inclusion of this subject matter into primary school lessons to agitating for national legislative change and the provision of subsidies and tax breaks to manufacturers:

- All single-use plastics and plastic bags should be banned from sale and/or use
- Ban (and/or phase out) all non-recyclable/non-compostable items
- Ban specific items, e.g. black meat trays, plastic milk bottles
- Reduce/remove tax on refillable items. Change tax to ensure refillable containers are cheaper than new items/packs
- Reduce/remove tax on reusable items and those which are alternatives to single-use plastics. Tax breaks to the manufacturers of these items/formats
- Enforce recycling across private and public institutions and industry
- Focus on enforcing sustainable waste avoidance, creation and management across hospitality sector
- Focus on enforcing sustainable waste avoidance, creation and management across local/state/federal public sector
- Mandate social procurement in public sector to include recycled products, e.g. playgrounds, benches, canteen items
- Uniformity in laws, policies, implementation across the state/across Australia
- Force acceptance of responsibility onto manufacturers, retailers, big business
- Make greedy manufacturers pay
- Accompany legislation and policy with explanatory communications, e.g. ads in supermarkets, on TV and other media, explain about harms of plastics, costs of recycling, create mass awareness of recycling benefits, show gruesome photos of the effects of single-use plastics on fish, animals and the environment
- Follow bans and practices of other nations to foster Zero Waste and circular economy initiatives, e.g. Scotland, Scandinavia, Germany, NZ, EU
- Government to lead, make bold decisions and follow-up
- More and higher fines for littering and dumping, e.g. cigarette butts, coffee cups
- Introduce and enforce laws for recycling and separating waste. Implement fines for noncompliance. Charge for remediation services to those who do not comply
- Fine and/or charge manufacturers who do not employ sustainable packaging, e.g. fine for use of non-recyclable items, manufacturer to bear the cost of recycling their products/packaging
- Fines and/or fees to be levied on overseas and online manufacturers and retailers
- Ban exports to countries without the infrastructure to recycle/reuse/dispose of in an environmentally-friendly manner
- Ban imports of non-recyclable items
- Mandate that manufacturers/retails are to accept return of packaging and dispose of it correctly, bearing that cost.

656 people suggested improvements to South Australia's waste management systems, in a wide variety of ways:

- Increase provision of organic bins across the state
- Improve public confidence in waste management chain, e.g. transparent reporting of outcomes and impacts, undertake recycling in Australia, cease shipping waste overseas
- Improve education surrounding waste sorting via product labelling, manufacturer, retailer and consumer campaigns, symbol development, compulsory and standardised pack iconography
- Provide clear pathways to gaining waste sorting information, e.g.: coffee lids, styrene, thermal receipts, bin liners
- Focus more on avoiding and reusing thus decreasing waste journeys

- Proper education and instructions for differentiating between compost, biodegradable and recycle of products/education about biodegradable & degradable/
- Increase the frequency of Council waste collections
- Increase sizes and location for soft plastics drop-off points, e.g. at supermarkets, kerbside household collections, different retailers
- Extending and promoting the waste management journey to include the development of more outcomes from recycling, e.g. produce new items, new jobs, new industries, new packaging, fewer virgin resources
- Introduce waste-deposit vending machines
- Subsidise/encourage increased use of, and preference for, recycled products
- Extend the Container Deposit Scheme to include more items, e.g. trays, cups, all bottles, large items, milk cartons, BYO cups
- Increase the range of items that can be recycled from kerbside collection, e.g. furniture, ewaste, clothing.

649 people wrote requesting urgent intervention due to concerns that single-use plastics are creating environmental harm and delays will increase this:

- Just do it. Let's do this. It is an imminent task. Time to take the next step we are surrounded by plastic and rubbish
- We will all adapt even businesses. Not easy, but possible
- Public are trying to mitigate the use of plastic bags
- People must be more proactive
- Our older generation lived without single-use plastics. We have survived before
- Be a leader here. Do this for the benefit of current and future generations. Make ourselves proud. We can do even more. We have to lead from the front
- We are already affecting our health by not doing anything. Food, fish, waters are contaminated with plastic
- Intervention will only reinforce current behaviours. I take my own bags to the shops. I back any legislation to shape the future. Many will volunteer to help make the change. I pick plastics on road side, beaches/ We wash and reuse our cups and boxes.

In addition to the suggestions for direct policy and/or legislative change, there were other suggestions asking government to encourage and persuade the public (rather than mandate), such as:

- Educate/teach correct disposal methods
- Provide regular information to the general public on waste management strategies
- Increase anti-littering education and information
- Provide education in schools
- Educate on how it helps in saving of costs
- Recycle Right website
- Develop a single-use plastics recycling symbol
- Clean up after festivals and events and/or assist with waste disposal during events
- Encourage use of biodegradable materials in public spaces, e.g. events, parks
- Encourage people to clean up their parks and camp sites
- Reduce the costs of compostable products
- Make more alternative options available
- Encourage the purchase of completely zero waste items, e.g. paper bags, wicker baskets, refillable water bottles, hemp baskets and bags
- Make it easier to change to a zero-waste lifestyle
- Fund research and development into new products and compostable materials, e.g. reuse agricultural waste etc.
- Incentives could be provided in various forms to encourage both buyers and sellers to reduce single-use plastics, e.g.: tax incentives, funded discounts
- Establish awards and other forms of recognition in the community
- Provide free biodegradable bags
- Convince more consumers to bring own bags

- Incentivise big and small companies to set up and sell their products/produce in environmentally friendly ways
- Establish "green ratings" for companies that "go green"
- Increase education around sustainable living to all ages and life-stages
- Encourage the state's health care system to consider alternatives to single-use plastic
- Develop a list of exceptions to a full ban, ensuring it does not impact on people living with disability
- Increased investment in locally-based "green initiatives"
- Encourage and attract foreign/interstate recyclers
- Invest in innovation in recycling to assist in establishment, grow jobs, boost the state's economy, encourage ecotourism and reduce the impacts of single-use plastics
- Provide incentives for manufacturing and retailing bulk buying of food to reduce packaging.

261 people took the time to provide complimentary feedback to those responsible for the instigation of this consultation and/or to show their pride in South Australia's leadership on this and other environmentally-focused initiatives, e.g.

"Great initiative! SA should continue to lead the nation as we always have on env. (sic) issues (CDS, recycling rates, shopping bag ban, etc.) Go hard!"

"Thank you, I do hope that this can lead to the change we desperately need!"

"Glad to see some potential action taking place ""

227 people communicated their concerns about the harm to the physical environment created and caused by single-use plastics specifically and/or all plastics generally:

- Harm to oceans, waterways and marine ecosystems
- Creating global warming and/or other forms of environmental crises
- Harm to all forms of life, including humans
- Our flora and fauna require protection for the effects of plastics
- Environmental harm also damages tourism
- Future generations will not have a world to inherit. Imploring actions to save the planet.

220 people provided many suggestions to reduce the need for single-use plastic products such as:

- Reducing food packaging, e.g. reducing plastic wrapping at point of sale, packaging in reusable, compostable or recyclable materials
- Developing a culture and practice surrounding BYO containers to retail outlets
- More drinking fountains for public use to reduce purchase of bottled waters
- Generally encouraging avoidance, reduction, recycling and reusing items and activities currently fulfilled by single-use plastics.

12 people wrote with feedback and comments which specifically did not support intervention into the provision and use of single-use plastic products.

"Stay out of it"

"Surely there's better issues to focus on"

Their rationales for these objections are summarised by the following:

- Government should stay out of this issue because it is not within the role of the State
- Government presence in this debate is unwelcome
- Government's resources are better spent on other matters. There are more pressing and significant matters to resolve
- Imposts derived from government intervention will be unaffordable and render businesses/communities unsustainable (particularly those in regional areas)
- It is better to trial/consider non-government interventions to motivate change.

3.2 INDUSTRY STAKEHOLDERS

Industry stakeholders were also invited to participate in this process of consultation on the topic of single-use plastics and they employed a variety of channels to provide feedback:

- YourSAy site and Survey Monkey online survey
- Emails to GISA
- Emails to MPs
- Posted letters and other documents.

At the completion of the consultation period, submissions were grouped into four categories of respondents, as follows:

- Business and industry
- Local Government
- NGOs and shared interest groups
- Waste and resource recovery sector.

Stakeholders were asked a series of specific questions, and some chose to provide responses conforming to this format, while others presented feedback in other, different forms. The range of questions posed during the consultation process were as follows:

- Do you consider single-use plastic bags are causing environmental problems?
- What do you consider to be the most important problem associated with single-use plastics that needs to be addressed?
- What are your views on extending South Australia's ban on lightweight single-use shopping bags to include thicker plastic bags? What would be the consequences of such action for the community, businesses and the environment?
- Should all checkout bags and produce bags (i.e. for grocery items) be made from compostable (Australian Standard 4736-2006) material? What would the impacts be for retailers, consumers and industry? Would there be demand and flow-on benefits in establishing new industry to produce compostable bags here in SA?
- What do you do with biodegradable, degradable or compostable bags once you have finished using them?
- What do you think about the idea of banning lightweight single-use shopping bags even those made from biodegradable, degradable or compostable substances as has been proposed in other Australian jurisdictions?
- Do you think South Australia should introduce measures to address items such as single-use plastic straws and plastic-lined take away coffee cups? What other single-use plastic items or single-use products would you like to be considered for possible government intervention?
- What are your views on the list of items excluded (see page 30) and do you think there are others that do not require additional action or should be exempt from possible government intervention, and why? Are there exclusions that should be included? Why?
- Do you think that labelling describing how to recycle or dispose of a product, or parts of the product is helpful to consumers? For which products would better labelling enable better disposal?
- If you are a South Australian based manufacturer or importer of any of the single-use plastic products mentioned in this discussion paper, what are your views on this topic? Do you have access to alternatives? Are there cost impacts that need to be considered as part of the discussion?
- If you are a retailer or business that sells, offers or provides single-use plastic products mentioned in this discussion paper, what are your views on this topic?
- As a consumer of single-use plastic products mentioned in this discussion paper, what are your concerns? What would you like to see done to address the problem(s) or concern(s)?
- Do you think government intervention is required in relation to single-use plastic products or other single-use items? If so, what type and in what timeframe?
- Do you think restricting the sale or supply of some single-use plastic or other single-use products for which there are more sustainable alternatives is a good idea?

3.2.1 FEEDBACK FROM THE BUSINESS AND INDUSTRY SECTOR

Submissions were received from the following organisations, and grouped under the Business and Industry category for the purposes of this summary reporting:

- Australian Food and Grocery Council
- Australian Hotels Association (AHA SA)
- The Australian Industry Group
- Australian Packaging Covenant Organisation
- Business SA
- Campbell's Arnott's
- Closed Loop Environmental Solutions
- Coca-Cola Amatil
- The Cup Exchange
- Detmold Group
- Ernst & Young
- Expanded Polystyrene Australia
- The Food Forest
- Good Design Australia
- Greeneco
- National Retail Association
- PVC Separation Holdings Pty Ltd
- PAK 360
- Rawtec
- Restaurant & Catering Australia
- South Australian Independent Retailers
- South Australian Wine Industry
- TLI (Aust) Pty Ltd
- Transmutation Pty Ltd
- Woolworths Group.

In addition, 40 respondents, identifying as being manufacturers, importers and retailers provided feedback via the online survey accessed from the YourSAy site, with 20 adding comments.

3.2.1.1 Do you consider single-use plastics bags are causing environmental problems?

The majority of the business and industry stakeholders participating in this consultation agreed that single-use plastic products are creating environmental issues and that reduction in their use and increase in correct disposals of them are preferable to current activities.

"Single-use plastic products are clearly causing significant environmental harm as proven by countless credible scientific studies undertaken worldwide over many years."

"Ideally, there would be no plastic straws and no use of any single-use plastics"ii

"... plastic packaging can negatively impact land and marine environments when it is not disposed of in a responsible manner'*iii

In contrast, there was a request for proof of the problematic effects of single-use plastics and the quantification of this in terms of: damage caused, proportions of single-use plastics in landfill, recycling of collected single-use plastics and the effects and costs of not having them in use.

"Without single-use plastics, it would be hard \dots to sell safe, and affordable products to our consumers" v

In a differing viewpoint, it was argued that the root of the cause of the environmental problems was consumers' behaviours and waste management practices (or lack of them).

"There is a higher chance for consumers to litter (with) single-use plastics"

Recommendations for an increase in waste education, collection and recycling infrastructure followed.

3.2.1.2 What do you consider to be the most important problem associated with single-use plastics that needs to be addressed?

The entirety of the effects of single-use plastics upon the environment was acknowledged as being complex and far-reaching. It was suggested that these issues are identified and ranked in priority order, to form the basis of a pathway to resolving the most urgent and problematic in turn.

"The concern about plastic going into our oceans and rivers is backed up by 81% of survey respondents identifying it as the most important problem associated with single-use plastics which needs addressing., followed by animals ingesting plastic (68%), a lack of recycling systems in place including collection, recycling technology and a market for recycled goods (61%) and large plastic items degrading into microplastics (56%)^{vi}

Items which are wholly or partially comprised of single-use plastics are manufactured from a range of different materials, each of which requires a specific waste management stream and/or recycling process.

"The lack of an effective recycling system for single-use plastic products is the key issue that the market has failed to resolve" vii

It was mentioned that if the standardisation of materials were to occur soonest, then a common recycling system could be developed, saving time, money and supporting economies of scale to resolve some of the problems associated with single-use plastics.

"This common (standard) approach will eliminate public confusion when collecting this packaging for recycling... thus creating a common recycling system having economy of scale/handling & processing automation" viii

3.2.1.3 Addressing the problem: The process of reduction of single-use plastics has begun within these sectors

In recognising the effects of single-use plastics on the environment and consumer demand, many of the industry and business submissions described the ways in which they and others are already contributing to the reduction of single-use plastics:

- Investment in, and developing new ways to reduce, reuse and recycle
- Participating in recycling programs and activities
- Removing single-use plastic products from sale, distribution and/or use
- Altering product formulation and/ or packaging components to be environmentally-friendly
- Revising labelling to include responsible disposal of plastics
- Tracking customer behaviour, with regard to plastics use and disposal
- Employee education
- Establishment of cooperative relationships with industry partners to create a circular economy and/or product lifecycle
- Planning for, and working with, government and others to manage regulatory change
- Supporting consumers' and customers' litter reduction and recycling activities
- Ceasing to automatically provide plastic items to customers and consumers, e.g. straws, bags
- Changing items used to those which are compostable, recyclable or reusable
- Encouraging bulk purchase, e.g. honey on tap
- Sourcing sustainable alternatives to current practice, e.g. offering a range of alternatives to consumer such as paper or pasta straws, offering reusable options
- Working with others, beyond SA and nationally, to share the benefits of their activities to assist with the reduction of single-use plastics in other countries
- Including recycled plastic content in the manufacture of in-store plastic shopping bags
- Staff volunteering for environmental clean-ups.

