



**Stakeholder and public feedback Submission from
Keep Australia Beautiful National Association**

To

**The Standing Council on Environment and Water
Packaging Impacts Consultation Regulatory Impact Statement**



Keep Australia Beautiful National Association Background

Keep Australia Beautiful's mission is 'to lead, challenge and inspire all Australians to strive for a sustainable and litter free environment'. It does this through its own operations, that can act as an example to others, and through its programs, that have the potential to reach all Australians.

Keep Australia Beautiful National Association (KABNA) is a federated body with programs operating in every state and territory through member offices. Each of these programs encourages people all around Australia to care for their local environment. Keep Australia Beautiful National Association was established in 1968 and is a not for profit association registered in the ACT with deductible gift recipient status.

Keep Australia Beautiful National Association has a proud history in working in partnership with community, government and industry to achieve positive environmental outcomes. KABNA is very well known for promoting litter prevention and reduction activities in the 1970's and early 1980's. This was achieved through numerous television advertising campaigns and community activities and resulted in a cultural shift as to how all Australians viewed litter and the environment. Reduced sponsorship from industry and government over the past two decades has curtailed KAB's reach and focus on broad scale public awareness and education and currently there is an excellent opportunity to recommence similar activities.

Keep Australia Beautiful National Association's approach

Based on over 40 years of proven experience and collaboration in litter prevention, Keep Australia Beautiful National Association believes that working alongside community, government and industry is the only way in which to achieve positive environmental outcomes. In response, the Keep Australia Beautiful National Association Board on 27th February 2012 resolved:

"Based on the current PICRIS research, KABNA supports Option 2b as the preferred national packaging recycling / litter reduction policy suggestion being considered in the PICRIS. It delivers a close alignment to KABNA's mission to reduce all litter. This will be achieved without impacting on State and Territory activities. This includes our expectation that all industry should invest more in product stewardship, and achieves a balance between costs and benefits on a whole of community basis."

Keep Australia Beautiful National Association has been working closely with industry to develop a five to ten year National Litter Plan to reduce litter by 10% in the first five years and a total of 20% in ten years (by volume). In the past 12 months, KAB has partnered with Industry and delivered the following (also detailed in attached plans):

- The Little Committee youth advisors council and public awareness campaign
- Litters anonymous National Advertising Campaign
- Pilot projects which are being launched in NT and Tasmania in May 2012 which aim to engage community and local government in coordinated litter prevention and recycling activities.
- NPCIA partnerships to engage industry and work together on the below plans.

Please see attached the draft National Litter Plan. This plan will be changed and altered depending on government policy decisions and additional information and research which is available between now and the implementation of the plan. An additional plan has been developed in order to pilot selected projects and prepare for the possible introduction of the National Litter Plan. This plan is also attached and a media release is included at the end of this document which further explains the organisations position and plans. Please note that these plans will change as information, research and other influences also change.



Keep Australia Beautiful National Association also plans to work alongside the Australia Packaging Covenant Council of which it is already a community member as well as the National Packaging Council Industry Association and other industries to support and fund the plans discussed above.

Keep Australia Beautiful National Association aims to measure and evaluate the performance of the National Litter Plan through the current National Litter Index and Branded Litter Study methodology. On 27th February 2012, the KABNA Board approved:

“That the KABNA Board resolves that the current independent National Litter Index is to be the measure to track progress of litter reduction and will meet the needs of the proposed National Litter Plan and has the ability to adapt to the changing needs of funders and users.”

Responses to questions included in the PICRIS

Questions from Section 2.7

What do you think are the future challenges relating to packaging and packaging waste?

- The increased importation of foreign products leads to a likelihood of reduced control and regulation on packaging on imported products
- The shared responsibility to accept that packaging waste is a major problem and for all industries to accept responsibility as well as all individuals to take personal responsibility for their consumption of packaging.

What packaging materials do you think will dominate in the future? What are the likely impacts?

Light weight flexible packaging has certainly increased significantly in recent years and this trend doesn't seem to be slowing down. With continual packaging evolution these types of plastics are now packaging products like yogurt, soup and other liquid perishable items. These types of packaging take up very little room in the waste stream; however most of them aren't able to be recycled due to complex polymer structures (far different from recyclables 1-5).

