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Department of Natural Resources and Environment Tasmania

RE: Phasing Out Single-Use Plastics in Tasmania Discussion Paper

The Australian Industry Group (Ai Group®) is a peak national employer organisation representing traditional, innovative and emerging industry sectors. We have been acting on behalf of businesses across Australia for 150 years.

Ai Group and partner organisations represent the interests of more than 60,000 businesses employing more than one million staff.

Our membership includes businesses of all sizes, from large international companies operating in Australia and iconic Australian brands to family-run SMEs. Our members operate across a wide cross-section of the Australian economy and are linked to the broader economy through national and international supply chains.

General Comments

Ai Group commends the Tasmanian Government for attempting to harmonise several of the categories covered in the consultation paper with other jurisdictions.

One glaring issue in the effort to harmonise the patchwork of state and territory regulations, is the inconsistent definition of items being banned. Ai Group urges Tasmania to try to align the definitions they are proposing to other jurisdictions already enforcing bans on said items.

Heavyweight plastic film shopping bags (with a thickness greater than 35 microns)

Ai Group is supportive of Tasmania aligning with other states and territories on this requirement, providing they are referring to shopping bags with handles.

Barrier/produce bags

Ai Group would like clarification if a Tasmanian ban would only cover food contact bags and if the ban would allow the use of certified compostable bags, which is not specified as an alternative in the paper. Produce bags play a role in reducing food spoilage and maintaining food safety.

SA and WA both allow for certified compostable produce bags.

Likewise, barrier bags used to contain chemical products are used to minimise leakage risk and contamination of recyclable outer packaging in transit (i.e. online orders).

Bread-tags

We would like clarification of the term and associated uses covered by this proposed ban.

Food supply-chain businesses use these tags (Kwik Lok tags) for produce bundling, which has different performance requirements, including the ability to withstand temperature changes and condensation. Currently, the alternate proffered in your paper does not fit the technical requirements of this usage.

Fruit stickers

Members do not object to bans on conventional fruit stickers, provided there is a reasonable transition time for scaling alternatives and for producers to implement systems changes.

Single-serve plastic condiment packages

The proposal to ban single-serve plastic condiment packages would have significant impact for many food businesses. These condiment sachets are used in prepackaged goods to separate ingredients, which allows for longer shelf-life in these products.



Lollipop sticks

Currently, only NSW is proposing to act on this item.

Ai Group would prefer this be addressed through national-level packaging reform. However, we would urge for any action taken by Tasmania to align with the working definition NSW is suggesting.

Expanded Plastic Packaging

We would urge the Tasmanian Government to consider the issues that arose in the Western Australian process. There are many legitimate reasons Expanded Plastics (EP) are used, including for products below the threshold of 45kg set forth by the APCO roadmap.

Our members typically use these materials for protecting fragile products or electronic/electrical goods. This is due to their:

- superior impact protection
- surface protection
- rigidity in humid conditions.

This is particularly important for high-cost goods, where damage during transit and storage is a costly problem.

While many of our members are making efforts to change product packaging where possible, it will take time for members to change packaging lines where alternates are not currently viable.

For some goods, manufacturers expect it will take time for existing/near-term stock with EP packaging to turn over in jurisdictions that have low purchase rates.

Plastic microbeads in personal healthcare items and cotton buds

Ai Group is supportive of the phase-out of plastic microbeads in personal healthcare products and plastic-stemmed cotton buds in line with existing bans in other jurisdictions.



Plastics with degradable additives and materials specified on page 23.

We are supportive of the phase-out of degradation accelerating chemicals. We support the exclusion of products that comply with AS4736-2006 and 5810-2010 for the ban as proposed.

Regarding proposed actions on polymer types (as opposed to additives as above), no other jurisdiction has proposed material bans beyond non-compliant. Ai Group would prefer any restrictions on materials come from a national level.

If you have any further questions regarding this submission, please contact our Advisor, Molly Knox (molly.knox@aigroup.com.au).

Sincerely yours,

A handwritten signature in black ink that reads "Louise McGrath".

Louise McGrath
Head - Industry Development and Policy
Australian Industry Group