"We just don't need them and businesses who are still using them are being irresponsible" ix

My business is 100% committed to all reduction (sic) of single use plastic until there is no single use plastic" $^{\times}$

3.2.1.4 Addressing the problem: Further reducing single-use plastics in the future

The majority of these submissions supported the concept of introducing additional measures to reduce the quantum of single-use plastics but there was divergence in opinions on whether this can be achieved and the ways in which it may occur.

Various pathways were mentioned by these industry and business stakeholders, for future consultation and consideration e.g. a total ban on all single-use plastics, partial bans, development of bulk purchasing, industry-led self-regulation, consumer-led demand-reduction to influence supply, development of new waste stream, processes, outputs and equipment investment, expansion of the Container Deposit Scheme, government grants/subsidisations/incentives/tax breaks etc.

"Unless (a) new design of shape/size that can go through mechanical recycling facilities; cutlery, straw(s) will always present as issues"xi

3.2.1.5 What are your views on extending South Australia's ban on lightweight single-use shopping bags to include thicker plastic bags?

Where addressed, this question provoked requests for additional information because the issue was recognised as possibly being more complex than one which would result in a simple 'yes' or 'no answer to extending the current ban.

"Simply using thicker bags does not reduce the volume of plastic in landfill, or reduce the litter impact or threat to marine life posed by plastic carry bags"^{xii}

"A significant majority of members (77%) also support extending the ban on lightweight shopping bags to the thicker bags available at major supermarkets for 15c"xiii

"Recycling is not enough anymore there needed to be state, nation (sic) and worldwide bans on single use plastic and promotion, support and alternatives provided to individuals and businesses to make the transition" xiv

Among the reasons for this information-seeking were:

- Examination of alternative bags and their fit for purpose and availability
- Concerns for the longer-term effects of removing these bags from householder use, reuse and waste disposal practice
- Effect on food waste/organics disposal
- Number of times these bags are reused
- Whether these bags currently contribute to environmental issues (and if so, to what extent)
- Concerns for the effect on food safety and shopping hygiene.

3.2.1.6 Should all checkout bags and produce bags (i.e. For grocery items) be made from compostable (Australian Standard 4736-2006) material?

What would the impacts be for retailers, consumers and industry? Would there be demand and flow-on benefits in establishing new industry to produce compostable bags here in SA?

This request for feedback was met with mixed responses. Those not in favour were concerned about the lack of processing facilities for these materials.

Support was received among those who also asked if industry and the business sector would be able to gradually phase-out problematic plastics (where possible) and replace them with compostable materials.

"The flow on affects (sic) would be positive. It would create jobs in the circular economy due to local manufacturing of bags and the additional tonnes of food waste diverted from landfill"xv

It was frequently acknowledged that this was not likely to be achievable in every current instance of use of non-compostable plastics but that the activity would provide some positive effects on the environmental outcomes.

"Compostable options provide exactly the same user experience with the entire range of benefits at the end of its useful life..."xvi

"When a compostable plate is disposed of in a general waste bin and is then landfilled, the plate will decompose over time contributing to methane gas and production and greenhouse gas emissions"xvii

Many mentioned the need to carefully consider all aspects of this decision, in conjunction with industry stakeholders.

"APCO would encourage GISA to define degradation standards in collaboration with industry stakeholders" xviii

Ensuring that householders are able to access adequate collection and processing of these bags is fundamental to achieving positive outcomes. It was mentioned that this is a requirement to be addressed in both metropolitan and rural/regional/remote locations and therefore, further investigation into the materials, infrastructure, costs and education requirements will be required for the success of this initiative.

"The selection of compostable plastic must be capable of composting in home backyard... there will be a premium cost impact to consumers" xix

An alternative suggestion is to capitalise upon new technology and waste recycling processes to replace many of the single-use plastic products with combinations of paper/board and thin internal plastic films which can be recycled post-use in dedicated facilities, e.g. coffee cups, straws, cartons. In addition, it was recommended that these items could become part of South Australia's Container Deposit Scheme to incentivise return to Material Recycling Facilities.

"The compostable or biodegradable plastic collected is minimal in weight content (compared to the weight of paper collected) and can be used as composting/nutritional materials within the horticultural sector"xx

3.2.1.7 Do you think South Australia should introduce measures to address items such as single-use plastic straws and plastic-lined takeaway coffee cups What other single-use plastic items or single-use products would you like to be considered for possible government intervention?

While there was support for the introduction of measures to address items such as single-use plastic straws and plastic-lined takeaway coffee cups, and packaging, it was mentioned that, before government intervention, functional and acceptable alternatives must be in place for consumers' use. These may include items produced and recycled using new formulations and technologies which are not yet well-known to those outside these industry sectors and new ways of offering items for sale.

"Basically anything, food wise, that is currently made from plastic or from Polystyrene, can now be made from PLA"xxi

"We would prefer to sell our product 'on tap' where customers bring back their glass jars for refilling... this would save us significant time and money in packing our product, and customers would benefit by getting the same product at a cheaper price and without the need to consume single use plastic. We find that most retailers are hesitant to try selling foods in bulk because they are not clear on regulations and do not have the set up required in store to accommodate products in bulk. I think you can assist by providing resources to businesses to help transition to the ideal elimination of single use plastics by enabling customers to buy in bulk" xxiii

Where answered, the additional plastic items nominated by these Industry and Business Stakeholders were:

- Straws
- Stirrers
- Shopping bags
- Styrofoam
- Disposable coffee cups
- Plastic cups and plates
- Cutlery
- Cotton bud sticks
- Fast food wraps
- Home delivery packaging
- Film wrap
- Mailing satchels.

Government support for organisations seeking to start-up new, environmentally-friendly materials manufacturing or post-use processing and reuse etc. was requested and recommended to develop these early-stage initiatives and solutions.

3.2.1.8 What are your views on the list of items excluded (see page 30) and do you think there are others that do not require additional action or should be exempt from possible government intervention, and why?

Are there inclusions that should be excluded? Why?

Where addressed, there was agreement for this process to proceed with the recommendation that banning or restricting the supply of these (and similar) items (refer page 30 of discussion paper) should be considered with possession of all facts and in consultation with informed parties.

Frequently mentioned categories of exception to any form of ban or reduction in access were items for medical use and those employed by people living with disability.

"Single-use plastics are necessary in the health industry and even in the disabilities/aged care sectors, particularly hygiene products and sterile packed surgical items"xxiii

Any examination of the items to be included and/or excluded should take new technology into account; some items have traditionally not been able to be recycled and/or reused but new technology and patented processes offer ways to overcome these challenges.

It was further recommended that time is taken to develop a national definition of the terms employed to define inclusions and exclusions is developed, e.g. "problematic", "unnecessary", "single-use plastics"

"... a national definition is required to remove any ambiguity and to ensure any measures that are considered do not have unintended consequences for the community"xxiv

Where addressed, the following items/categories were suggested for exclusion from Government intervention (by some stakeholders and not supported by others):

- Microplastics
- Sea-based debris
- Those described (variously) as non-plastic single-use products, e.g. beverage containers, sanitary and hygiene products, balloons, cigarette butts
- Thicker plastic bags

"The new, thicker bags introduced by a number of retailers are designed for continued reuse, so should not be considered part of the 'single-use plastic' category'"xxv

Feedback was also received on the topic of enabling collaboration towards developing this list of inclusions and exclusions and the manner in which it is to be implemented at the industry level and point of sale, in the future.

3.2.1.9 Do you think that labelling describing how to recycle or dispose of a product, or parts of the product is helpful to consumers?

For which products would better labelling enable better disposal?

Where addressed, feedback on this question supported the provision of descriptions for the correct disposal of packaging and content.

The Australian Recycling Label (ARL) was mentioned as an initiative providing "a source of separation instructions and products recyclability based on Australian MRF's" At the time of this consultation, the ARL was in the process of being implemented across industry channels and it has been recommended that evaluation is deferred until "consumers are more familiar with the redesigned label" **xxviii**

"Yes. The ARL will help consumers to better separate packaging into correct streams and therefore improve recycling capability" xxviii

In addition, the process of preparing for their labelling changes will serve to increase manufacturers' awareness and knowledge of the components and sustainability of their own packaging (and possibly, encourage improvements in that area).

"This should also prompt companies to start (a) conversation internally to improve the recycling status of packaging material" xxix

One manufacturer requested support in driving mainstream awareness for the new ARL system. Another Stakeholder suggested the provision of a public-accessible website holding a centralised repository of the ARL information.

The development of new, unique recycling iconography was suggested by one Stakeholder to identify specific materials at the point of recycling processing, e.g. visually and electronically to increase productivity and effectiveness of sorting and recycling.

3.2.1.10 Feedback specific to South Australian manufacturers and importers

Those submitting responses were asked: "If you are a South Australian based manufacturer or importer of any of the single-use plastic products mentioned in this discussion paper, what are your views on this topic? Do you have access to alternatives? Are there cost impacts that need to be considered as part of the discussion?"

Where addressed specifically, this question raised the concern for costs of transforming one's operations and addressing the changes that may result from the reduction of single-use plastic products. These areas are:

- Food safety
- Ease of use
- Transport
- Being fit for purpose, e.g. freshness, protected, sterile
- Affordability and cost minimisation
- Redeployment of, or compensation for, unused inventory of single-use plastic products
- Phase-out/phase-in costs
- Customer service costs
- Establishing new channels for supply/sales of exempt products

- Research and development of alternatives to single-use plastics
- Increased inventory costs due to more expensive alternatives to single-use plastics
- Increased waste management costs
- Compliance with government intervention
- Possible increase in costs of items included in the Container Deposit Scheme (or similar incentive-based initiatives).

While the consultation has yielded numerous examples of manufacturers' and importers' initiatives to transform their products' components and packaging, it is to be recognised that this is a costly exercise, with both positive and negative economic consequences in South Australia.

"For us, the impact would be financial. We have been researching and trialling home compostable packaging for the past two years; these products are three times the costs of our current materials"xxx

Costs increases can also be created through the process of change and undertaking consultation, change management, developing solutions and complying with industry and state regulations. For these to be minimised, a clear understanding of roles and responsibilities is to be developed, communicated and adopted thus avoiding replication and overlapping activities.

"Also, it would be helpful to spell out the roles and levers that various organisations have"xxxi

While every effort to avoid cost increases has been mentioned frequently by those participating in this consultation, the other side of the financial discussion are the recommendations for subsidies and grants which could be offered to organisations seeking to transform their operations to reduce the use of single-use plastic products, or start-up new solutions to the issues created by them.

The recommendation was for a continuing and expanded collaboration between industry and government in achieving sustainable outcomes over realistic timeframes. This includes a clear understanding of the activities currently underway within Australia and internationally, e.g. peak bodies' plans and strategies for reducing the use of single-use plastics across the nation.

"APCO's 2018 Working Groups have developed Gap Analyses that summarise recovery challenges and environmental impacts and inform the development of solutions associated with materials... APCO will make these learnings available to the South Australian Government to help inform its development of policies to address these issues' xxxiii

3.2.1.11 Feedback specific to South Australian retailers or other businesses

Those submitting responses were asked "If you are a retailer or business that sells, offers or provides single-use plastic products mentioned in this summary, what are your views on this topic?

"Any change in legislation needs to have wide level support and understanding by retailers and consumers"xxxiii

Where addressed specifically, those responding to this question mentioned the following:

- A need for clear, national definitions of "problematic", "unnecessary" and "single-use" for shaping future policies, guidelines and practices etc.
- Support for national consistency across jurisdictions for allowable and banned lightweight, single-use plastic bags, i.e. micron weight, material formulation, compostability, biodegradability, description, availability and exceptions to this/these
- Recognition of the challenges created when balancing the imperatives of consumer safety, product quality and performance with the need for environmentally sustainable packaging
- The need to have substitutes and alternatives in place before any intervention occurs
- Collaborating between sectors to increase recycling rates and reduce environmental impacts of packaging

- Retail consumers require access to inexpensive, alternative bags at points of sale when they
 have forgotten their reusable ones, e.g. thicker plastic, recycled materials
- Since 2009, retailers have been challenged to reduce the effects of single-use plastics and this has resulted in many innovative practices and the need for the development of a consistent approach across jurisdictions
- Further bans of single-use plastic products in South Australia are forecast to increase consumer inconvenience and costs and this will impact their retail relationships. Retailers request time and notice to transition their operating models to accommodate these impacts
- The potentially increased cost (time, money, knowledge, capacity) of regulatory compliance will require support for retailers, particularly the "tens of thousands of small or franchised retail businesses across South Australia" vxxxiv
- Additional education for the retail sector will be required in the event of new regulations to assist in creating awareness and driving compliance
- Gaining information and direction from Queensland's voluntary approach to the reduction of thicker plastic bags
- Working with the retail sector to test compostable and other alternative plastics
- All progress towards regulatory and/or behavioural changes in the employment of single-use plastics must take standard retail timelines into account, being a minimum of 18 months.
 Other phase in/phase out implementation timelines mentioned ranged from 3 months to 5 years.

"The problem is urgent, but some lead time is clearly needed"xxxv

"90% of businesses who responded to our survey would like to see a transition away from single-use plastics within three years" xxxvi

"Retailers require 18 months to implement any new policy due to existing stock levels, current contracts and the procurement process. This also allows sufficient opportunity for an educational campaign to inform consumers of any impending change "xxxvii"

- There may be a requirement to provide for exceptions to Phase in/Phase out and implementation timelines, specific to industries experiencing challenges to the timely and affordable transition to alternatives to single-use plastics
- Increasing requests to provide more environmentally-friendly products from customers
- Increasing appetite among the business sector to use recycled plastic if it were more readily available.

3.2.1.12 Feedback surrounding consumer impacts

Those submitting responses were asked "as a consumer of single-use plastic products mentioned in this summary, what are your concerns? What would you like to see done to address the problem(s) or concern(s)?".

