



The Australian Industry Group
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May 13, 2022

Department of Environment,
Land, Water and Planning (Victoria)

By Email: SUP.policy@delwp.vic.gov.au

RE: Draft Regulations to ban single-use plastic items in Victoria

The Australian Industry Group (Ai Group) welcomes the opportunity to provide brief feedback on the Draft Regulations to ban single-use plastic items in Victoria.

Ai Group is a peak national employer association representing and connecting thousands of businesses in a variety of industries and sectors across Australia. Our membership and affiliates include private sector employers large and small from more than 60,000 businesses employing over 1 million staff. Ai Group is a peak national employer association representing and connecting thousands of businesses in a variety of industries and sectors across Australia. Our membership and affiliates include private sector employers large and small from more than 60,000 businesses employing over 1 million staff.

General Comment:

- Ai Group supports nationally-consistent legislation and initiatives to reduce and/or better manage plastics. A national approach minimises negative impacts on businesses and improves environmental outcomes.
- Industry has been working hard to improve the sustainable design of plastic (and other) packaging, working towards the 2025 National Packaging Targets.
- While some differences in timing are expected between states, critical differences between legislation can pause or reverse environmental progress.
 - This is particularly applicable where changes result in a break-down of trust between industry (already working to one set of targets) and government(s). Anecdotally, this 'stop start' has left some members fairly questioning whether commencing anything voluntary towards agreed targets is worthwhile, given regulatory interventions by governments routinely disrupt and undermine the work, demand resources and drive-up costs.
 - Differences have scope to undermine economy of scale, in Australia's already small, isolated market.
- Ai Group encourages pragmatism around enforcement timeframes. This could involve staggered implementation to cease the supply of banned products to retailers on the specified date but provide a grace period for retailers to use up existing stock.
 - Ai Group has been advised that it is common for smaller retailers to be sold banned stock until the deadline, therefore sensible timeline implementations could help prevent large volumes from having to be landfilled.

Ai Group are encouraged by the fact that the draft regulations do, for the most part, align with existing bans in QLD, NSW, ACT and SA.

If you have any further questions regarding this submission, please contact our Advisor, Rachael Wilkinson (rachael.wilkinson@aigroup.com.au).

Sincerely yours,

A handwritten signature in black ink that reads "Louise McGrath". The signature is written in a cursive, flowing style.

Louise McGrath
Head - Industry Development and Policy
Australian Industry Group