Do you think that designing packaging with recyclability in mind is desirable?

This is not only desirable but essential. It must also be highlighted that single use items like plastic bags and coffee cups can be substituted for personal coffee mugs (i.e. keep cups) and reusable bags (i.e green bags, calico etc).

Products should be designed taking the waste management hierarchy in mind. Therefore instead of highlighting recycling first, the Avoid, Reduce and Reuse steps should be considered in packaging design and if these can't be incorporated then recycling features should be integrated in to packaging design.

What changes will occur with secondary packaging?

Secondary packaging will only increase due to increased trends with online shopping and wholesale retailers like Costco.

How will the trend for on line shopping affect packaging consumption or choice of packaging material?

Online shopping influences increased packaging materials and often the consumer isn't aware of this until the goods are delivered.

Questions from Section 3.3

Do you agree with the packaging resource recovery and litter management problems identified above?



Yes, Keep Australia Beautiful National Association agrees. In addition, KABNA also believes that littering is a behavioural change issue which also requires significant cultural change, awareness and education which is addressed in the attached plans.

Are there any problems with packaging resource recovery and litter management that have not been identified in Chapter 3?

Keep Australia Beautiful National Association agrees with the identified problems listed in chapter three. However, in addition, there is still a significant gap in public awareness, education, infrastructure and enforcement and KABNA believes that if these are all addressed in a coordinated approach then resource recovery and litter management will be improved.

Questions from Section 6.6

Are the projected rates for packaging recycling and litter reduction realistic?

Keep Australia Beautiful Nation Association believes these rates are realistic, however some figures are slightly inaccurate, one of these points is the percentage of litter reduction forecast for option 1. This seems to be high considering the activities involved in the delivery of option 1. Other similar examples also exist.

What impact, if any, would the options have on packaging consumption, for example would the options lead to a reduction in consumption levels?

Only option 4a and 4b wouldn't alter consumption because price elasticity would more than likely not be influenced at only \$0.10 which represents only a few percent of most products.

Article for WME

KEEP AUSTRALIA BEAUTIFUL SUPPORT PARTNERSHIP APPROACH TO RECYCLING AND LITTER

Keep Australia Beautiful (KAB) is Australia's leading grassroots environment organisation, with more than 40 years' experience in changing behaviour around litter and recycling through community engagement and partnerships. KAB is well credentialed to contribute to the deliberations of the COAG Standing Council on Environment and Water on potential national measures to increase packaging recovery and decrease packaging litter. Advocating effective policy is an integral part of our mission to lead, challenge and inspire all Australians to strive for a sustainable and litter free environment.

KAB has monitored the COAG process, including the initial cost / benefit assessment of the various policy options released by the Commonwealth last December. We have also engaged extensively with Australian governments at all levels, including local government, and sought the views of communities, industry and peak bodies, before our National Association formally endorsed Option 2(b) – an industry funded proposal - earlier this month.

In assessing the various policy options on the COAG table, our National Association was led by KAB's objectives and our Constitution. This highlights the salience of promoting innovation, engagement, enforcement and research that delivers effective partnerships through programs that ensure mutually beneficial environmental outcomes.



Unlike some other environment organisations, KAB's core business is based on collaborative partnerships, including with industry and government. This is reflected in the comment of our founder, Dame Phyllis Frost, that "if the battle against litter pollution is to be won, we must have these people (beverage producers) working in co-operation with us". KAB has a clear preference for policies that are practical, built on cooperative partnerships and engage the community positively rather than punitively or via heavy-handed regulation.

COAG's analysis suggests that all options being considered are likely to reduce litter and increase packaging recycling – the big differences are in the net costs / benefits and nature of the various approaches. KAB notes that the two container deposit systems (CDS) being considered are estimated to have a net cost of between \$1.4 – 1.8 billion, compared to Option 2(b)'s net cost of \$51m for similar environmental outcomes.