This section of the industry and business feedback did not attract many specific responses, although there was concern surrounding the effects of cost increases to consumers as a result of phasing out single-use plastics.

"Increased cost pressures facing the community are to be avoided or minimised" xxxviii

It was also pointed out that the ARL will assist consumers' education address a few of their concerns.

A need for more dedicated coffee cup collection points is required, along with further education in this area

Retailers did point out that consideration should be given to the changing shopping behaviour of today's consumers, moving from a big, weekly shop to multiple smaller shops at the end of a work day or in between study and parenting tasks and the impacts of this on the use of plastic products.

3.2.1.13 Do you think government intervention is required in relation to single-use plastic products or other single-use items? If so, what type and in what timeframe?

"Businesses already face high costs... and other administrative burdens... While support is there for action to combat single-use plastics, any government intervention needs to acknowledge such barriers" xxxix

The business and industry stakeholders were divided in their support for government intervention to achieve reduction of single-use plastics products. Of the 24 submissions received from the stakeholders in this group, 8 specifically stated they did not support a ban and/or further government regulation to reduce single-use plastics. These organisations preferred self-regulation or reliance upon market forces to determine supplier and consumer behaviour. Others were in favour of intervention, especially if it could be enacted nationally or with national consistency.

"... States and Territories can provide policy and legislative frameworks that will support industry to transition to a circular economy ..." $^{\rm xl}$

"By introducing legislation the government will simply be providing the final additional push that industry need (sic) to switch to more sustainable packaging options. This is difficult for a single operator to implement when competing with many other retailers, but if the whole state shifts at once, no business is unfairly penalized"xli

"A national collaborative stakeholder approach is required"xliii

In summary, the positive aspects of government intervention were perceived as being:

- Ability to focus significant state resourcing towards resolving areas of the greatest environmental concern caused by single-use plastic products
- Access to clear national and state legislation and public policy-making to accelerate behaviour change and impact, along with enforcing compliance
- Collaboration with other State Governments and federally, to achieve uniform outcomes across Australia
- Ability to provide incentives (e.g. grants, subsidies, tax breaks) to improve manufacturing, recycling and communications outcomes
- Mandating change across South Australia at the same time, thus avoiding inequality of penalisation
- Industry growth, e.g. recycling, manufacturing, packaging etc., providing investment and jobs growth
- Ability to influence the behaviours surrounding disposal of single-use plastic products, which could significantly reduce the environmental impact
- Ability and resources to work with both industry and consumers to resolve the issues created by single-use plastics, e.g. effective national plans which can be implemented at state/territory level
- Social and environmental procurement activities to set good examples and build suppliers' capabilities and capacities
- Global collaboration opportunities to resolve the pollution in international waters and other countries
- Creation of mass-communications to educate and influence attitudinal and behavioural change, e.g. manufacturers, retails, consumers, industry sectors, national, internationally
- Sponsorship and arrangement of international study tours and collaborations to grow domestic knowledge, capacity and practice
- Possessing a "big picture" view of how the single-use plastic product debates and actions overlap and influence other areas of public policy, social purpose and population management, e.g. Container Deposit Scheme, food waste, economic development, protection of vulnerable people, education, taxation etc.
- Affording the resourcing and motivation to consider the long-term effects of policy-driven interventions, e.g. the effects of substitutes over decades, supply chains, end-to-end lifecycle costs and consequences etc.
- Access to Local Government for influence and collaboration, including social and environmental procurement

- Able to take a whole-of-supply-chain-approach to reduce the impacts of single-use plastics and develop closed loop systems
- Opportunity to increase ban(s) to include heavier weight bags, 'compostable' 'degradable 'and 'biodegradable' bags across multiple jurisdictions
- · Opportunity to remove (or add) exceptions to bans, e.g. for people with special needs
- Government has the authority to mandate transparency of information provided by bag suppliers to allow retailers to make informed purchasing decisions
- A ban can be enacted across a wide range of products and materials, to ensure that the desired outcomes are achieved
- The authority to enact a holistic approach, combining change management strategies and activities directed towards different targets and outcomes, e.g. regulation, education, incentives, research and development, recycling, procurement etc.

"A voluntary approach in the first instance is preferred including a comprehensive education and awareness raising strategy aimed at both businesses and customers'xliii

The arguments against government intervention are summarised as follows:

- Increase in costs to manufacturers and retailers, and ultimately to consumers. There are no known plans for funding the cost differences and this will/may result in lost jobs in South Australia (both currently and with effect on future growth)
- The current lightweight shopping bag ban is sufficient, and has achieved significant use and litter reduction and there is no need to extend this to thicker bags and/or other products
- Concerns for groups with specific needs for single-use plastic products, such as medical users and the people living with disability
- Fear of resulting in state-by-state approach rather than a national one, leading to inconsistencies, lack of clarity and complex administration. More state-based legislation and regulatory actions will only serve to confuse this more
- Preference for industry self-regulation, led by a representative body, avoiding the need for government intervention. The example given is APCO's directive "to lead the whole-of-supply-chain project to develop the National Waste Policy Implementation Actions Plans that include plans to phase out problematic and unnecessary single-use plastics by 2015"xliv
- Unachievable objectives and timeframes, which may lead to non-compliance and poor implementation
- Unclear regulations, leading to confusion and loss of Key Performance Indicators
- To date, there has been insufficient information-gathering, consultation and debate to progress on decisions at government levels
- Voluntary approaches to addressing issues created by single-use plastics create new opportunities, competitive advantages and rewards for early adopters and innovators.
 Mandating regulatory compliance removes these benefits and can have a stifling effect on innovation
- This leadership is the role of peak bodies and industry leaders, who are already researching and recommending beneficial ways of meeting the challenges of single-use plastics
- Lack of adequate waste management systems will create failure of any intervention attempts by government.

3.2.1.14 Additional suggestions for the future management of single-use plastics from the business and industry sector

Different stakeholders provided different suggestions for the future management of single-use plastics in South Australia, not captured in the previous points. A summary of these follows:

Transition to recycled/recyclable/reusable materials

Increasing the knowledge and availability of a range of component and packaging materials will be of benefit to the environment, along with meeting increasing consumer demand. These

could include different stages of the circular economy such as: recycled materials, recyclable materials and those which could be repurposed after original use.

Widespread information campaigns to increase awareness of the uses of recycled plastic products

A lack of awareness of the benefits and uses of recycled plastics may result in new motivations to reduce the use of single-use plastic products, improve waste management, increase recycling and procure more recycled products in the industry and business sectors, according to one peak body.

"Improved communications on how plastic is recycled would hopefully increase recycling efforts by industry & users of single-use plastic. A good news story!" **Iv

Consumer and retailer education

Within these submissions, there were many references to the need for increased consumer and retailer education in the following areas:

- Litter reduction
- Correct waste sorting and disposal
- Clear explanations of any changes to current regulations
- Costs of providing reusable and environmentally-friendly alternatives to single-use plastics.

International aid and education

Australia is not the only source of plastic pollution, and it was suggested that Australia could work with other countries to collaborate on the reduction of this global issue.

3.2.2 FEEDBACK FROM LOCAL GOVERNMENT STAKEHOLDERS

Responses to this consultation were received from the following Local Government organisations:

- City of Adelaide
- The Barossa Council
- City of Campbelltown
- City of Holdfast Bay
- Local Government Association of South Australia
- City of Marion
- · City of Mitcham
- City of Port Adelaide Enfield
- City of Prospect
- City of West Torrens.

3.2.2.1 Do you consider single-use plastic bags are causing environmental problems?

All responses considered that the evidence supports the conclusion that single-use plastic bags are causing environmental problems at all levels of their lifespan, e.g. resourcing, manufacture, use and disposal.

"Yes. The evidence is overwhelming"xlvi

"Recycling alone will never stem the flow of plastics into our oceans; the production of all this plastic waste needs to be slowed down as the sources with legislation and regulation"xlvii

"Single-use plastics are considered to be the cause of major environmental problems in our aquatic environments. This is evidenced by numerous statistics from a global and national context"xlviii

With usage of these items on the increase, it is often, or usually, a Council's role to remediate this litter and the damage it causes. This is increasingly costly, time-consuming and creates further problems in many other areas of Local Government, e.g. waste management, communications, policy, OHS&W etc..

"Due to the high plastic content of captured debris (following a high rainfall), all materials recovered during the clean-up was (sic) required to be disposed as waste to landfill, rather than diverted for recycling at a compost facility. The total clean-up cost, including waste disposal was \$53,000"xlix

3.2.2.2 What do you consider to be the most important problem associated with single-use plastics that needs to be addressed?

The most frequently mentioned opportunity for tackling Australia's single-use plastic waste problem is to engage at the front-end of the process of making decisions surrounding the components of manufactured and packaged products, rather than at the waste disposal end of the journey.

"The National Waste Policy should incentivise engaging with the circular economy from both angles – by both encouraging the production and consumption of circular-use products and by discouraging the production and consumption of linear-use products"!

There was a call for timely action in this area, to minimise the rate at which environmental harm is occurring.

"Sustained accumulation of single-use plastics as litter in SA will increase if not properly managed and environmental pollution is going to be detrimental to human mental health and wellbeing".

The following items and/or categories were forwarded for consideration as being the most important problem(s) to be prioritised:

- Stemming the increasing numbers and variety of single-use plastics
- Consumer goods packaging (or "over-packaging")
- Items for which there are no methods of safe, environmentally-friendly disposal or recycling
- Simplifying the ways that consumers and industry can responsibly and correctly dispose of their waste
- Synergise consumer, municipal, public place and commercial recycling and processing actions
- Plastic straws
- Microplastics in the food chain
- Lack of industry regulation
- Litter
- Low biodegradability and non-compostability
- Oceanic accumulation of plastics
- Landfill overflow
- Items designed only for single-use
- Items creating the most harmful environmental impacts
- Items selected via a consultative process between government and stakeholders
- Consumer education to support behaviour change
- Reduction of production and consumption of single-use plastic products
- Increasing the economic value of recycled plastics, creating new markets
- Increasing Australia's capacity to recycle plastics
- Supporting the development of the circular economy
- Improper disposal of items, leading to plastics in waterways and landfill.

3.2.2.3 What are your views on extending South Australia's ban on lightweight single-use shopping bags to include thicker plastic bags?

What would be the consequences of such action for the community, businesses and the environment?

All Councils and the Local Government Association of South Australia supported this extension, while acknowledging it may require a period (e.g. by 2025) of initial adjustment and consultation to determine optimal phase-out timing.

"Initially a financial burden may be felt by customers until they were habituated to bringing their own bags^{*lii}

"Consumers aren't going to stop shopping simply because disposable carrier bags aren't available" liv

Matters related to this outcome were also discussed and have been summarised as follows:

- Consumers will require support to effect comprehension and behaviour change
- Providing alternatives at point of sale and for reuse, for even the most conscientious of shoppers
- Online retailers will need to change packaging
- Proof for this extension is available through waste audits, which show widespread disposal of under-used thick plastic bags
- Evidence in support of the State's ability to adapt to such a change is available through the results of the 2008 ban on lightweight bags (in South Australia)
- There are retail chains/stores already employing non-plastic bags, providing alternatives to their customers
- Supporting transformation activities, and achieving economies of scale in waste and manufacturing sectors

- Preventing cost increases being passed on to consumers
- Lightweight produce bags should also be considered for inclusion in this extension
- Bans will directly reduce the supply of plastic and littering
- Supporting recycling and the purchase and use of recycled plastic products
- Extending this ban will also reduce the harmful outputs of manufacturing these items, e.g. carbon emissions, use of non-renewable resources
- Defining the items to be included (and exempted) from this proposed ban
- The problems associated with Councils' increasing waste disposal costs.

To ensure that the consequences of these changes were identified and managed, the following advice was given:

"A comprehensive and fully funded transition strategy is supported as this would:

a enable flexibility and consumer choice b bring forward product substitution c encourage reuse, including swap and go' schemes d stimulate and support South Australian product and business innovation e incentivise formal and informal resource recovery including litter, and f improve consumer labelling."

3.2.2.4 Should all checkout bags and produce bags (i.e. for grocery items) be made from compostable (Australian Standard 4736-2006) material?

What would the impacts be for retailers, consumers and industry? Would there be demand and flow-on benefits in establishing new industry to produce compostable bags here in SA?

Those Councils and Association supporting this initiative gave the following reasons:

- They are an environmentally-friendly, convenient alternative to plastics
- There are ways and means for effective composting
- Reduction in contamination of the green waste stream and improve recycling outcomes
- Compostable produce bags can be reused for food waste disposal
- Creation of economic growth through innovation, new industries, local jobs, procurement and capacity-building
- There is opportunity for South Australia to lead the way in development of compostables via the establishment of a national centre of research/policy/certification etc.
- An environmentally sustainable action that will reduce the impacts of plastics to the natural environment and human health
- Simplify/remove user confusion
- A staged approach to transitioning, focusing upon the food retail sector would accelerate resolution single-use plastics issues
- This can include a range of materials including uncoated papers/boards, bamboo, bioplastic, cotton, etc.

"Legislating the use of compostable bags in supermarkets and reducing the use of unnecessary plastic packaging would result in significant community savings through landfill diversion and also improve environmental outcomes" tvi

"The result of the trial in the City of Holdfast Bay showed that customers embraced the use of these bags and subsequently used them for the disposal of food waste in the green bin'tvii

"... consideration could be given to the establishment of a national compost research, development, and product certifications centre" deviii

Issues with the use of compostable bags were acknowledged as being:

- Problems with strength and durability, initially and over time
- The requirement for consumer education surrounding the use and disposal of compostable items

- Confusion over labelling of compostable (vs. degradable etc.)
- Inconsistent availability of composting via kerbside collections
- Increased cost of purchase to the retailer and the consumer, possibly requiring compensation to smaller operators
- Use of primary resources during manufacturing
- Not appropriate for all uses
- Bamboo and paper (and other materials) are not covered by the Australian Standard 4736-2006 and this will need to be reviewed as other compostables are introduced..

3.2.2.5 What do you think about the idea of banning lightweight single-use shopping bags even those made from biodegradable, degradable or compostable substances as has been proposed in other Australian jurisdictions?

Support for increased regulation and/or a ban was articulated:

"Carry bags and produce bags made of conventional, biodegradable (oil-based) and degradable plastic should be regulated and removed from South Australia's waste stream by 2020, as part of a comprehensive and fully funded systems-based transition strategy" him.

