

1 CROPLIFE AUSTRALIA

CropLife Australia is the national peak industry organisation representing the agricultural chemical and plant biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers, formulators and suppliers of crop protection products (organic, synthetic and biologically based pesticides) and agricultural biotechnology innovations, including GM crops. CropLife’s membership is made up of both large and small, patent holding and generic, and Australian and international companies and accordingly, CropLife only advocates for policy positions that deliver whole of industry and national benefit.

The plant science industry provides products to protect both crops and Australia’s vast, biodiverse natural spaces against damaging insects, invasive weeds and diseases that pose a serious threat to the nation’s agricultural productivity, sustainability and food security. The plant science industry directly enables more than \$20 billion annually to Australian agricultural production and directly employs thousands of people across the country.

Furthermore, CropLife Australia is a national and international leader in industry-led product stewardship and recycling initiatives, with nearly three decades of experience in developing and delivering successful stewardship programs.

CropLife welcomes the opportunity to provide comments regarding the Standing Committee on Climate Change, Energy, Environment and Water inquiry into plastic pollution in Australia’s oceans and waterways. As a world-leader and significant contributor to Australia’s genuine recycling efforts, it is essential to recognise and champion the sustainability achievements of Australia’s plant science and agricultural industries.

2 SUBMISSION

Introduction

The first step in tackling plastic pollution in our oceans and waterways is to stop it from entering in the first place. The consequences of improper disposal or mismanagement of plastic waste are substantial – nearly 80 per cent of the plastic in our oceans comes from land-based sources, the negative environmental impacts of which are well documented.^{1,2,3}

In recognising this challenge, CropLife Australia and its members have been world-leaders in their whole-of-lifecycle commitment to product stewardship. This includes the development of responsible collection and recycling pathways for the packaging of plant-science industry products. This submission will address inquiry TORs regarding:

- the effectiveness of the Australian Government's engagement with states and territories, industry and non-government organisations to reduce plastic pollution particularly in oceans and waterways
- the effectiveness of community campaigns to reduced plastic pollution particularly in oceans and waterways and encourage the use of alternative materials
- any other relevant matters.

CropLife and its members are world leaders in whole-of-lifecycle product stewardship

CropLife Australia has a successful history of developing and delivering world-leading industry-led product stewardship initiatives through its wholly owned not-for-profit stewardship organisation, Agsafe, which was established in 1993. Agsafe delivers CropLife's stewardship initiatives **drumMUSTER**[®] and ChemClear[®], in addition to providing training for the safe and responsible transport and storage of agricultural and veterinary chemicals.

drumMUSTER[®] is a world renowned agricultural and chemical container collection and recycling program. It was launched in 1999, long before the introduction of any government regulatory requirements. In 2022, **drumMUSTER**[®] collected its 40 millionth plastic container, recycling over 58,000 tonnes of plastic into products including wheelie bins, road signs and bollards. Plastic that would have otherwise been buried, burnt or sent to landfill. Importantly, CropLife's code of conduct for members mandates that all CropLife Australia members must participate in **drumMUSTER**[®] and other CropLife product stewardship programs.

¹ Department of Climate Change, Energy, the Environment and Water, 'Impacts of Plastic Debris on Australian Marine Wildlife', accessed 20 December 2022, <https://www.dcceew.gov.au/environment/marine/publications/impacts-plastic-debris-australian-marine-wildlife>.

² Our World in Data, 'Where Does the Plastic in Our Oceans Come From?', Our World in Data, 1 May 2021, <https://ourworldindata.org/ocean-plastics>.

³ UN Environment Programme, 'Plastic Pollution', UNEP - UN Environment Programme, 8 February 2022, <http://www.unep.org/plastic-pollution>.

