



**CONSERVATION  
COUNCIL** ACT REGION

## Submission to the City and Environment Directorate

# Problematic Products and Single-Use Plastic Reduction Discussion Paper

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30 April 2026

The Conservation Council ACT Region is the peak body for environment and climate groups in the ACT Region. We represent close to 50 member groups, bringing together a united voice on environment and climate issues to Government, business and community.

Since 1981 we have been at the centre of the region's most important wins for wildlife, bushland, climate and communities. As a hub for the ACT Region's environment and climate movement and a not-for-profit, non government organisation, we run campaigns, promote and upskill local groups, undertake research, advocate passionately, and engage and inform our community.

### **Support**

The following groups have agreed to be recognised here as supporting this submission:  
**Canberra Environment Centre, SEE-Change WasteLess Group**

### **For further information please contact:**

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## Executive Summary

The Conservation Council of the ACT (the Council) thanks the City and Environment Directorate for the opportunity to comment on the Discussion Paper, [A Circular Future for the ACT: Problematic Products and Single-Use Plastic Reduction](#). The Council also wishes to express its support for submissions made by the following organisations:

- SEE-Change WasteLess Group
- Boomerang Alliance
- Environmental Defenders Office

In recent years, the ACT has been a leader amongst Australian jurisdictions in reducing single-use plastics, following successive bans from 2021 to 2024 under the *Plastic Reduction Act 2021* (now known as the *Circular Economy Act 2023*). The Council welcomes the Government's continued consultation on options to further reduce single-use plastics in the ACT, and **supports the ban of the 14 single-use plastic items identified in the discussion paper.**

In addition to strong regulation, we support the Government's approach of pursuing the cultural shift and circular systems needed to support reuse and reduce waste. However, we encourage the Government to strengthen their ambition and action beyond '*continuing to investigate whether these opportunities could work locally.*'<sup>1</sup> As a small jurisdiction with a relatively environmentally conscious population, the ACT can and should be a leader in implementing programs to reduce plastic waste. For instance, the ACT hosts many major events where 'single-use plastic-free' approaches could be implemented, for example, the Multicultural Festival, Floriade, or Enlighten. These events attract many interstate visitors and represent important opportunities for the ACT to demonstrate its environmental leadership on the national stage.

We recommend that the ACT Government:

- **Immediately ban all 14 single-use plastic items** identified in the discussion paper, prioritising items where reusable alternatives are readily available.
- **Introduce "reuse-first" regulation** for the hospitality sector, including requiring reusable serveware for dine-in customers, a waste levy for businesses exclusively using single-use packaging, and waste minimisation requirements for new cafés.
- **Phase out additional problematic items** including helium balloon releases and cigarette filters.
- **Actively support a mandatory national Extended Producer Responsibility (EPR) scheme** for packaging by 2026.
- **Continue to fund and partner with community organisations** that deliver circular economy programs, recognising their critical role in achieving government outcomes.

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<sup>1</sup> Pg 10,

[https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/5817/7215/2190/Discussion\\_Paper\\_-\\_Problematic\\_Products\\_and\\_Single-Use\\_Plastic\\_Reduction.pdf](https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/5817/7215/2190/Discussion_Paper_-_Problematic_Products_and_Single-Use_Plastic_Reduction.pdf)

The Council also strongly supports the work of the Boomerang Alliance, who are calling for:

- A mandatory EPR scheme for packaging, introduced by 2026, requiring producers to fully fund the collection and recovery of their packaging, with mandatory reduction and reuse targets. Such a scheme would actualise Strategic Objective 1 of the ACT Circular Economy Strategy and Action Plan 2023-2030, to 'Grow Extended Producer Responsibility'.<sup>2</sup>
- Fast-tracking a national collection scheme for soft plastics, ensuring producers cover the cost of recycling for all soft plastics.
- Continued regulation by Commonwealth, State, and Territory Governments to phase out problem plastics while mandating reusable packaging systems to reduce waste at the source.
- Requiring all major stadiums and public events to eliminate single-use packaging by switching to reusable cups and containers.