Support for the introduction of compostable bags was conveyed, particularly for reuse as food waste bags. In many locations, these can be used for multiple purposes and disposed of via kerbside green waste collections.

"South Australia has the capacity to expand into the compostable bag industry which will support some single-use plastic bags (fresh produce, deli, and butcher bags) being replaced with compostable but should not include all bags."

"As a Council, we believe our community use their biodegradable and degradable shopping bags in a variety of ways" txi

In other Council areas, it was preferred that these items were deposited in the soft plastics recycling bins at supermarkets or into their household waste bin (i.e. red or blue lids) to reduce the risk of contamination in other waste streams.

"This issue could easily be addressed by the banning of biodegradable plastic bags, which would make it easier for both the individual trying to recycle correctly and the composting business which is receiving the organic waste material for composting "txii

Bags which are biodegradable, oxo-degradable and/or degradable were acknowledged for being problematic due to their eventual creation of smaller pieces of plastic entering the environment and it was frequently recommended that they are banned.

"We are supportive of banning of all types of single-use shopping bags if they are made from degradable or biodegradable plastic materials" shift materials.

In addition, Councils expressed concerns over the confusion existing among householders who do not distinguish between these descriptions and types of materials and, as a result, are inadvertently contributing to environmental harm. Along with recommendations for banning the non-compostable items, the development of education campaigns and a mandatory certification for compostable products would assist in clarifying the difference in these bags.

3.2.2.6 Do you think South Australia should introduce measures to address items such as single-use plastic straws and plastic-lined take away coffee cups?

What other single-use plastic items or single-use products would you like to be considered for possible government intervention?

These Councils and Association supported the introduction of measures to address and reduce single-use plastics because:

- Alternatives are widely available
- They are unable or unlikely to be recycled
- A systems-based response will/should provide clear, flexible and justifiable criteria for inclusion, actions, policy and legislative responses
- There appears to be significant public support for this initiative
- The process will/should involve widespread consultation with key stakeholders
- It may/will provide a long-term solution
- It may/will consider voluntary codes of practice along with bans and restrictions
- The process will/may consider the establishment (leading to economic development) of associated systems to support accreditation, procurement, policies, composting etc.
- It sets a positive example across the state.

"Council is embracing its leadership role in this space and is currently exploring the idea of prohibiting the use of straws and single-use food packaging and utensils at Council licensed events. Hence, Council is extremely interested to see how the State Government addresses this waste problem and might implement statewide (sic) solutions "Axiv"

"These initiatives have been well supported by event organisers, catering companies, and welcomed by the community" vv

Single-use items specifically mentioned for addressing, were:

- · Fast food drinking containers, either plastic or plastic-lined, with plastic lids and straws
- All polystyrene products
- Coffee cups, lids
- Chip and ice cream cups (plastic lined)
- Takeaway food containers
- Cutlery (including ice cream spoons/paddles), stirrers
- Plates
- Produce trays: styrofoam and plastic
- Straws
- All types of plastic bags
- Bottle caps
- Balloons and sticks
- Glow sticks
- Soy sauce fish-shaped bottles
- Microbeads and microplastics
- Cotton buds
- Water bottles
- Cling wrap/plastic wrap
- Beer/six pack rings
- Tea bags
- Chewing gum
- Single-use food/lolly wrappers
- Cigarette butts
- Makeup or face wipes/baby wipes/sanitary wipes/flushable toilet wipes
- Single-use cleaning cloths/wipes
- Medium plastic packaging
- Soft plastic packaging
- Absorbent hygiene products, e.g. disposable nappies
- Foil-lined tetra packs
- Fishing gear
- Cable ties
- Plastic wrapping used in the building industry.

3.2.2.7 What are your views on the list of items excluded (see page 30) and do you think there are others that do not require additional action or should be exempt from possible government intervention, and why?

Are there exclusions that should be included? Why?

Some of these Councils/Association supported the removal of all listed items. Others suggested that the additional following items/categories should be excluded in future lists to the considered by State Government:

- Sanitary wipes/towels
- Marine derived plastic waste, if addressed through another investigation/process
- Items for which there are no viable alternatives
- Items to be addressed via Australian government intervention, e.g. microbeads, microplastics
- Items to be included in the Container Deposit Scheme
- Compostable items.

It was suggested that the following items/categories **should** be included in future consideration by State Government:

- Items made from plastic or predominantly plastic and is designed for disposal after a singleuse^{|xvi|}
- Non-recyclable/compostable dog waste bags
- Microbeads/microplastics
- Flushable toilet and bathroom cleaning wipes
- Debris and equipment from fishing-based activities
- Tools and strategies for litter enforcement action
- Zero Waste events for State and Local Government activities
- Activities occurring in other jurisdictions, with similar objectives
- Curbing excessive and non-recyclable packaging
- Grant funding to build SA's compostable industry
- Support for building market opportunities for recycled products, e.g. road bases, public furniture
- Subsidies (temporary) for cost-differences during transition and transformation periods
- Range, locations and availability of recycling drop-off points
- Incentives for Local Government to increase social procurement, e.g. reduction in waste levy
- The needs of organisations, individuals and the supply of items required for medical, aged and disability use.

"Council recognises some community members have a requirement for straws for medical reasons" txviii

It was mentioned that achieving a reduction in use of some items may require a range of different strategies, apart from regulation, e.g. consumer education.

3.2.2.8 Do you think that labelling describing how to recycle or dispose of a product, or parts of the product is helpful to consumers?

For which products would better labelling enable better disposal?

Although there were mixed responses to this question, it was generally agreed that labels play a significant part in the waste management process.

"Council would like to see an improvement on labelling and education across the sector to remove the confusion associated with single-use plastics' txviii

"Yes. Labelling describing how to recycle or dispose of a product, or parts of the product, is helpful to consumers "*xix"

"... a simplified labelling system is required that aligns with Australian Standards colours for waste streams and South Australia's 3 bin system..."

While all activities designed to provide clarity and information to consumers were generally supported, this question has highlighted issues relating to the inconsistency in recycling and waste management across Council jurisdictions and therefore, it is not possible to standardise product labelling across all single-use plastics.

"Not all jurisdictions recycle the same items" 1xxi

It was pointed out that standardising this approach would be challenging because some items do not carry labels, some are very small and so forth.

"Yes, however based on the varying sizes and shapes of single-use plastics, this could be very difficult to implement' txxii

In addition, there is a need to overcome existing confusion relating to current labelling, iconography and householder attitudes before considering the effect of changing labels.

"Any product which is recyclable or compostable requires better labelling to ensure effective resource recovery. Labelling bags as biodegradable has not assisted with correct disposal" txxiii

"Poor consumer labelling currently detracts from customer experiences..." "Axxiv

One Council suggested the increased use of the "seedling logo" on certified compostable products to increase community education.

Others suggested the introduction of "standard and clear graphics on plastics and plastic substitutes (compostable)" to educate and assist consumers.

"... such as a Red Dot, Green Dot, Yellow Dot system on the base of containers, or the use of the same colour system on the 'universal recycling symbol" fxxvi

A third suggested that future labels include reference to household bin lid colours, matching the waste components to the colours of the lids of the bins in which they should be deposited.

Ideally, recycling should start at the point of manufacturing, where all items are made from the same materials and/or to recognised specifications which can be recycled or reused with ease, both by householders and the Waste Management Industry. A national approach to this was also proposed.

"We are (in) support of better product labelling that is clear and consistent and wish to see the Australian Packaging Covenant Organisation with Planet Ark and PREP Design be compulsory to all product not only in South Australia but also nationally "txxviii"

"It is hoped that this labelling will appear on enough products to sufficiently educate the community about the correct disposal of recyclable items" taxviii

In addition to labelling, it was recommended that a greater focus is placed upon providing more education and information relating to waste management across all relevant sectors and in particular, to householders. It was mentioned that the Discussion paper omitted significant information which would assist in providing this transparency and motivation towards effective household waste management.

"There is generally a low level of understanding by the community of the waste and recycling industry in Australia and consideration needs to be given to how this can be improved" txxix

Areas to be addressed in future discussion papers and responses include:

- Definitions of types of plastics and their recyclability
- Differences between rigid and soft plastics
- Explanations of the factors affecting recycling in SA

- Uses for recycled plastics
- Substitutes for plastics and their pros and cons, etc.
- A standardised iconography and wording (preferably adopted nationally) to align labelling.

3.2.2.9 Feedback surrounding consumer impacts

Those submitting responses were asked "as a consumer of single-use plastic products mentioned in this summary, what are your concerns? What would you like to see done to address the problem(s) or concern(s)?".

Most of these Councils and the Local Government Association addressed this question from the viewpoint of their own consumption of items during their day-to-day operations. This was mentioned to illustrate their commitment to social and environmental procurement, with an emphasis on reducing their own use of single-use plastics, while encouraging community members to follow suit.

"For example, we have been purchasing alternative(s) to single-use plastic catering items for several years and are working on improving our procurement on going 'lxxx'

"... distributing waste reduction resources on social media platforms, banning bottled water at Council meetings, developing waste resources to reduce bin contamination, conducting 'Waste Talks' and availing 'Straw No More' posters to the business community to encourage them to take the pledge to reduce plastic straws'*xxxi

"The Council ban was adopted as a Guiding Principle in August 2018, however state-wide legislation is essential to expanding the ban more broadly in the community and providing greater consistency and certainty to businesses, so they can plan ahead and face similar requirements regardless of which Local Government Area they are servicing *txxxii

It was mentioned that some consumer experiences highlighted the need for additional education among retailers so that they can learn more about how to reduce their use of single-use plastic product and provide multiple benefits.

"Some businesses refuse to serve items in consumers' reusable cups without good reason" **exxiii**

3.2.2.10 Do you think government intervention is required in relation to single-use plastic products or other single-use items? If so, what type and in what timeframe?

These Councils and Local Government Association supported government intervention in this issue, with the following rationale:

- To accelerate consumer preference for environmentally friendly alternatives to single-use plastics
- To extend South Australia's leadership in this area
- Because it has worked in other jurisdictions and overseas
- Because the environment needs protection
- To accelerate the cessation of environmental harm
- Can work closely with industry and businesses, collate information and translate to policy and regulatory actions
- Ensure a ban is socially, economically and environmentally sustainable prior to enactment
- Securing the availability of alternative and substitute items.

"Time is of the essence" txxxiv

Areas requiring further consultation and development during the process of government intervention were mentioned as being:

- Phase-in/out time for single-use plastics, e.g. 6 months, 2 years, a range of different times for different industries
- The development of a range of tools, including regulation and/or legislation, community education and disincentives
- Investigation into the socio-economic impacts of intervention and/or compensation
- Mandate that plastic straws are only available upon request
- Development of additional activities to reduce environmental impacts of packaging
- Strategy for reducing waste export
- Investigation of rationale behind some forms of packaging, e.g. single-serve biscuits, plastic travs for biscuits
- Investigation into the risks surrounding reuse of food and beverage containers. Possibly the development of standards surrounding this to protect all parties
- Transforming operations of businesses with single-use plastics at the core of their model; supporting them to change to a sustainable model or exit the market
- Developing Resource Recovery and industry development models for community benefit.

Another area attracting frequent mention was the concept of State and Local Government-run public education campaigning to increase consumers' awareness and knowledge surrounding the issue of single-use plastics specifically and waste management generally.

"Actively encourage, promote and incentivise the use of reusable single-use plastic alternatives such as reusable coffee cups, reusable straws, reusable fresh produce bags and cloth nappies, through a state-wide community engagement campaign based on social-marketing principles" xxxxx

3.2.2.11 Do you think restricting the sale or supply of some single-use plastic or other single-use products for which there are more sustainable alternatives is a good idea?

This proposed action received support among those Councils responding to this question and many provided examples where this was already occurring, e.g. food and drink businesses, public events, consumer behaviour, etc.

"Council supports the restriction of single-use products with alternatives. Large scale progress will only occur through legislation and policy" **txxxvi*

3.2.3 FEEDBACK FROM WASTE AND RESOURCE RECOVERY STAKEHOLDERS

Responses to this consultation were received from the following Waste and Resource Recovery Stakeholders:

- Adelaide Hills Region Waste Management Authority (AHRWMA)
- Australian Council of Recycling (ACOR)
- Closed Loop Environmental Solutions
- East Waste
- Fleurieu Regional Waste Authority
- LF Jeffries Nominees Pty Ltd
- National Waste and Recycling Industry Council (NWRIC)
- Northern Adelaide Waste Management Authority (NAWMA)
- Peats Group Ltd.
- Reloop Pacific
- Waste & Recycling Industry Association (SA) (WRISA)
- Waste Management & Resource Recovery Association Australia (WMRR).

Similar to the responses from other sectors, some of these stakeholders provided feedback as it directly related to the questions posed in the discussion paper, while others submitted theirs in a different, written format.

3.2.3.1 Do you consider single-use plastic bags are causing environmental problems?

All of these stakeholders confirmed that single-use plastic products are causing environmental problems in many ways, resulting from both direct and unintended littering, use of scarce resources and a growing tendency towards over-consumption.

"The environmental damage occurs as a result of direct littering habits, but also unintended littering with material escaping household and public place waste bins, transport processes, community events, poorly managed sites, transfer stations, processing facilities and landfills' txxxviii

"Single-use plastic products are clearly causing significant environmental harm as proven by countless credible scientific studies undertaken worldwide over many years**

In addition, some of these stakeholders also mentioned the issues that single-use plastics are creating within recycling processes.

"The annual cost ... for disposing of contaminants that largely includes single-use plastics is in excess of \$500,000'**!xxxix

3.2.3.2 What do you consider to be the most important problem associated with single-use plastics that needs to be addressed?

There were some different opinions of the most important problem within these submissions, summarised as follows:

- Reduction of the volume of single-use plastics being produced and in use
- Contamination of kerbside collected recycling streams
- Impact on marine life
- Limitations on the long-term viability of the organics circular economy
- Microplastics entering the human food chain, and detrimental impacts on health
- Resolving the ability to collect, sort and recycle single-use plastics due to material type, contamination and lack of markets
- Shifting the focus from "throw away" to re-educate, reuse and redesign

- Consultation with consumers and industry stakeholders
- · Examinations of incentives and rewards for changes in behaviour
- Compromised opportunities for recycling plastics due to contamination, e.g. food, different polymers
- Lack of regulatory controls and enforcement over single-use plastics.