Not only does **drumMUSTER**[®] support local recycling processors, but the initiative also engages over 140 community groups across Australia and supports their fundraising efforts. Since **drumMUSTER**[®]'s inception, community groups have raised over \$1,200,000.⁴ Industry is best-placed when it comes to understanding industry-needs. Through Agsafe, the plant science industry has on ground and local contact points in over 830 **drumMUSTER**[®] collection sites nationwide. Embedding **drumMUSTER**[®] into local agricultural communities has enabled the program to continually grow as community awareness and understanding about recycling has increased. This local-level approach to effective management of plastic waste is also supported by research conducted at CSIRO where Dr Kathryn Willis noted that "*decisions made on the ground, at local management levels, are crucial for the successful reduction of coastal plastic pollution*".⁵

ChemClear[®] is an initiative that enables the safe and responsible removal of obsolete, expired or damaged agricultural and veterinary chemicals off farm and out of rural communities, allowing farmers to dispose of these unwanted products in a safe and sustainable manner. ChemClear[®] has been particularly critical during clean-up events following natural disasters. As an example, more than 9,000 litres of agricultural and veterinary chemical were removed from flood affected properties in NSW and QLD in 2022.

The 2018-19 Australian Plastics Recycling Survey reports that just seven per cent of agricultural plastic is being recycled.⁶ While this figure is concerningly low, the **drumMUSTER**[®] program accounts for over one-third of all agricultural plastics being recycled in Australia, demonstrating that when industry-led initiatives are made available, Australian farmers are enthusiastic adopters.

Importantly, **drumMUSTER**[®] only collects hard plastics (HDPE) and as such, there is opportunity to increase agriculture's recycling rate by providing farmers with access to recycling options for soft plastics (LDPE). Currently, these largely end up in landfill, are destroyed in an environmentally unfriendly manner or remain as on-farm waste.

⁴ 'Community Groups', Drummuster, accessed 13 December 2022, <https://www.drummuster.org.au/whos-involved/inspectors/>.

⁵ Imma Peretto, 'Australia's Coastal Plastic Pollution Decreased by 29%', 9 June 2022, <https://cosmosmagazine.com/earth/australia-coastal-plastic-pollution/>.

⁶ Australian Government Department of Agriculture, Food and the Environment, '2018-19 Australian Plastics Recycling Survey - National Report', accessed 29 March 2022, <https://www.awe.gov.au/environment/protection/waste/publications/australian-plastics-recycling-survey-report-2018-19>.

Supporting industry-led initiatives

Continuing with CropLife Australia and its members' tradition of developing industry-led solutions, CropLife and its members, together with the Australian Seed Federation, developed bagMUSTER®, Australia's first not-for-profit, genuine collection and recycling initiative for plastic agricultural input bags. bagMUSTER® is a hybrid program, informed by learnings from CropLife's nearly 30 years of experience in delivering **drumMUSTER®** and ChemClear®. This hybrid approach will take the best and most suitable components of **drumMUSTER®** and ChemClear® to deliver an industry-led and fit-for-purpose product stewardship solution for agricultural input product bags, like seeds and pesticides.

CropLife Australia is seeking government assistance to move bagMUSTER® from a proof-of-concept to pilot phase. A contribution from government would make possible the initial collection, transport and possible recycling of industry bags. Following the pilot phase, the fully operational bagMUSTER® program will be completely industry-funded going forward.

CropLife Australia approached the previous Federal Government through the Product Stewardship Investment Fund, which seeks to reduce waste and prevent harmful materials from ending up in landfill or increase recycling and the recovery of valuable materials and accelerate a circular economy. This Fund has supported scoping and assessment projects such as '*A Circular Economy for Silage Wrap*' and '*National Non-Packaging Agricultural Plastics Stewardship Scheme*', who each received nearly \$1 million to assess or scope the current situation. The scoping and development of bagMUSTER® was funded by CropLife and its members who have invested over \$250,000. We are not seeking financial assistance to scope or assess - we are ready to launch a fully scoped initiative. It is disappointing that there exists no flexibility within grant programs to support ready-to-launch initiatives like bagMUSTER®.

The 'Voluntary Product Stewardship Accreditation' initiative has also hindered industry-led product stewardship initiatives.⁷ As noted, genuine product stewardship programs such as **drumMUSTER®** were established long before any legislative requirements or any government product stewardship priorities were identified. Although perhaps inadvertently, the launch of this accreditation process has dismissed existing and successful initiatives that either chose not to or were unaware of the new accreditation scheme. It is concerning to see that stewardship initiatives that are not genuine recycling programs have received accreditation. This highlights an opportunity for targeted government funds to support the establishment of solutions where industry has already invested in the development and feasibility strategy.

