

PHASING OUT SINGLE USE PLASTICS - RESPONSE TO ACT DISCUSSION PAPER

The Detmold Group (Detmold) is a global packaging manufacturer, based in South Australia. We are recognised as a leader in packaging sustainability, receiving multiple awards from the Australian Packaging Covenant Organisation (APCO) and from some of the world's largest foodservice brands. We strongly support the Government of the Australian Capital Territory pushing to take a global lead in the banning of unnecessary single-use plastic products.

Detmold supports similar programs in other states, Europe, China and the US.

We believe the ACT Government should legislate that all single-use carry bags, cups, straws, plates and grocery bags must be recyclable by 1st July 2020. By taking a strong stance on recycling, and working with the many organisations who want to create a better future, we believe that together we can inspire the population in pursuit of this important goal.



Responses to key questions

Do you agree with the consumer single-use plastic items listed on page 21 of the ACT Discussion Paper being considered as part of this paper? If so, which items do you think are the most important to address (e.g. plastic bags, straws, cutlery, disposable coffee cups, takeaway containers)?

Yes, Detmold believe single-use plastics are a significant problem in litter and marine pollution. Plastics should be diverted from landfill, however they are not being recycled at an acceptable rate in Australia today.

Detmold strongly support introducing measures to address single use straws and coffee cups. All acceptable alternatives should be recyclable or genuinely reusable. The measures should extend to all beverage cups (not just coffee) and include plates.

In order for the ACT Government to effectively introduce legislation that has an impact on single-use products, Detmold agree that the excluded items (such as sanitary applications) should be omitted due to the lack of viable sustainable alternatives, and we should focus on resolving the straws, cups, bags and plates in this round of intervention.

What regulatory or other approaches do you support to address consumer single-use plastic in the ACT? When do you think action is needed, and why?

Detmold support banning any single-use bags or plastic items that are not recyclable. We are also concerned about biodegradable, degradable and even compostable bags or single-use plastic items as these present a high risk to the environment in terms of microplastic residues and marine pollution. These 'bio' plastics are challenging for recyclers and none of them facilitate keeping material resources in use and contributing to a circular economy. Detmold believe genuinely reusable options and paper packaging are the solutions that should be endorsed.

We believe the ACT Government should legislate that all single-use carry bags, cups, straws, plates and grocery bags must be recyclable by 1st July 2020.

If you are an ACT based manufacturer, importer or retailer of consumer single-use plastic products, what cost and other impacts do you think need to be considered as part of this discussion?

As an Australian manufacturer and retailer of single-use packaging, the majority of packaging items that we supply are paper and board based and 100% recyclable through existing waste streams.

We offer recyclable alternatives for cups, bags, straws and plates today, and support Government intervention to drive the community towards these sustainable products. There are cost impacts in many situations but the costs are manageable and can often be reduced by careful limiting of the use of disposable items.

We have seen industry and consumers adapt to the lightweight plastic bag bans with minimal impact in many states now across Australia, and the same will happen with other product categories. By introducing legislation the Government will simply be providing the final additional push that industry need to switch to more sustainable packaging options. This is difficult for a single operator to implement when competing with many other retailers, but if entire territories or states shifts at once, no business is unfairly penalized.

Further:

By choosing recycling over composting the ACT Government will be showing true leadership. Only through recycling do we reduce the number of trees being cut down to make paper products, and only through recycling are we 'keeping products, components and materials at their highest utility(ii) which is fundamental to creating a circular economy.

Packaging is an acceptable filler in commercial compost, but PLA lined packaging slows the composting process(iii) leading to logistical and cost issues, and increasing the risk of releasing a product which contains microplastic residues into agricultural areas. In Australia, there is limited access to industrial composters, meaning that composting is not a viable commercial solution for packaging, or a globally scalable solution (iv) (v). If we are going to use legislation to drive an environmental outcome, let's target the solution which follows the 'imperative to keep material resources in use, or 'circulating' for as long as possible' (vi), and that is recycling paper back in to paper products and plastic back in to plastic products, wherever possible.