"The paradigm around single-use plastics is the most challenging aspect that requires addressing, in that it can drive both poor consumption and generation behaviours. Education and messaging around this issue need to clearly question the need for such plastics, encourage avoidance, and promote design that leads to reusability of existing single-use items'*cc

3.2.3.3 What are your views on extending South Australia's ban on lightweight single-use shopping bags to include thicker plastic bags?

What would be the consequences of such action for the community, businesses and the environment?

These stakeholders supported the extension of South Australia's ban on lightweight plastic bags to include those of heaver materials.

"... people have simply replaced the use of light plastic bags with heavier ones" xci

"They require significantly more resources to produce, and by volume per bag produce significantly more harmful micro plastic particles" scill

There were some concerns surrounding the implementation of this proposed ban, with questions to be addressed as follows:

- A requirement to ensure alternative bags are available before a ban. If plastic bags are to stay, then only clear LDPE bags should remain
- The need for extensive consultation with industry stakeholders to reach shared understanding of objectives, actions, options and implementation plans
- Consideration of compostable bags as an exemption to a "plastic bag" ban
- Planning for, and minimising, detrimental effects of such a ban on consumers at point of sale and using online channels
- Impact on retail profits (through sales of plastic bags)
- Planning for a spike in the sales of bin liners (and/or other products substituted by reused plastic bags)
- The need to implement a successful and motivating education campaign aimed at consumers and other users
- Motivating retailers to become early-adopters of this form of regulation
- Weighing-up the financial analysis from a consumers' perspective, e.g. savings in single-use bag purchasing, expense of purchasing compostable and reusable bags, cost of bin liners, waste management fees etc.
 - "... there should be an exemption allowing the use of re-usable 100% non-toxic, plant based organic compostable bags"xciii

3.2.3.4 Should all checkout bags and produce bags (i.e. for grocery items) be made from compostable (Australian Standard 4736-2006) material?

What would the impacts be for retailers, consumers and industry? Would there be demand and flow-on benefits in stablishing new industry to produce compostable bags here in SA?

All but one of these stakeholders were also supporters of the use of compostable materials to replace single-use plastics wherever possible but acknowledging that there is further work to be done to ensure the successful development.

"With the current technologies available, there are very few single-use plastics that cannot be replaced with alternate packaging, legitimately recyclable materials or truly compostable materials, all of which can integrate into the circular economy" xciv

"These compostable bags have the significant advantage of breaking down completely into inert organic matter in the environment posing no threat to the environment or human food chain" vev

The advantages to South Australia in moving to compostable bags were stated as:

- Cost savings
- Industry and economic development opportunities
- Education and research opportunities. International partnerships with tertiary institutions and sector R&D leaders
- National and international recognition for leadership
- Ongoing usefulness in food waste management
- Decreased effects of plastic bags in the environment
- Offering a "middle ground" approach to enacting an outright ban of plastic bags
- The positive aspects of the "kitchen caddy" food waste trials, involving compostable bags.

Recommendations for the areas to be included in this future development are as follows:

- Materials research
- Ensure that there are no exceptions to this Australian Standard
- Financial analysis including costs of bags and costs savings realised through the implementation of compostable items
- Effect on the wider issue of food waste management
- Consumer behaviour research
- Retail industry consultation and problem-solving
- Consumer awareness and knowledge of compostables and their disposal
- Consumer confusion between degradable items and those which are compostable... and how
 to resolve this
- Development of sustainable procurement guidelines
- Consideration of presenting this initiative within the context of encouraging avoidance and reuse of items
- The manner in which these bags would be clearly labelled for users to recognise their purpose and methods of disposal
- Fit within the household caddy system.

The stakeholder in favour of banning all bags, including compostable ones, is seeking to change consumer behaviour away from excessive consumption towards a more mindful approach to resource management.

"Ideally, all checkout bags should be banned from use. Making these bags from compostable material would not eliminate their use and would encourage the 'throw 'away' mentality and linear model of consumption'"xcvi

3.2.3.5 What do you think about the idea of banning lightweight single-use shopping bags even those made from biodegradable, degradable or compostable substances as has been proposed in other Australian jurisdictions?

It was mentioned that householders reuse plastic bags in various ways around the home, although this does not occur everywhere and as often as is preferable. Uses include:

- Bin liners
- Clothes storage
- Food storage
- Travelling/transport
- Cleaning.

There was no support for the concept of banning compostable bags that comply with the AS 4736-2006. Those who mentioned them advocated for their increased use.

"All compostable bags must comply with the Australian Standard 4736-2006. Nothing else is acceptable "xcvii"

3.2.3.6 Do you think South Australia should introduce measures to address items such as single-use plastic straws and plastic-lined take away coffee cups?

What other single-use plastic items or single-use products would you like considered for possible government intervention?

Along with straws and coffee cups, there was support for other items to be considered for possible government intervention, if alternatives are available, as follows:

- Cutlery
- Cotton buds
- Plastic takeaway containers
- Fishing gear
- EU list (Top 10)
- Unnecessary packaged fruit and veg
- Stirrers
- Excessive packaging of consumer goods, particularly toys
- Consumable snack packaging
- Expanded polystyrene
- Sachets of sauce
- Helium balloons
- Balloon sticks.

Two of these stakeholders provided the case against the inclusion of plastic-lined beverage cups, arguing that they possessed the technology and processes to successfully recycle these. Both requested further investigation into processes and current successes before automatically intervening in the provision of these cups.

3.2.3.7 What are your views on the list of items excluded (see page 30) and do you think there are others that do not require additional action or should be exempt from possible government intervention, and why?

Are there exclusions that should be included? Why?

Additional items specifically mentioned by these Stakeholders were:

- All plastic-lined beverage containers (not just coffee cups)
- Expanded polystyrene (EPS) foam.

Recommendations for items to be specifically excluded from the Page 30 list in the Discussion paper were those which are:

- Compostable items
- Included within the Container Deposit Scheme
- Included within other recycling/reuse schemes and arrangements
- Plastic-lined cups which can be recycled by proprietary systems.

3.2.3.8 Do you think that labelling describing how to recycle or dispose of a product, or parts of the product is helpful to consumers?

For which products would better labelling enable better disposal?

There was widespread support for improved labelling on products, with the recommendation that this be undertaken collaboratively to achieve a consistent, national approach, and clarity of outcomes from a consumer perspective.

"Without doubt improved labelling is required to assist the community to better understand the recyclability of products they purchase" xcviii

"Our contribution to this is simplicity in the message, clear, concise and consistent labelling of all the items to allow correct recycling to be easily undertaken"xcix

The Australian Recycling Label being developed by the APCO was advocated for, with the recommendation that it also includes the percentage of recycled content on it. One stakeholder mentioned that labels (and/or the information they contain) appear on advertising materials to extend opportunities to learn about and be aware of components and disposal.

3.2.3.9 Do you think government intervention is required in relation to single-use plastic products or other single-use items?

If so, what type and in what timeframe?

Speaking as consumers of plastic products, it was noted that the current state of affairs is unsustainable and that changes are required to address destructive impacts on the environment and build cleaner, greener industries in South Australia.

"As a generalisation, industry will not move on eliminating single-use plastic products in the absence of a legislative intervention. It is doubtful that consumer purchasing choices will be sufficient to drive change and without either mandatory phasing out of single use plastics or a levy on single use plastics this issue will continue"

"Government intervention and leadership is encouraged as evidenced by SA's success in banning single-use plastic bags "ci

"A throw away mentality is ingrained and undoing that will require a considerable shift in thinking and behaviour by all parties" in

Different forms of government intervention, were proposed, along with recommendations for their investigation:

- Banning items for which viable alternatives exist
- Placing a levy on items for which there are no viable alternatives
- New waste collection facilities and arrangements
- Levies and/or taxes to discourage use of single-use plastics
- Product design interventions
- Developing a new packaging/product approval process to allow for expert input into whole-of-life resource management
- Product Stewardship or Extended Producer Responsibility (EPR) schemes
- Additions to South Australia's Container Deposit Scheme
- Ways and means of avoiding the sue of single-use plastic products, e.g. installing/funding more water fountains
- Labelling activities
- Awareness-raising and behavioural change campaigns directed at users, being households and businesses
- Industry-led voluntary self-regulation
- Social/sustainable procurement policies in Government, such as purchasing recycled plastics in roads and construction. Exemplifying this for adoption in non-Government sectors

- Staging roll-out plans developed with community input
- Facilitation and encouragement of "BYO Reusable Containers"
- Enforcement of alternatives to single-use plastics, e.g. compostable takeaway food containers
- Increasing the provision of appropriate and plentiful waste management systems/bins in public spaces
- Most appropriate timing, e.g. commencing in 2020, completed by 2025
- Mandating recycled content in plastic products

"Education is indeed important in the well-known waste hierarchy, i.e. encouraging first 'Refuse (sic), Reduce, Recycle' in priority'ciii

"It is seen as critical that all levels of government consult, inform and work with all the key stakeholders throughout this process and show leadership in the process of change"civ

3.2.3.10 Do you think restricting the sale or supply of some single-use plastic or other single-use products for which there are more sustainable alternatives is a good idea?

Again, these Stakeholders expressed agreement that this is a good idea although there was some cautionary advice on consideration of different viewpoints and consequences.

"Be wary of unintended consequences from any legislation and provide for appropriate exemptions, subject to the introduction of suitable alternatives, e.g. use of flexible plastic straws by disabled persons" v

It was suggested that the State Government collects information from the EU's most recent activities in managing single-use plastics.

Among the aforementioned positive outcomes from this proposed intervention are those which may promote the establishment of allied industries, resulting in economic growth for the state.

"We believe that it will have benefits in terms of litter, quality of recyclables presented through the kerbside system, and promote the establishment of a secondary remanufacturing sector in South Australia" vvi

It was also mentioned that the wider community, through various channels, is becoming more aware of issues relating to single-use plastic products and is seeking leadership and guidance from all levels of government.

"... these days, all levels of the community are more engaged in environmental matters and that there is a general desire of 'wanting to do the right thing'"cvii

3.2.4 FEEDBACK FROM NGOs AND SHARED INTEREST GROUPS

Responses to this consultation were received from the following NGOs and members of shared interest groups:

- Administration staff (waste management), City of Burnside
- A Simple Shift
- Australian Industrial Ecology Network Pty Ltd
- Boomerang Alliance
- Conservation Council SA
- Consumers Association of South Australia Inc.
- Eco Matters Queensland
- Environmental Defenders Office (SA) Inc
- The Friends of the Gulf of St. Vincent
- Good Design Australia
- SA Greens
- KESAB Environmental Solutions
- Loop Circular Economy Platform
- Low Waste Events and Education
- No Balloon Release Australia
- Public Health Association of Australia
- Sea Shepherd Australia
- Soroptimists International (Region of South Australia)
- Soroptimists International of Barossa Valley
- Tea Tree Gardens Residents Association Inc.
- Transmutation Pty Ltd
- Twenty Thirty
- Walk for Climate Change Action/Responsible Cafes in Mid North SA.

These stakeholders also provided their feedback in a variety of formats.

3.2.4.1 Do you consider single-use plastic bags are causing environmental problems?

All the stakeholders responding to this question concurred that plastic bags are causing environmental problems and threaten public health, along with a range of other effects and damage. Many provided references to the evidence of this conclusion. Others also added additional causes of this harm, e.g. all plastics (not just bags and those intended for single-use), consumer behaviour and consumerism, the lack of availability of alternatives, convenience, habit, economics, inability to act nationally and globally, methane, global warming/climate change, plastic toxins etc.

"YES. We agree and wholeheartedly support all referenced data presented in the discussion paper" to viii

"It is now obvious that this convenience has come at a significant cost to our rapidly deteriorating environment which demands positive and stringent action. Waste of all kinds is now a serious problem here and throughout the world" cix

"The European Commissioner for environment, maritime affairs and fisheries, Karmenu Vella said 'when we have a situation where one year you can bring your fish home in a plastic bag, and the next year you are bringing that bag home in a fish, we have to work hard and work fast" **

3.2.4.2 What do you consider to be the most important problem associated with single use plastics that needs to be addressed?

While all stakeholders agreed that single-use plastics were responsible for environmental problems, different individuals and organisations communicated different views of the priorities to be addressed, as follows:

- The "deteriorating environmental footprint"
- Inability of single-use plastics to break down into components or elements that add value to the soil, riverine or marine environments
- Inability to safely dispose of plastic products that cannot be recycled or repurposed
- Threats to animals
- Plastics entering marine environments and the resulting harm to marine life, and further consequences to humanity
- Litter and pollution
- Widely misunderstood role of design in preventing long-term consequences of production and use. Improving resource utilisation through design. Employing design to develop a circular economy
- · Landfill overflow, proliferation of products contributing to this
- Poor design throughout the product lifecycle
- Population growth and accelerating consumerism
- Inactivity by "developed economies"
- Development and availability of alternative, environmentally-sustainable products
- Threats to worldwide public health
- Resolving consumer confusion: what plastics can, or cannot, be recycled
- Resolving consumer confusion: accessing recycling systems
- Resolving consumer confusion: the differences between degradable, biodegradable and compostable materials
- Identifying and understanding infrastructure to separate different plastic polymers
- "Over" packaging of consumer products in plastic
- Convenience and availability/access to use collection systems
- Need for more education and industry action addressing community concerns
- Use of non-renewable fossil fuels, leakage and loss of materials and vital resources
- Lack of opportunities to reclaim materials and resources in Australia and overseas
- Closing the gap between the end "value" of spent resources and the costs associated with collection, separation, shredding, washing, drying, granulation etc.
- Developing value-added recycling options
- Applying a process of continuous improvement to the problem of litter created by single-use plastics
- Removing waste as an option
- Tackling single-use plastic litter specifically (and environmental waste, generally), beginning with the top items of snack bags, confectionary wrappers, takeaway cups and containers, packages and boxes, straws, bottle tops, clothing and packaging tape
- Creating and driving a Circular economy, e.g. by making all plastic recyclable, driving demand for recycled resources, setting-up systems for reuse, etc.
- "Driving change through creating a demand for innovative solutions whether they be in systems, material or behaviour" cxi
- "Collecting more data to improve understanding of the scale of the problem"cxii and to inform solutions and shape policy e.g. materials impacts on the environment, greenhouse gas production, clothes washing decisions, community sentiment and engagement in tackling these issues, product life cycles assessments (LCAs), resource usage
- Allowing people to BYO reusable containers
- Promoting and educating for a reusable social culture
- Improving Australia's labelling system, i.e. addition of seedling logo from the Bioplastics Association, wooden and bamboo product labelling, compliance with ACC regulations and the development of these
- Implementing a Food, Hospitality and Events Industry Reference Group to drive and support implementation of change

 Facilitating transparent reporting of food and organic waste collections and processing to enhance public support for the elimination of single-use plastics.