### *Building a Circular Economy - The Role of Community Organisations*

Community groups in the ACT are already undertaking significant work to build a local circular economy, for example:

- **SEChange** is a grassroots sustainability organisation that supports a range of activities aimed at transforming waste management and avoidance in our region, including operating a Reusables Library, providing community education and resources on reducing single-use plastic use, and assisting with waste management at local events.
- **Canberra Environment Centre** is an environmental education organisation working to build a circular economy, including hosting workshops on practical household sustainable living topics.
- **Lids4Kids Australia** is a national charity based in Canberra that operates the Zero Waste Warrior program, enabling individuals and businesses to recycle plastic bottle lids, plastic bread tags and other hard-to-recycle plastic items, which are repurposed as furniture. Lids4Kids also operates a Community Recycling and Education Hub in Fyshwick, providing a space for social inclusion and meaningful volunteer work through plastic lid recycling.
- **The Canberra Food Co-op** is a community-owned and operated, single-use plastic-free bulk grocery store, cafe and community events hub.

It is vital that the government continues to work with these community organisations and provides the financial support needed for their long-term operation. Community-based organisations play a pivotal role in delivering government outcomes through the trust we have built over many years, the relationships and volunteer networks we maintain, and our ability to deliver place-based programs in a nimble, cost-effective, and impactful way.

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[https://www.cityservices.act.gov.au/\\_data/assets/pdf\\_file/0020/2272331/ACT-Circular-Economy-Strategy-access.pdf](https://www.cityservices.act.gov.au/_data/assets/pdf_file/0020/2272331/ACT-Circular-Economy-Strategy-access.pdf)

## *The Case for Action - Climate and Health Impacts*

Australia is the second biggest generator per capita of single-use plastic waste in the world.<sup>3</sup> The impacts of single-use plastics are significant and well-documented, affecting the health of our ecosystems, climate and populations. In the ACT, there is direct legislative interdependence between the health of the environment and the rights of ACT residents. The *Human Rights Act 2004 (ACT) (HR Act)* enshrines the right to a clean, healthy and sustainable environment. The inclusion of the right to a healthy environment in the HR Act requires ACT Ministers, public authorities, and officers to act in accordance with that right. The Council considers the Government should enact this legislation through a further single-use plastics ban.

Synthetic plastics are derived from petrochemicals, such as crude oil and natural gas. In addition to this, 'virgin' plastic production requires additional fossil fuels for heating during the refinement process<sup>4</sup>. By 2050, the emissions from plastic production are expected to reach approximately 3 Gt/year and thus account for 10–15% of the CO<sub>2</sub> emission budget in 2050 set by the Paris Agreement<sup>5</sup>, which is simply unsustainable. This is particularly relevant in the current fuel crisis, as when oil and energy markets fluctuate, the plastic production industry is affected due to shared use of petrochemicals<sup>6</sup>. The whole supply chain then feels the effects of these volatilities, including not only single-use plastic manufacturers, but all of the subsequent businesses in the supply chain and ultimately, the consumer. Banning single-use plastics and replacing them with reuse systems will protect Canberrans from future market volatilities.

Another factor in single-use plastic consumption is the proliferation and harmful effects of microplastics in humans. They act as carriers of both harmful chemicals and pathogens to the body. One comprehensive review found that microplastics were present in 8/12 of human organ systems, including cardiovascular, endocrine, and reproductive<sup>7</sup>. This is especially relevant to single-use plastic production and use, as single-use plastics such as HIPS plastic (used in general packaging) and PETG (clear plastic used in food packaging) have been found to require extremely low abrasion to break down into microplastics<sup>8</sup>. Regulating single-use plastics is a key measure to reduce the risks microplastics pose to the health and wellbeing of our community.

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<sup>3</sup> <https://wwf.org.au/get-involved/plastic-pollution/>

<sup>4</sup> <https://www.bpf.co.uk/plastipedia/how-is-plastic-made.aspx>

<sup>5</sup> <https://www.nature.com/articles/s41578-021-00407-8>

<sup>6</sup>

<https://theconversation.com/heres-how-using-more-recycled-plastic-could-ease-the-pain-of-oil-shocks-280591>

<sup>7</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC11342020/>

<sup>8</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0048969721075380>

## Supporting Reuse in the ACT

### 1. What factors need to be considered to support more reuse in the ACT?

Supporting further reuse will require the ACT Government to take a systems approach to reducing and eliminating single-use plastics and other problematic packaging, as it moves towards achieving a circular economy. Obstacles present in the ACT context include:

- Consumer behaviours: entrenched habits of using single-use plastics and the perceived and actual inconveniences associated with switching to reusables.
- Confusion regarding compostables: many consumers assume ‘compostables’ are a suitable alternative to single-use plastic items, however compostable items cannot be placed in FOGO bins in the ACT, or composted in home-composting systems, and instead contaminate recycling bins.
- Lack of appropriate infrastructure to facilitate reuse and recycling, for instance, soft plastic recycling facilities.
- Lack of interest from hospitality businesses to invest in the costs of a reuse system: including the initial upfront costs of purchasing a supply of reusable cups or installing a dishwasher.