⁷ Department of Climate Change, Energy, the Environment and Water, 'Product Stewardship Accreditation', accessed 12 December 2022, <https://www.dcceew.gov.au/environment/protection/waste/product-stewardship/product-schemes/voluntary-product-stewardship>.

The Australian Packaging Covenant Organisation: an opportunity to support industry-led and genuine efforts

Previous management of the Australian Packaging Covenant Organisation (APCO) demonstrated a lack of engagement with industry and instead of making it easier for companies to address plastic pollution, APCO made it more burdensome. As an example, CropLife member companies received tone-deaf letters from APCO demanding they become APCO members (even though this is not an obligation under the co-regulatory arrangement) and failed to acknowledge the substantial commitments CropLife and its members have to product stewardship, particularly in the context of packaging. It came as no surprise that CropLife and its members' perceptions of APCO were validated following the recent review into the co-regulatory arrangement under the *National Environment Protection (Used Packaging Materials) Measure 2011*, (the Review) completed in September 2021 and the final report made available in February 2022.⁸

A particularly relevant recommendation from the Review highlighted the need to “*Coordinate and strengthen monitoring and enforcement of a reformed used packaging scheme.*” At present, the co-regulatory arrangement requires brand owners to report to their relevant jurisdiction, which may be multiple for those who operate nation-wide businesses, or to become a member of APCO. This co-regulatory arrangement is complex, burdensome on those who are trying to do the right thing and in fact, makes it easier for free riders to gain a competitive advantage and avoid compliance or enforcement. Many stakeholders responding to the Review noted that a coordinated approach to monitoring and enforcement would reduce the free rider effect by ensuring that liable parties are accountable to the same body.

Moving forward, APCO is well placed to work collaboratively with industry to augment existing or develop new product-stewardship initiatives. A collaborative approach between APCO and industry would also be synergistic with the serious findings and recommendations corresponding to the Review. There is an opportunity here for the Federal Government and APCO to revise and centralise the used packaging scheme to adequately address the recommendations in the Review.

⁸ Department of Climate Change, Energy, the Environment and Water, 'Australian Packaging Covenant', accessed 13 December 2022, <https://www.dcceew.gov.au/environment/protection/waste/plastics-and-packaging/package-covenant>.

Recycling technology: the limiting step

CropLife's **drumMUSTER**[®] program demonstrates that when a genuine and viable recycling initiative is made available, Australians are quick to adopt it and show their on-going support.

The recent announcement that the REDcycle scheme, an Australian supermarket soft plastic recycling scheme, was suspended "*as a result of a lack of recycling infrastructure in the soft plastic sector*" is a clear demonstration that one of the most significant hurdles to the proper management of soft plastics is the lack of recycling technology.⁹

CropLife acknowledges efforts by all Australian governments to increase the establishment of recycling facilities through initiatives such as the Recycling Modernisation Fund. Governments, however, must recognise that, to date, these efforts have not kept pace with Australia's growing interest and demand for recycling options. In line with this, full implementation of the Australian Packaging Covenant and other relevant waste and recycling regulations should remain cognisant of the availability of compliant options i.e., if recycling technologies are not commercially available for woven low-density polyethylene, brand owners who have no other option but to use this plastic polymer should not be penalised.

⁹ 'Shoppers Told to Put Plastic Bags in the Bin after Suspension of REDcycle's Soft Plastics Recycling Scheme', *ABC News*, 9 November 2022, <https://www.abc.net.au/news/2022-11-09/redcycle-soft-plastics-recycling-program-suspended/101632220>.

3 CONCLUSION

CropLife Australia is pleased to provide these comments to the Standing Committee on Climate Change, Energy, Environment and Water. The world-leading role Australia's plant science sector has played in the development and implementation of genuine product stewardship initiatives, complemented by the enthusiasm of the Australian agriculture industry to participate, should be highlighted and held-up as a case study example of how industry-led initiatives can work to address shared environmental stewardship challenges. Importantly, as Australian agriculture continues to work towards producing \$100 billion in farm gate output by 2030, and thus, the likely increase in product packaging, it is imperative that governments recognise the value of industry-led product stewardship initiatives and work collaboratively with industry to augment these programs and not hinder them.