"Every piece of plastic we stop from entering the ocean is a potential life saved" cxili

"As products derived from fossil fuels, they add considerably to the carbon account" cxiv

3.2.4.3 What are your views on extending South Australia's ban on lightweight single-use shopping bags to include thicker plastic bags?

What would be the consequences of such action for the community, businesses and the environment?

There was unanimous, shared support for the extension of this ban.

"... the impact of the light weight shopping bags ban is diminishing, and people are returning to the bad old ways!" cxv

"Yes, yes, yes"cxvi

Many of these stakeholders provided additional advice to guide implementation:

- Adopt a holistic approach to banning, beginning by considering the way food moves through the value chain
- Develop clear standards and guidelines to ensure all intended bags are included in the ban. This will also acknowledge that exemptions will be required, e.g. medical packaging
- Clearly define the parameters of exemptions, e.g. bags over 70 microns thick
- Prepare for objections from the Business sector, based on commercial impacts and increased costs. Research the veracity of these claims in order to overcome them
- Focus on education to reduce consumers' demand for and use of unnecessary plastics, increase awareness of alternatives to single-use plastic products, promote social acceptance of alternatives and behaviour change
- Provide consumers with clear rationale for this change, e.g. personal community/environmental benefits, climate change action, carbon reduction
- Provide consumers with alternatives to current behaviour, e.g. use of personal shopping trolleys, compostable products, paper bags
- Consider whether compostable bags are, or are not, included in this ban
- Increase the price of thicker plastic bags to levels which reduce and/or deter purchase
- Plan to phase out within reasonable times, with the benefit of "fair warning" to all
- Educate consumers in the facts surrounding the environmental damage caused by heavier plastic bags
- Include "plastic barrier bags for produce" as well.

"The customer will get used to not having these thicker plastic bags just as they got used to not having them in the supermarket and took their own bags" cxvii

Opinions of the negative consequences of a ban are summarised as follows:

- Retailer (supermarket) objections due to loss of revenue from bag sales
- Requirement for reasonable phase out/phase in times to accommodate business timelines
- Retailers who may penalise consumers
- A ban (alone) may not achieve the desired outcomes and shift behaviours and could, in some circumstances, create a backlash
- Bans can inhibit the innovation of alternative solutions
- The need for education, retraining, managing change of behaviours for staff and customers
- Increased infrastructure costs
- Increased costs of bag stocks.

"Banning plastic bags alone will not achieve the outcomes required. ... a value must be applied to the plastics after their initial use. Ideally that value will be achieved through the

development of products, markets and technologies that 'value add' what is currently and generally without value'cxviii

Opinions of the positive consequences are:

- Provision of alternatives to plastic bags, which is already in evidence in the retail sector
- Consumer adaptability, recalling that humans survived without plastic bags in the past and can do so again
- Community collaboration and cooperation towards shared responsibility for problem solving
- Innovation and development of alternative products manufactured sustainably, e.g. bamboo, palm leaves, paper, compostable materials
- Increase in demand for alternative products, resulting in the achievement of economies of scale for entrepreneurial endeavours
- Increase in sector development and employment/job creation opportunities, e.g. waste collection, remanufacturing, processing, design, construction
- The community, as a whole, will experience benefit in many ways
- Minimal behaviour change required.

"The environment would be the biggest winner as it would save on significant resources that go into making plastic bags and would prevent plastic bags from becoming litter or needing to be disposed of "exix"

3.2.4.4 Should all checkout bags and produce bags (i.e. for grocery items) be made from compostable (Australian Standard 4736-2006) material?

What would the impacts be for retailers, consumers and industry? Would there be demand and flow-on benefits in establishing new industry to produce compostable bags here in SA?

Responses to this either demonstrated a desire to ban all plastic bags or supported the use of compostable bags at checkouts and as produce bags.

"The total banning of plastic bags is preferable" cxx

"All plastic materials ideally should be compostable" cxxi

"We recommend that all checkout plastic bags should be banned" cxxii

The rationale behind supporting a ban of all plastic bags was:

Confusion between different types of materials, with some being compostable and others not.
 This is likely to lead to consumers making mistakes in disposing of bags or being "duped into purchasing" and using harmful bags

"We do not support the use of any bags made from any thermoplastic extruded film including those claimed to be biodegradable "exxiii"

"Designing for oblivion is not considered the best option..."cxxiv

- Unclear definitions of material descriptions, even in accepted dictionary sources
- No confidence in the standards conformity statements of bag manufacturers
- Concerns for the efficacy of breakdown of compostables in marine environments, as opposed to in soil
- Fears that compostable bags are not strong or durable enough for purpose
- Consumers must take (some) responsibility for reducing plastics use, e.g. procuring alternative ways and means of transporting shopping, using boxes, trolleys, textile bags
- With the wide range of available substitutes and alternatives, there is no need for any form of
 plastic bags at checkouts. It is better that consumers are educated to cease to rely upon any
 form of plastic bags
- Production and transport involve the use of scarce resources, e.g. fossil fuels, and produces a carbon footprint

- Insufficient provision of waste management arrangements for households across SA and nationally, resulting in contamination, more to landfill, littering and unsuccessful resources recovery
- The additional costs incurred to fight/remediate waste stream contamination
- Costs of providing additional composting facilities, separation or collection points
- Economic development opportunities for entrepreneurs capitalising on ways of reducing use of plastics
- Following the teachings of the Waste Hierarchy leads to the conclusion that bags are a last resort
- Fears of adding to the plastics problem via generation of microplastic waste and pollution from different types of bags and methods of disposal or littering.

"There is simply not a need to put vegetables and fruit into any sort of plastic bag. Nature often provides its own packaging" cxxv

"... a lack of clarity around handling of the material may lead to a higher degree of littering behaviour by consumers, creating a counter-intuitive outcome "cxxvi"

Those supporting the provision of compliant compostable bags gave the following rationale:

- Use/usefulness in food shopping, especially if replacing plastic-lined paper or single-use bags, e.g. deli's butchers, fish shops
- Proven success trials of food waste disposal
- Natural fit between produce/food, compostable bags and sustainable disposal, e.g. home composting, kerbside green waste collection, use in Council caddies
- Support for local production and industry surrounding compostable bags
- With the benefit of increased use/demand, costs will decrease
- Dealing with waste in a manner that does not cause harm to the environment
- Used for dog waste
- Partially-established, acceptance and use in households, supermarkets and other retailers
- Government to focus support into facilitating the successful use of compostable bags, not to do will risk scheme failure
- The possible provision of an industry/retailer incentive or subsidy scheme, following investigation into its desirability
- Reduction of contamination in food waste streams
- Reduction in cost (of purchasing bags) to householders and Councils using food waste disposal systems, e.g. Council caddies
- The familiarity with, and acceptance of, the concept of compostability created by the provision and use of compostable shopping and produce bags may flow-on to encourage development and use of compostability in other consumer items, e.g. coffee pods, sauce containers, crockery and cutlery
- Provides an acceptable alternative to retailers who are uncomfortable about consumers using/bringing their own containers.

"It will reduce confusion for consumers" cxxvii

"Encourage clarity in the naming of plastic and particularly oxo-degradable plastics" cxxviii

There was a call for the development of a national approach to the management of plastic bags (of all types) to be undertaken so that consistency is applied across all Australian jurisdictions.

"We would urge the government, while supporting South Australian manufacturing and industry to work also to achieve a truly national approach to this issue"cxxix

3.2.4.5 What do you think about the idea of banning lightweight single-use shopping bags even those made from biodegradable, degradable or compostable substances as has been proposed in other Australian jurisdictions?

Many of those who responded to this question employed it to reinforce their view of banning *all* plastic bags, regardless of their claim of being environmentally-friendly.

"Banning lightweight single-use plastic bags or enforcing compostable bags, including compostable barrier bags should be mandated" parties."

"The important fact is that waste is not an option" cxxxi

"Plastic does not biodegrade" cxxxii

Others told us:

- SA should learn from activities within other jurisdictions, with more advanced circular economy strategies
- Compostable bags work well in home-composting
- Consumer education will be required if approved for wider use, e.g. explanation of labels/iconography and correct disposal
- Compostable bags contribute to the production of (harmful) methane
- · Bags which are not compostable should be banned
- SA should establish more composting facilities
- Education should also include other sectors of the population, e.g. retailers, industry, commercial, retail
- There is a need to significantly develop waste management infrastructure to manage this initiative, if it were to occur.

The point was made that householders are confused about the terms 'biodegradable, 'degradable' and 'compostable and many fail to differentiate between the three, perpetuating an environmental hazard. Further education, research and development is required before making binding decisions on this topic.

"Household kerbside and school waste audits conducted by trained KESAB Audit Team show significant contamination through lack of understanding and confusion by consumers disposing of plastic bags (and other plastic products) even though they are trying to do the right thing" thing" to do the right thing" the same trying to do the right thing the same trying to do the right thing the same trying to do the right thing the same trying the same trying to do the right thing the same trying the same trying the same trying to do the right thing the same trying trying the same trying the same trying the same trying the same trying trying

"... using these terms interchangeably creates great confusion, and it would be preferable to remove the first two terms and use only COMPOSTABLE – please!"cxxxiv

3.2.4.6 Do you think South Australia should introduce measures to address items such as single-use plastic straws and plastic-lined take away coffee cups?

What other single-use plastic items or single-use products would you like to be considered for possible government intervention?

All responses demonstrated support for the introduction of measures including bans and other ways to change behaviour, and many provided additional advice, as follows:

- To examine and research all aspects of the proposed measures so that they take multiple consequences into account and manage outcomes over the longer term, and across the value chain
- Employ the opportunity to build thoughtful consideration of products by consumers
- Extend a ban to all single-use containers or products which are difficult or impossible to recycle, particularly (and definitely) when environmentally-sustainable alternatives are available and affordable
- Strive to remain up to date in terms of knowledge and use of new technologies and processes and their contributions to this activity

- Examine these measures through the lens of the principles of sustainability, the Circular economy and the responsibilities of product stewardship
- Maintain a commitment to, and the practice of, continuous and thorough engagement with all stakeholders
- Refer to the New Plastics Economy Global Commitment (Oct. 2018) for guidance on policies and measurable targets
- Include those cups marked "recyclable" where these are sending cups long distances (interstate) for reprocessing
- Provide explanations (and proof) that offering paper straws upon request (as opposed to automatically providing plastic straws) will save money at point of sale
- Initiate campaigns to encourage reusable cups, e.g. Zero Waste Scotland
- While encouraging use of compostable cups, provide sufficient waste collection bins in public spaces
- While banning plastic water bottles, provide more drinking fountains and refill points in public spaces
- Encourage BYO straws, cups, cutlery etc.
- Discourage dining and drinking out of home or, encourage on-premise consumption (using reusable serviceware)
- Allow venues to change more for compostable products
- Provide training for staff in takeaway providers to educate consumers on the correct ways to dispose of their containers, cutler, bags etc.
- Improve labelling
- Implement reduction targets.

"Policies must be designed to specifically encourage non-plastic alternatives" cxxxv

"This is the perfect time for the government to act"cxxxvi

It was mentioned that before this question could be fully addressed, South Australia needs to develop a clear understanding of the definitions of different terms so that items can be assessed within clear parameters.

"The ban could apply to products identified in the Single-use and Other Plastics (Waste Avoidance) Bill 2018" CXXXVIII

Items which were specifically mentioned for inclusion were:

- Plastic straws
- Plastic-lined beverage cups and lids (but only those which are non-recyclable and contaminate waste streams), not only used for coffee but including: milkshakes, soft drinks
- All plastic beverage containers (non-compostable)
- Single-use plastic plates and bowls
- Single-use plastic cutlery/single-use food serviceware
- Fruit and vegetable packaging
- Expanded polystyrene (EPS) foam, styrofoam packaging, cups, trays etc.
- Plastic stemmed cotton buds
- Balloons/balloon sticks, balloon ties, balloon releases, helium balloons and helium (to prevent released balloon litter at its source)
- Confection sticks
- Plastic water bottles
- Microbeads in personal and household products
- Single-use plastic beverage containers
- Sanitary applications; wet wipes, sanitary towels
- Absorbent hygiene products
- Smoking on beaches/additional smoking waste receptacles in public spaces (near beaches)
- Bottle tops
- Barrier bags, plastic bags

- All single-use plastic items but include a standard and premise for determining inclusion or exclusion of items such as health, sanitary, microplastics, non-plastic single-use disposable and absorbent hygiene products
- Condiment sachets, e.g. sugar, salt, pepper, sauce, soy fish
- Plastic wrapping and alternatives
- Fishing gear
- Hospital curtains
- PPE gowns
- Cable ties
- Hospital food delivery products
- Compostable and biodegradable products.
 - "... that need and the availability of sustainable alternatives be the principles underpinning decisions on which products to focus on at this stage "exxxviii"

3.2.4.7 What are your views on the list of items excluded (see page 30) and do you think there are others that do not require additional action or should be exempt from possible government intervention, and why?

Are there exclusions that should be included? Why?

In addition to, or specific restatement of, those listed on page 30 of the discussion paper, items recommended for exclusion (for various reasons) were:

- Hospital and medical items
- Products necessary for the preservation of life
- Recyclable coffee/beverage cups and lids, e.g. wax-lined
- Recyclable straws, e.g. paper
- Marine debris
- Microplastics and microbeads being managed via national channels
- Single-use plastic beverage containers
- Items managed through the Container Deposit Scheme
- Items which could be modified and improved by design to become environmentally sustainable and/or provide added value to the community
- Plant-based biodegradable and compostable plastic
- Non-plastic single-use, disposable items, e.g. packaging
- Single-use plastic beverage containers, not addressed through Container Deposit Scheme
- Sanitary applications, e.g. wet wipes, sanitary towels, absorbent hygiene products
- BYO containers.
 - "... keep the scope of the items manageable and ... effect change in a timely manner "CXXXIX"

3.2.4.8 Do you think that labelling describing how to recycle or dispose of a product, or parts of the product is helpful to consumers?

For which products would better labelling enable better disposal?

