



Australian National
Retailers Association
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Senior Manager
ACT Sustainable Waste Strategy 2010–2025
ACT Department of Environment, Climate Change, Energy and Water
DECCEW GPO Box 158
Canberra ACT 2601
Via email: environment@act.gov.au

Dear Sir / Madam,

Re: draft ACT Waste Management Strategy 2010 – 2025

The Australian National Retailers Association (ANRA) represents the leading national retailers in Australia, across the full range of retail products and services. Members of the Association include Australia's most trusted household names in supermarket chains, department stores and specialty retailers. Combined ANRA members employ over 450,000 people and account for around \$100 billion in annual turnover.

ANRA welcomes the opportunity to provide feedback on the draft *ACT Waste Management Strategy 2010 – 2025* (the Strategy).

In relation to 1.2 *Ban on single-use plastic shopping bags*, ANRA notes that the *Plastic Shopping Bags Bill 2010* was passed in December 2010. The Act will commence implementation on 1 July 2011, with a full ban of plastic shopping bags from 1 November 2011.

ANRA (along with the majority of ACT residents)¹ prefers voluntary measures that are shaped around assisting consumers in making informed choices regarding the use of plastic shopping bags and therefore remains opposed to the ban of single use plastic shopping bags in the ACT. We are pleased, however, that the ACT will have similar requirements to that which exist in South Australia. This approach ensures that there is consistency across jurisdictions that choose to ban plastic bags and will minimise the regulatory compliance burden on national retailers. In addition, it is critical that any ban in relation to plastic bags remains applicable to all businesses, both large and small.

In light of a plastic bag ban, ANRA iterates the importance of a comprehensive community education and awareness campaign on the bag ban. The comprehensive South Australian Government education and awareness campaign, Government Hotline and byobags.com website were very helpful in minimising customer complaints directed at our store team members and we strongly advocate a similar approach in the ACT.

¹ Only one-third of ACT households support an outright ban of single-use shopping bags. (Manidis Roberts (2009), *Plastic Bags Community Consultation*). ANRA acknowledges that 45% of those surveyed at shopping centres supported the ban, but the 'self-selection' mechanism for recruiting survey participants raises doubts over potential sample bias.

ANRA members are part of broader efforts to minimise packaging, where feasible and cost effective, and therefore supports 1.3 *to pursue reduced packaging*. This is reflected in ANRA's status as a member, alongside the ACT Government, of the Australian Packaging Covenant.

ANRA also supports 2.1 *efforts to assist recycling at commercial premises*, especially where businesses are able to benefit from lower waste disposal costs (which are ultimately passed on to consumers in the form of lower prices). ANRA members are also working with the community to minimise waste in other practical ways, such as through food rescue programs.

ANRA members are advocates of consumers making informed choices. ACTSmart Office and Business recycling branding will also allow consumers to make informed choices with respect to those businesses behaving in a responsible manner.

ANRA's support for 2.4 *the provision of free drop-off facilities for electronic waste* remains contingent on the final details of the scheme. Overall, ANRA is supportive of the concept of product stewardship and the responsible disposal of products once they come to the end of their life. However, the success of such schemes depends on them being able to be practically implemented.

In general, ANRA favours industry-driven schemes. By their nature, industry-developed schemes tend to best integrate with existing operational parameters and take into account these constraints.

Some international product stewardship programs involve retailers acting as collection points. When designing schemes in Australia there needs to be consideration around the practical impacts of this process. Some potential collection points may be suitable for some products but for others this may conflict with existing Occupational Health & Safety laws, noise limitations and/or planning provisions – particularly if the goods being collected are bulky (as in the case of televisions and computers) and not regularly collected.

Indeed, modern Australian retailers run just-in-time delivery systems and no longer have large back areas that could be used as storage areas. Consequently, the ability of retailers acting as a collection point for bulky items like televisions and computers is very limited in the case of facilitating the collection of e-waste on specific date(s) in conjunction with local waste management services, to almost non-existent in the case of accepting ad-hoc e-waste deposits from the community. ANRA believes the role of retailers is better suited as an information channel for manufacturers to reach consumers, rather than acting as collection points.

Thank you for considering ANRA's views on the Strategy. If you have any further questions please contact Mr Russell Goss, Policy Manager, on (02) 8249 4520 or at rgoss@anra.com.au

Yours sincerely,



Margy Osmond

Chief Executive Officer