Option 2(b) is essentially an industry funded packaging stewardship scheme that builds on progress achieved to date (particularly through the Australian Packaging Covenant), and targets the biggest areas of opportunity for improvement – namely further reducing litter and increasing away from home recycling for all packaging materials. (Away from home recycling covers sports grounds, shopping strips, shopping centers, malls and also small commercial and industrial establishments)

KAB believes Option 2(b) is a credible recycling and litter reduction approach with great potential and relatively modest costs (with no cost to the community). We see it as an opportunity to build on the current targeted local and regional projects KAB and others have undertaken with much success over the past few decades and apply this practical knowledge on a national scale. It is consistent with the KAB history and culture of acknowledging the shared responsibilities of community, business and government. It also responds to our expectation that industry should lift their product stewardship sights with their products, without shifting large costs to the community. This is based on positive engagement and aims to leverage Australians' 'love of doing the right thing', which is something KAB fully supports.

Option 2b also has an inherently broad and expandable scope, consistent with COAG's stated focus on **all** packaging material that can be recycled and is in the litter stream, rather than just one narrow type of packaging. KAB sees greater potential for a flexible initiative like Option 2(b) to be potentially adapted in the future to tackle other emerging priority issues and opportunities in the litter and recycling space.

In assessing other options, KAB's National Association was concerned at the lack of innovation and guaranteed additional investment in recycling and litter reflected in some proposals. We are also concerned at the inordinate cost, which would ultimately be borne by the community, as well as the narrowness, lack of scope for partnerships and positive engagement opportunities reflected in the CDS and advanced disposal fee options.

KAB's National Association is committed to supporting Option 2(b) and working with communities, industry and government to refine the model over the coming months. We will continue to engage closely and constructively in the COAG process and look forward to a practical, efficient and effective national approach to improving all packaging recycling and reducing litter.

So given the above, KAB in partnership with the PSF will initially carry out pilot projects in Tasmania and Northern Territory over the next couple of years. (Projects in other States will be developed as finance allows.)

In Tasmania the project will clean up, prevent and reduce litter through the State by a coordinated campaign working with a range of community groups and their Councils, and linked to the Tidy Towns awards. In conjunction with reducing litter, the recovery of recyclable packaging materials in the away



from home area, KAB will work with and through Councils and their communities to identify priority areas and hot spots for the placement of recycling bins.

With regards to the Northern Territory the objective will be to clean up and reduce litter in (initially) at least five of the 20 identified Growth Towns in the NT, through commencing the implementation of the "Clean up Book" program. Provision of education and infrastructure with community and council involvement to prevent further littering and encourage resource recovery will be a priority.

Together with the above projects KAB will build on the long term communications platforms to launch ongoing awareness/education campaigns to change behavior through the LITTLE (Leading Integrated Taskforce Tackling Litter Everywhere) Committee. Ten children, one from each State and Territory, plus a Chair and Vice Chair have been selected to form a new national committee. The children will be instrumental in developing ideas to reduce littering across Australia and stop "Adults Littering"

We have exciting times ahead with the real possibilities of being part of introducing an Australia wide consistent approach to reducing litter (10% by volume) and improving recycling of all packaging material with set targets for beverage containers (70% in 5 years) .This will only be achieved by Industry, all levels of Government and our communities taking responsibility for their actions by working in co-operative partnerships.

Don Chambers

National Chair Keep Australia Beautiful,

Breakout Box:

What is Option 2(b)?

- Industry funded plan, proposed by members of the packaging and beverage industry;
- Additional investment comprising \$20m per year over 5 years, with further funding as necessary to achieve targets;
- Will increase total beverage container recycling to 70% over 5 years and 80% over 10 years, and reduce packaging litter volumes by 10% over 5 years and 20% over 20 years;
- Focused investments on largest improvement opportunities, namely increasing away from home beverage recycling and reducing all packaging litter;
- Funding to be split between a major expansion of public place recycling infrastructure (bins, signage), glass recycling infrastructure supporting education / public engagement (\$15 m per annum) and targeted anti-litter strategies focused on hot spots, education and enforcement (\$5 m per annum);
- COAG's cost/benefit analysis found Option 2(b) would have a net cost of \$51 m compared to the net cost of CDS of \$1,414 - \$1,761 m.
- Option 2(b) would generate 4.264m tonnes of recycling compared to the 4.313m tonnes generated by CDS (ie a 52,000 difference) and deliver similar litter benefits to a CDS, at 27 times less cost.