There was broad support for improvements to labelling, as follows:

- Drawing attention to the environmental harm that the product is creating, e.g. on plastic-lined coffee cups
- Educating for correct disposal or the item
- Ensuring labels are readable/identifiable/decodable, e.g. letter sizing, detail on smaller items, developing a colour-coding system
- Collaborating across jurisdictions to produce a consistent, national approach to labelling

- Pursuing truth and clarity to inform consumers, e.g. the difference between biodegradable and compostable, compliance with relevant certifications, the item's recyclability, compostability, directions for disposal, recycled content
- Informing consumers about how/where the waste will be recycled/handled, e.g. overseas, locally
- Consider and prepare to rebut/overcome the historical argument for the minimisation of labelling content, based around the potential impact on Trade Mark logos, brand protection and available space
- Collaborating with the APCO/Planet Ark/PREP project
- Providing effective consumer education surrounding new labels and what they mean and what actions they require, e.g. via mainstream media and other forms of communications
- Ensure synergy between labelling and the actual methods of disposal available to consumers/users
- Include bin labelling and engineering in this review
- Focus specifically upon soft plastics and mixed materials labelling to include disposal methods
- Mandate that all products sold in Australia need to comply with labelling regulations (with individual approvals), regardless of origin/country of manufacture.

"Rather than looking at targeting specific products, investment needs to be made in a consistent, national labelling scheme" cxl

"Clear labelling is so important!" cxli

Aspects of label design to be avoided and/or minimised were:

- Labels which will add to the problem of sustainable design, e.g. additional plastic, difficult to separate from other parts of the packaging
- · Labels which are deemed unnecessary
- Placing all the responsibility upon consumers where other aspects of the product's journey also have a part to play, e.g. designers, collectors, reprocessors, end markets
- Labels changes without accompanying consumer awareness and education.

In discussing labelling, it was also mentioned that users' understanding of the labels and the information they provide and recommended subsequent actions needs to be facilitated. This could be achieved through consumer education campaign and carrying label messaging through to other media, e.g. bins, communications.

"Wider community education about differences and the reasons behind specific forms of recycling is needed" cxlii

"Labelling has always been the most important manner in which to convey information to the consumer. With so many different plastic numbers it can be confusing for the consumer to know what can be recycled and what can't

3.2.4.9 Feedback specific to South Australian manufacturers and importers

Those submitting responses were asked: "If you are a South Australian based manufacturer or importer of any of the single-use plastic products mentioned in this discussion paper, what are your views on this topic? Do you have access to alternatives? Are there cost impacts that need to be considered as part of the discussion?"

Those responding to the question represented that design for reprocessing is a principle applied to all their products and that this should be followed elsewhere.

Further, manufacturers should be fully aware of the source and formulation of their component plastics and ensure they are identified by standard symbols to facilitate recycling and reprocessing globally.

It was suggested that, in focusing on the future of sustainable production, there are many opportunities for local manufacturers and importers and the government was encouraged to support this sector development.

"... sustainable alternatives can and do provide business opportunities" "First movers benefit from the creation of new industries" rexliv

An adviser to this industry sector highlighted their concerns surrounding the increased cost of providing compostable items (vs single-use plastics), their confusion over the legitimacy of compostability claims and fears associated with passing costs to consumers.

3.2.4.10 Feedback surrounding consumer impacts

Those submitting responses were asked "as a consumer of single-use plastic products mentioned in this summary, what are your concerns? What would you like to see done to address the problem(s) or concern(s)?".

The following calls-to-action were received from these stakeholders:

- An immediate ban on all plastic bags
- A ban on all single-use plastics as soon as practicable
- A bipartisan approach to governance and facilitation of resolution to the problems created by single-use plastics
- Strong action from politicians
- Resolve issues relating to litter
- Resolve issues relating to landfill
- Reduce availability of single-use plastics
- Provide more consumers with the means to effectively fight the battle against single-use plastics and prove their collective power
- Amend Legislation to improve clarity and comprehension
- More education surrounding the activities of refusing and reusing consumer items to decrease one's single plastic footprint
- Holding manufacturers responsible for the items they produce
- Support to develop habits surrounding the use of substitutes and alternatives to single-use plastic products
- Education for consumers so they know which plastics can be recycled and how to effect this
- Providing reassurance that genuine recycling occurs
- Supporting consumers to change, reminding them (particularly those older) that life without plastic is possible (and was previously)
- Support more widespread changes, e.g. at events, standardising bin systems and collections, educate
- Design policy that conforms to the Waste Hierarchy, being weighting towards refuse and reuse first
- Lack of consumer understanding about compostable and biodegradable products and the harm they cause.

"It is timely now that this be done. Now, more than any time previously consumers are mindful of the damage plastic is wreaking on the environment" cxlvi

"Individual action is not enough" cxlvii

"Many people feel helpless to effect change" exlviii

3.2.4.11 Do you think government intervention is required in relation to single-use plastic products or other single-use items? If so, what type and in what timeframe?

There was 100% support for government intervention in relation to single-use plastics. Many referred to South Australia's history of leadership in this domain and requested this continues around the topic of plastics and the environment.

"South Australia should again not be afraid to lead from the front and lead by example. We have the community on board. We know what needs to be done; and the time is right" to lead from the front and lead by example.

"... the opportunity to take a lead and urge other states and local governments to work together, perhaps through COAG, to achieve a truly national approach"

"Strong changes are required"cli

"Few companies and individuals will change a lifetime habit and income stream unless change is forced upon them" them to be a lifetime habit and income stream unless change is forced upon them to be a lifetime habit and income stream unless change is forced upon them.

Many different approaches to government intervention were suggested by the stakeholders, and these have been summarised below:

- Establishment of an advisory board, demonstrating collaboration between services, industry, government and education and representing all elements of the value chain
- Phase out/phase in lead times, ranging in length from 12 months to the year 2025
- Establish reduction targets and timeframes
- Employ the government's actions to send a strong signal to consumers about the importance of waste minimisation and recycling
- Support innovation to effect change and develop substitutes and alternatives through policies of encouragement and regulation
- Regulate product performance criteria and compliance, e.g. 'compostable'
- Enforceable legislative amendment, e.g. definitions of shopping bags, compostability compliance safeguards, punitive response to fraudulent and harmful behaviour, regulation of sale, prohibition, implementation of time-bound objectives, sufficient flexibility to allow for change and expansion
- Begin with a short list of tasks, expand, develop and implement more as time progresses
- Facilitate the acceptability and use of BYO containers, review/progress the Bill currently with the SA Legislative Council, i.e. Civil Liberty (BYO Containers – Waste Avoidance)
 Amendment Bill
- Expand the Container Deposit Scheme(s) in SA and other jurisdictions
- Compliance, enforcement and the application of penalties to improve effectiveness of the Australian Packaging Covenant
- Multiple collaborative approaches working simultaneously, e.g. initiating both "top-down" (legislation) and "bottom-up" solutions, inter-jurisdictional, nationally, internationally
- Follow the EU Framework outlined in the <u>European Strategy for Plastics in a Circular Economy</u> adopted in January 2018
- Follow the Single-use and Other Plastics (Waste Avoidance) Bill 2018 (Legislative Council No 31)
- Address product design by providing the foundations for good design and avoidance of problematic materials and outcomes
- Foster the development of innovative materials
- "Target problematic material properties, rather than the materials themselves"
- Invest in waste management that produces and develops use of secondary materials, including collection and recycling on closed systems, e.g. education sites, hospitals, aged care
- Support and share research and development into plastics, circular economy, materials, behavioural economics
- Support for industry reference groups
- Development of case studies of current best practice to provide education for industry groups, market sectors, events, collectors and processors
- Plan for job and/or industry loss as a result of intervention and behaviour change

• Allow for investment and innovation to drive a circular economy.

"That there is so much problem now with plastic in our environment is testimony to the fact that regulation always lags behind innovation and science" eliv

"... allow a flexible and adaptive framework which can respond appropriately to environmental, social and economic issues rely

3.2.4.12 Do you think restricting the sale or supply of some single-use plastic or other single-use products for which there are more sustainable alternatives is a good idea?

With continued agreement from all stakeholders, some advocated for the adoption of a broader scope:

- Adopting a circular economy approach, beginning with sustainable product design mandates
- Removal of the word "restricting", replacing with the word and action of "banning"
- Ensuring sustainable alternatives are available before acting.

"Our members believe that this does not go far enough" clvi

"As senior citizens we sadly have come to realise that our current generations have been the most wasteful and careless environmentally sensitive people who now have a duty to try and salvage a situation for our grandchildren who also have the right to enjoy a clean bio-diverse world" clvii

"The days of 'preaching' single-use items are recyclable, when the real situation shows products are not being recycled or reprocessed, must change and influenced either by sustainable stewardship programs or legislation

"The majority of consumers and producers continue to either turn a blind eye to the problem, believing that the solution lies in someone else's hands; or are unable to easily access alternatives and change behaviour. It is for this reason that we support the South Australian Government's initiative to regulate against the use of single-use plastics, with specific focus on those items where sustainable alternatives already exist'clix

3.2.4.13 Additional suggestions for the future management of single-use plastics from the NGO and shared interests sector

In addition to direct responses to the questions asked within the discussion paper, some stakeholders made additional points for considerations during this consultation. These have been summarised below:

Support for the United Nations Sustainable Goals

The United Nations have developed 17 Sustainable Development Goals, and it was recommended that Green Industries SA should support these all, and in particular SDG 14 referring to "life below water".

Reference: https://www.un.org/sustainabledevelopment/sustainable-development-goals/

Adopting the Principles of the circular economy

It was proposed that adopting the principles of the circular economy will help to create a more sustainable and prosperous South Australia, leading to the "better and more balanced world". Reference: http://www.sandbirch.com/10-things-you-need-to-know-about-the-circular-economy/

Placing greater focus on design

Placing a greater focus on, and advocating for, good product design should encompass the many aspects of the product's end-to-end value chain, including sourcing, manufacture, distribution, use and recovery.

"Developed economies need to take the lead in solving the problem and position design-led innovation at the heart of it" clx

Education leads to change

A greater emphasis on education is recommended, not just directed at consumers and the waste management end of a product's life, but from the beginning of the product stewardship journey, e.g.

- The role of product design in the circular economy
- How to employ different materials and designs to achieve sustainability outcomes
- Repurposing waste for profit
- How to apply for grants and other funding of circular economy initiatives

"Advocate focus on the role of, and application of design as a critically important contributor restricting the use of single-use plastic items to balance demand and supply side for use and reuse" clxi

Transparency of performance metrics

In setting, measuring and publishing performance metrics, the state will demonstrate commitment and the resourcing for achieving goals.

Additional review and resourcing can be directed towards areas proven to not be achieving desired performance and outcomes. In cases where success has been identified, these should be exemplified in a positive way, e.g. recognising and celebrating through awards.

Redefine landfill as an untapped resource

In changing how we look at landfill, the State could encourage local innovation and industry through improved approaches to reuse, recycling and repurposing.

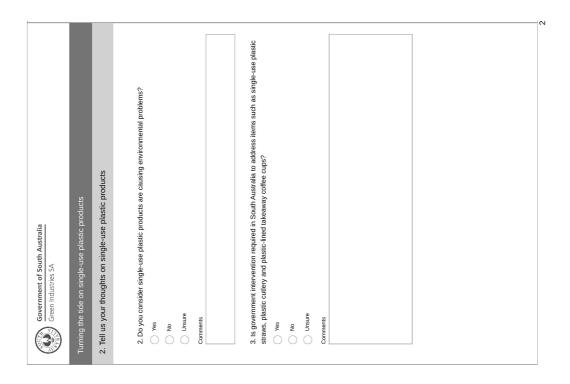
"Currently waste disposed to landfill is not being recognised as a potential valued resource" clxii

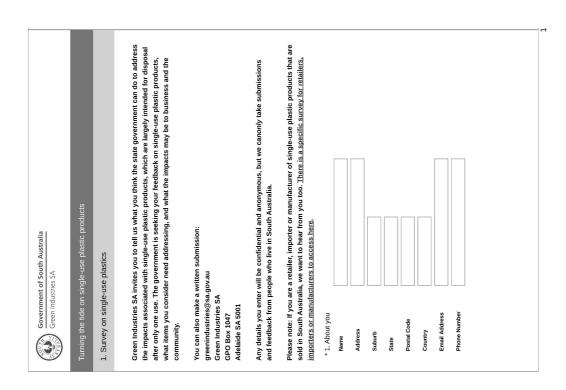
APPENDICES

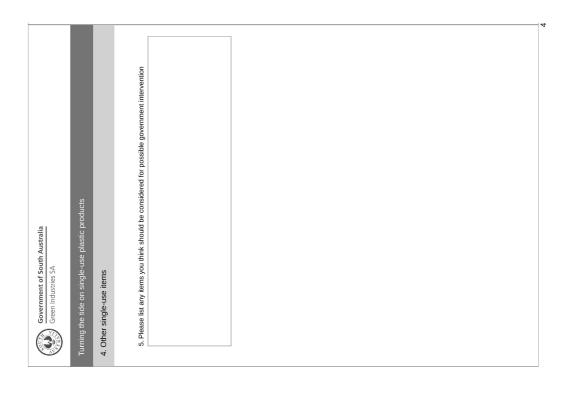
APPENDIX 1: YOURSAY SINGLE-USE PLASTIC CONSULTATION QUESTIONNAIRES

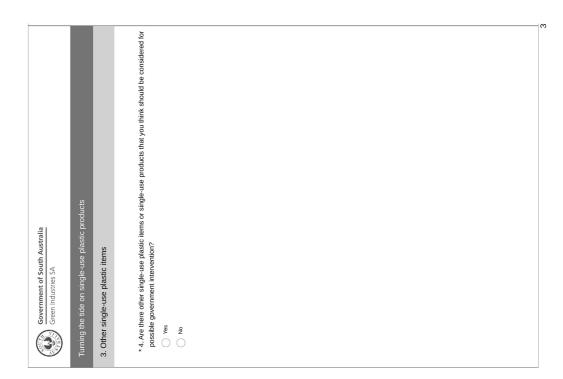
(accessed via YourSAy consultation tool)

