



**Australian
Retailers
Association**

8 May 2020

NSW Department of Planning,
Industry and Environment
12 Darcy Street
PARRAMATTA NSW 2150

Via email: plastics.plan@environment.nsw.gov.au

ARA SUBMISSION TO THE REDIRECTING THE FUTURE OF PLASTIC IN NSW DISCUSSION PAPER

The Australian Retailers Association (ARA) welcomes the opportunity to comment on the New South Wales Government's Redirecting the Future of Plastic in NSW Discussion Paper dated March 2020 (Discussion Paper).

The ARA is Australia's largest retail association, representing the \$325 billion sector employing more than 1.3 million people. As the peak body for Australia's retail sector, the ARA represents more than 7,500 retailers across Australia.

The ARA appreciates the NSW Government's efforts to reduce unnecessary plastic consumption and waste and as an industry, we recognise the important role retailers, like other business, play in facilitating the move towards a more circular economy.

Achieving a balanced and effective plastic waste reduction strategy in NSW requires open collaboration between governments, industry and the community and the ARA welcomes the opportunity to engage further with NSW Department of Planning, Industry and Environment (Department) on measures to reduce dependence on single-use plastic products, while minimising the cost impact to business and consumers.

The ARA notes the intention of the NSW Government to phase out lightweight plastic shopping bags. However, it is important that any measures to phase-out the use of plastic bags carefully consider the difference between carrier and barrier bags. The ARA recommends that the NSW Government look towards the model adopted in Victoria which applies a 35 micron or less threshold to carrier bags and exempts barrier bags for fruit, vegetables, meat and fish due to the role they play in health and safety. A flexible approach, which accounts for the role barrier bags play in maintaining consumer confidence in the food supply chain, should be taken, particularly in light of the coronavirus pandemic (COVID-19).

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In developing a holistic strategy for reducing plastic consumption and waste, the ARA encourages the NSW Government adopt a harmonised approach with other states and territories through the Council of Australian Governments. A nationally consistent approach will help drive more productive outcomes and minimise costs associated with transitioning to alternative products, therefore reducing pass-through costs to customers. Greater alignment will also ensure that businesses operate on a level playing field and are not subject to a competitive disadvantage when compared to retailers in other jurisdictions. The ARA notes that the Queensland Government is also undertaking a consultation in relation to their plastics strategy and welcome efforts by both the NSW and Queensland Government to align on timeframes and requirements.

When considering an appropriate timeframe to phase out certain single-use plastics, the ARA asks that the NSW Government consider the significant impact COVID-19 continues to have on our members' operations and supply chains. As you are aware, COVID-19 has caused many retailers to temporarily close or shift how they conduct their business to comply with social distancing restrictions. Due to the degree of uncertainty and financial pressure placed on businesses during this time, the ARA recommends that the implementation of any measures be delayed until the impact of the crisis abates and business operations stabilise. This will ensure businesses can adjust their supply chains and comply with new requirements.

This Discussion Paper, together with the *20-Year Waste Strategy*, also presents a unique opportunity for the NSW Government to improve the way in which plastic waste is collected and recycled. Specific measures that could be implemented which would result in significant improvements include the introduction of kerbside collection infrastructure for soft plastics and organics and incentives for local re-processing and for using re-processed materials. The ARA supports efforts to develop the collection and re-use of soft plastics, as well as enhance local recycling and reprocessing capacity through greater investment or incentive schemes.

Finally, any measures to reduce plastic dependence and waste should be supported by a business and community education campaign funded by the NSW Government. Increasing awareness of the viable and cost-effective alternatives to single-use plastics will help build confidence and promote source separation and clear waste streams.

The ARA looks forward to continuing to engage with the Department to effectively reduce reliance on unnecessary single use plastics. If you have any questions regarding the ARA submission, please do not hesitate to contact me directly.

Yours sincerely,

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