Detmold is willing to take a leading role working with businesses, Government and other motivated organisations to implement this change. We are uniquely placed to support the transition with our global exposure to sustainable packaging solutions, our relationships with thousands of foodservice, grocery and retail brands, and our genuine commitment to making a better Australia.

ii Green Industries SA 'Potential Benefits of a Circular Economy in South Australia' (2017)

iii Field Study: Foodservice Packaging as Compost Facility Feedstock October 2, 2018, Compost Manufacturing Alliance

iv Introducing compostable packaging before processing systems are in place is creating a problem not solving one', AUCKLAND, May 30, 2018, The Packaging Forum



v The compostable cup you can't compost, and the trouble with our recycling system, By Liam Mannix, Sydney Morning Herald, 1 July 2017

vi Green Industries SA 'Circular Economy for SA Summary' 2017

Why Bans on Specific Non-Recyclable Packaging Is Appropriate

There are multiple, commercially viable, recyclable solutions available for each of the products for which Detmold supports specific enhanced legislation. A simple (but decisive) step to legislate recyclable options would be the catalyst needed to convince brands and retailers to change from single-use plastics to recyclable alternatives.

Our recommended list of products that should be specifically identified in recycling legislation are:

Item	Banned 	Allowable 
Carry Bags	Lightweight plastic (already in place) Heavy-weight plastic (30-100um) Plastic/paper laminates	Paper bags Innovative materials where the retailer can provide a recycling guarantee
Cups	PE Lined Paper (Hot and cold cups) PLA Lined Paper PLA Plastic Cups	Recyclable Paper Cups (where retailer provides recycling guarantee) PET Plastic Cups PP Plastic Cups
Straws	Plastic Straws PLA and biplastic straws	Paper (repulpable) straws Non-plastic plant based materials (pasta, bamboo, wood)
Plates	Plastic plates Plastic coated plates	Paper Plates Moulded pulp
Grocery Bags	LDPE Bags HDPE Bags	Paper Innovative materials where the retailer can provide a recycling guarantee

Detmold believe PLA straws, compostable plastic carry bags and grocery bags all present the same risk for marine pollution, litter and wildlife as other plastics, and therefore should not be approved alternatives.

PLA lined paper cups and PLA plastic cups are not recyclable and do not meet circular economy principles. Whilst Detmold pioneered compostable coffee cups in the Australian market, we no longer believe they are a leading solution for the coffee cup challenge facing us today and they do not reduce the need for more trees. Instead Detmold offer the RecycleMe™ cup solution which utilizes a next generation coating and provides a collection system which guarantees that every cup collected will be recycled.

The RecycleMe™ lining reduces plastic use by over 40% in coffee cups (reducing plastic content from 5% to 3%), and it is easily removed during the re-pulping process making RecycleMe™ coffee cups a valuable source of high quality bleach paper fibre, which is in great demand in Australia. Coupled with the comprehensive RecycleMe™ cup collection service, and the many partnerships with coffee and foodservice businesses across Australia, there is finally a viable, innovative solution for disposable coffee cups going to landfill.

Detmold support the use of the APCO Towards 2025 definitions for recyclability, the use of the Australasian Recycling Label (ARL) to provide clarity for disposal. We also support consideration of a bold approach that requires all retailers to accept back all used packaging that is not recyclable through other widely available streams, and that those retailers are required to ensure that this returned packaging is disposed of appropriately. Minimum targets could be set and enforced for businesses to divert their waste (include that returned to them by customers) from landfill. Over time this waste collection supply chain will become a valuable, clean and sorted resource stream.

The ACT Government must ensure that any of the solutions that are supported by this new legislation are also considered from an ethical and legal sourcing and manufacturing standpoint. We must protect against introducing products which meet the end of life goals, but are made from controversial forestry sources or with questionable employment practices. Detmold has FSC™ and PEFC™ sustainable forestry certifications and achieves 'A' ratings in Supplier Workplace Accountability audits in both its South Australian manufacturing facilities and its global operations.

Implementation

Detmold is well placed to assist the ACT Government to work with industry and other organisations to successfully introduce single-use plastic bans. Detmold already works closely and collaboratively with APCO, Planet Ark and other packaging companies. We are on the global Sustainability Leadership Council for McDonalds, we work on sustainability strategy and packaging planning with Hungry Jacks, KFC, On The Run, Coles, Woolworths, Subway, Nandos, Country Road, Witchery and many other leading retailers and consumer good brands. We work with collection partners, recyclers and paper mills globally and are happy to collaborate right across all sectors to assist the ACT Government to implement the vision of progressively removing single-use plastic products and becoming a world leading circular economy.