



Submission to the Phasing Out Single-Use Plastics in Tasmania Discussion Paper

The AIIA is Australia's peak representative body and advocacy group for those in the digital ecosystem. The AIIA welcomes the opportunity to contribute to the consultation on Tasmania's initiative to phase out single-use plastics.

To facilitate smooth integration and reduce regulatory burden on businesses, we strongly recommend aligning Tasmania's phase-out program with the Australian Packaging Covenant Organisation's (APCO) Expanded Polystyrene (EPS) phase-out scheme. APCO is the entity in charge of managing and administering the Australian Packaging Covenant (the Covenant), which is a national regulatory framework under the National Environment Protection (Used Packaging Materials) Measure 2011 (NEPM). This framework defines the collective responsibility shared by governments and businesses across Australia in managing the environmental impact of packaging. This pivotal role bridges industry participants along the packaging supply chain with Commonwealth.

Specifically, we recommend that the alignment include consideration of exclusions, such as EPS used in business-to-business packaging and specialised packaging applications, which are currently exempt under the APCO guidelines. Business-to-business packaging is managed through existing company EPS recycling programs and the specialised packaging refers to products where there is not currently a suitable alternative to EPS due to the fragile nature or weight of the product.

A unique regulatory approach in Tasmania would be unworkable, as it is not feasible for companies to customise packaging to comply with the requirements of a single jurisdiction. This could result in products breaching Tasmania-specific regulations or becoming unavailable in the state, ultimately limiting consumer choice for Tasmanians. Harmonising Tasmania's approach with the APCO framework will promote greater regulatory coherence and facilitate a smoother transition for affected businesses.

Yours sincerely
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