General public's questionnaire

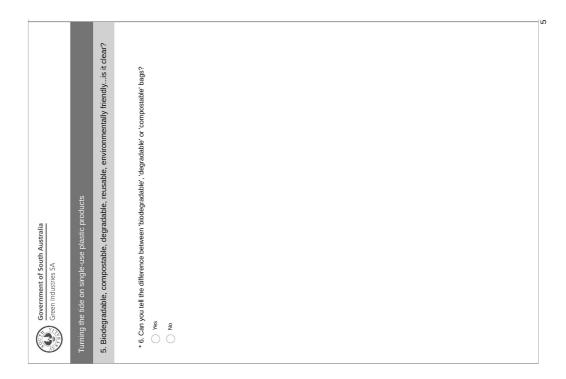




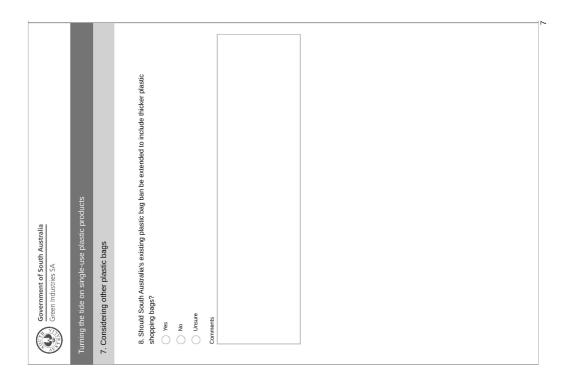


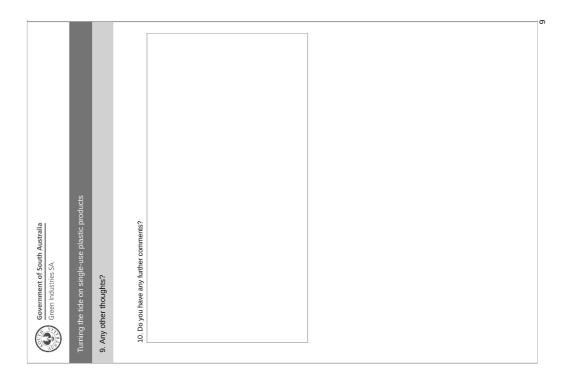


			_
Australia plastic products		7. Should all checkout bags and produce bags (i.e. fruit & veg bags) be made from compostable materials? Ves Oursure Comments	
Government of South Australia Green Industries SA Turning the tide on single-use plastic products	6. Compostable bags	7. Should all checkout bags and produce bags (i.e. fruit & veg ves No Unsure Comments	

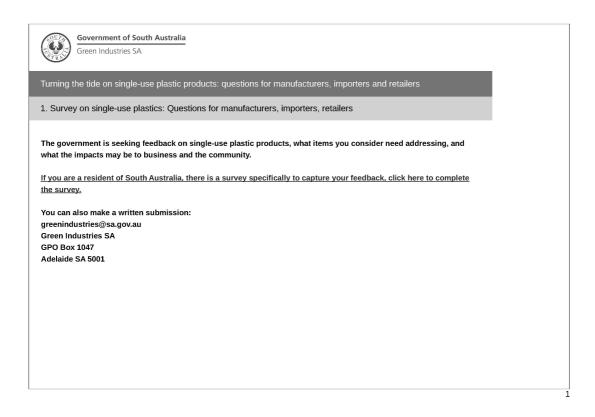


		scycle or dispose responsibly?	
Government of South Australia Green Industries SA Turning the tide on single-use plastic products	8. Labelling and packaging advice	9. Do you look for recycling advice on packaging to help you recycle or dispose responsibly? No No	

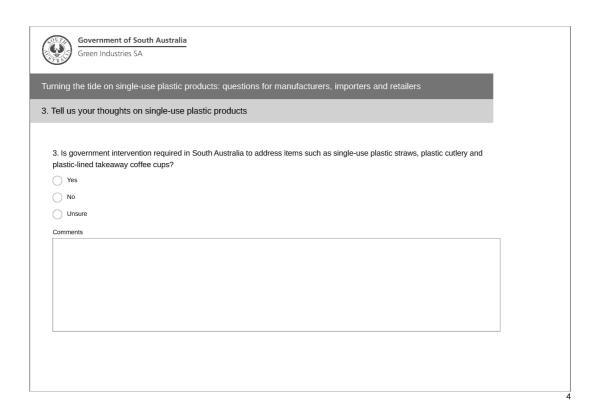




Manufacturers, importers and retailers' questionnaire



* 1 About you		
* 1. About you	-	
Name		
Company		
Address		
Suburb		
State		
Postal Code		
Country		
Email Address		
Phone Number		
		2



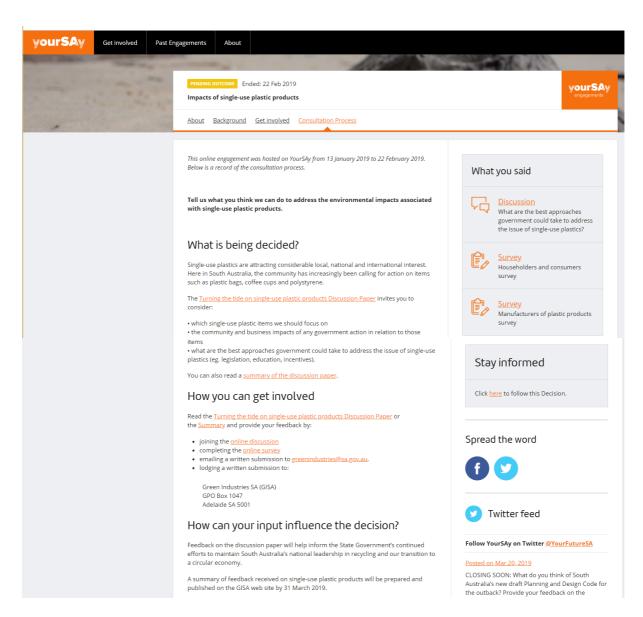
Government of South Australia Green Industries SA					
Turning the tide on single-use plastic products: questions for manufacturers, importers and retailers					
4. Considering other plastic bags					
4. Should South Australia's existing plastic bag ban be extended to include thicker plastic shopping bags? Yes No Unsure Comments					

Green Industries SA				
Turning the tide on single-use plastic products: questions for manufacturers, importers and retailers				
5. Any other thoughts?				
5. Do you have any further comments on single-use plastics regarding the impacts or opportunities that you see?				

APPENDIX 2: YOURSAY CONSULTATION SITE

(accessed via: https://YourSAy.sa.gov.au)





proposed new planning rules for land outside of Subject to the outcomes of this consultation process, further detailed consultation with council boundaries. Visit YourSAy and join the business, industry and other parties will be undertaken. discussion http://yoursay.sa.gov.au/planning-outback ... Contact details For general enquiries please phone (08) 8204 2051 or email greenindustries@sa.gov.au. Posted on Mar 19, 2019 We want your help to improve our statewide Closing date: Friday 22 February 2019 approach to managing dams and levee banks - join us in reducing the impacts of floods in South Australia. #floodmanagement #southaustralia #adelaide Help us manage the magnificent Lake Gairdner National Park, Login to YourSAy and tell us what you think about the draft management plan. #lakegairdner#soutthaustralia Posted on Mar 18, 2019 Help us manage the magnificent Lake Gairdner National Park. Login to YourSAy and tell us what you think about the draft management plan. #lakegairdner#soutthaustralia Statistics 180 107 Comments made Contributors

What are the best approaches government could take to address the issue of single-use plastics?

Hello and welcome to the discussion forum on single-use plastic products.

Read the <u>Turning the tide on single-use plastic products Discussion Paper</u> or the <u>Summary Paper</u>.

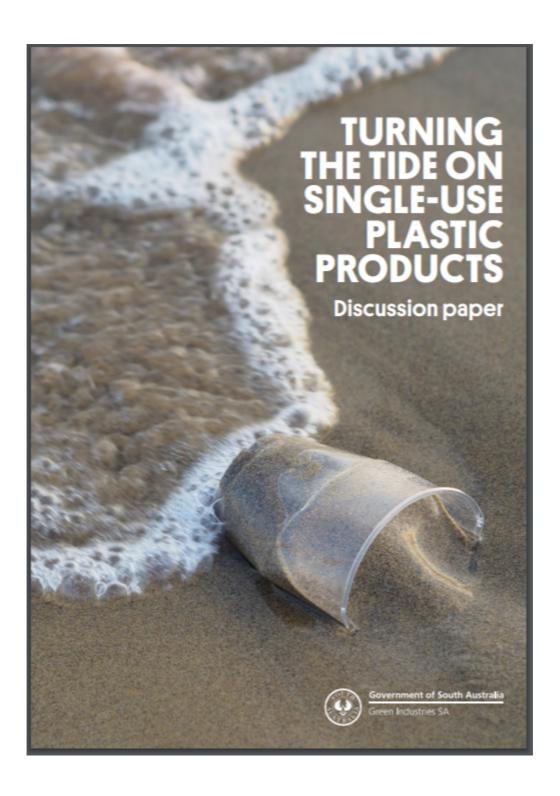
What are the best approaches government could take to address the issue of single-use plastics (eg. legislation, education, incentives).

Provide your feedback in the discussion below.

Respondent statistics

GENDER	NUMBER	PER CENT %
MALE	36	35%
FEMALE	68	65%
OTHER	1	1%

*Percentages adding to greater or less than 100% are due to the effects of rounding to the nearest whole number.





APPENDIX 3: YOURSAY CONSULTATION ONLINE ENGAGEMENT REPORT March 2019



ONLINE ENGAGEMENT REPORT

Impacts of single-use plastic products 7 January 2019 to 22 February 2019







Overview

Your consultation process was promoted from 7 January 2019 to 22 February 2019. It included an online engagement on YourSAy.sa.gov.au with a discussion and two surveys, as well as email and social media activity.

Overall, this campaign achieved a cumulative reach of 62,096 and generated 14,075 visits to the website to learn more.



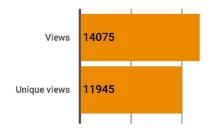
Impacts of single-use plastic

Ended: 22 Feb 2019

Tell us what you think we can do to address the environmental impacts associated with singleuse plastic products

Website analytics

This consultation featured on YourSAy.sa.gov.au for 7 weeks. These charts provide an overview of the activity on the website during this time. Website traffic was significantly higher than typical engagements on YourSAy indicating this topic is of particularly high interest.









1,009

Discussion paper link clicks



1,099

Summary discussion paper link clicks







YourSAy Channels

We promoted your engagement on social media across 6 posts, achieving a cumulative reach of 35,165 people on Facebook and Twitter during the open consultation period. Engagement was significantly higher than typical engagements on YourSAy indicating this topic is of particularly high interest.

Discussion hub



180

Comments



107

Contributors

On Twitter



14,279

Impressions



Tweets

#reducewasteSA

On Facebook



20,886

Reach



637

Reactions



563

Post clicks



49

Comments



Post shares







YourSAy Channels

These are some of the posts we shared through YourSAy social media channels.

You will see the message evolved over time to include references to time to encourage the public to participate before the engagement closed.



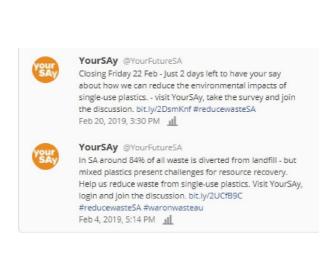
Your Say South Australia

14 January · 🕢



Tell us what you think we can do to address the environmental impacts.





Impacts of single-use plastic products



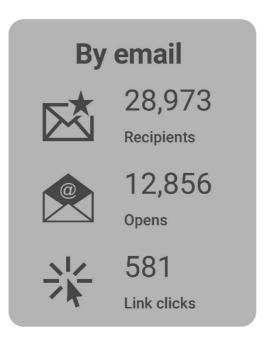


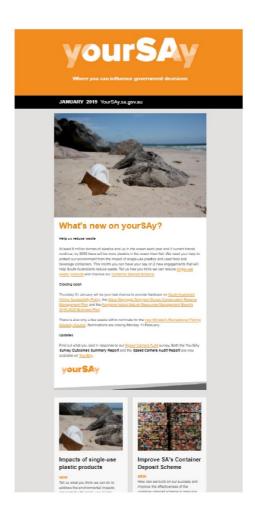


YourSAy Channels

Your engagement was sent to 28,973 registered YourSAy users on January 29.

The email was opened 12,856 times giving a large number of people the opportunity to see your engagement at least once.





ENDNOTES

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<sup>i</sup> Greeneco Discussion Paper, p1
" AHA:SA Response Appendix B, p3
iii AFGC Submission, p4
iv Campbell's Arnott's Submission, p1
V Campbell's Arnott's Submission, p1
vi Business SA Submission, p6
vii Detmold Group Submission, p1
viii PVC Separation Holdings Pty Ltd Submission, p4
ix YourSAy Industry Survey Response, Q5
* YourSAy Industry Survey Response, Q5
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xii Detmold Group Submission, p1
xiii Business SA Submission, p7
xiv YourSAy Industry Survey Response, Q5
xv Rawtec Submission, p2
xvi PAK360 response, email
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xviii Australian Packaging Covenant Organisation Submission, p6
xix Campbell's Arnott's Submission, p2
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xxi TLI (Australia) Pty Ltd Submission, email
xxii YourSAv Industry Survey Response, Q5
xxiii Business SA Submission, p8
xxiv AFGC Submission, p10
xxv National Retail Association Submission, p7
xxvi AFGC Submission, p12
xxvii AFGC Submission, p12
xxviii Campbell's Arnott's Submission, p2
xxix Campbell's Arnott's Submission, p2
xxx Business SA Submission, p9
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xiviii City of West Torrens Submission, p1
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ii City of Port Adelaide Enfield Submission, p1
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iiv City of West Torrens Submission, p2
iv City of Adelaide Submission, p7
ivi City of Holdfast Bay Submission, p3
ivii City of Campbelltown Submission, p2

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lxi City of Mitcham Submission, email
lxii City of Marion Submission, p4
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lxiv City of Mitcham Submission, email
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cxi Loop Circular Economy Platform Submission, p2
cxii Loop Circular Economy Platform Submission, p2
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cxiv Eco Matters Queensland, letter
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cxv KESAB Submission, p3 cxvi A Simple Shift Submission, p2

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- cxviii AIEN Submission, p4
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- cxxi Consumers SA Submission, p2
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- clv Environmental Defenders Office (SA) Inc Submission, p8
- clvi Soroptimists International of Barossa Valley Submission, p1
- clvii Tea Tree Gardens Residents Association Inc., letter
- clviii KESAB Submission, p1
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- clxi Good Design Australia Submission, p5
- clxii KESAB Submission, p3