A key structural driver of single-use waste in the ACT is the growing number of hospitality businesses operating on a takeaway-only or takeaway-dominant model. These businesses are inherently reliant on disposable packaging and undermine broader efforts to normalise reuse. The ACT Government should explicitly address this through policy mechanisms that shift the default away from single-use consumption. Without intervention, reuse systems will remain optional and marginal rather than becoming the norm. Evidence from behavioural policy shows that default settings strongly shape consumer behaviour; therefore, reuse must be embedded as the default option rather than a voluntary add-on. For example, the Government could introduce “reuse-first” regulation, including:

- Requiring dine-in customers to use reusable service-ware. Where seating is available, reusable service must be the default.
- Introducing a waste levy for businesses that exclusively use single-use packaging, or instead, requiring them to participate in an approved reuse scheme.
- Requiring new cafés to demonstrate waste minimisation strategies, or provide space and infrastructure for reuse (i.e dishwashing, return points).

Reuse systems for food and beverage packaging are often most successful when used in controlled settings, including sports stadiums, offices, events, and public facilities. System designs should include product designs for a minimum number of reuse cycles, with suitable point of sale and collection arrangements to ensure consumers are incentivised to return and/or reuse the packaging (for instance, convenience, deposit, or penalty systems). Reuse systems also often require commercial washing facilities and consideration of logistics to ensure containers are returned for reuse. The ACT Government should invest in offering the infrastructure and appliances needed for collection, cleaning and redistribution of reusable products, for instance, through offering a portable dishwasher service.

## **2. What areas/items should the ACT target for reuse?**

The Council considers that the ACT Government should target the 14 items listed in the discussion paper for reuse. In particular, we support the prioritisation of the following single-use items for reuse, as outlined in the SEE-Change WasteLess group submission:

- Plastic barrier bags
- Coffee cups, lids
- Plastic cold cups
- Plastic bowls with lids

See Question 6 for further details on recommendations and alternatives for these items.

In collaboration with other jurisdictions, the ACT should also consider phasing out additional products considered to be problematic. For example, whilst paper/cardboard can be recycled, these materials still represent a single-use resource that could be avoided or reduced. Many paper products also still require plastic linings or aqueous dispersion materials that contain plastics.

## **3. What kind of incentives/disincentives do you think could be most effective to transition away from a single-use culture, towards normalising reuse in the ACT?**

A combination of disincentives for single-use plastic consumption should be combined with incentives for reuse and recycling. There should be clarity regarding who the target audience is for such measures, for instance, the individual consumer or business.

Firstly, individual consumer behaviour could be targeted through strategies such as:

- Deposit-Refund Schemes providing direct financial return for consumers, rewarding participation, and increasing collection rates.
- Businesses (coffee shops, grocery stores, restaurants) offering discounts for reusables, incentivising customers to bring their own bags, cups, containers.
- Tax reductions or subsidies for sustainable products; with an incentive via price advantage.

At the community level, local initiatives can amplify the benefits of individual impacts, generate cultural change, and make it easier for people to engage with reducing use of plastics. For example, the ACT Government should introduce public awareness campaigns to encourage reuse and support local businesses to prioritise plastic reduction strategies, following the models of zero-waste stores and restaurants such as the Canberra Food Co-op.

For hospitality businesses, requiring dine in customers to use reusable service ware, encouraging consumers to 'dine in' for a discount, or providing discounts for consumers bringing their own reusable cups could provide financial incentives for reuse. Similarly, 'swap and go' systems for cups, such as mug libraries, Good Cup (which utilises a deposit), or Cercle (which has no deposit) are incentives that could be implemented by individual businesses in the ACT.

Good Cup is currently utilised by Cafe Stepping Stone in both Strathnairn and Dickson locations. The ACT Government could incentivise adoption of such systems through a grant program focused on building circularity in the hospitality sector over the long term.

At the industry level, an EPR scheme would shift the responsibility for managing end-of-life of products and packaging from jurisdictions to producers, creating incentives for companies to reduce their plastic use and increase reusable or recyclable designs.

## Additional Problematic Items for Phase-Out

### 4. Are there problematic or unnecessary items beyond single-use plastics that you think the ACT should consider for potential phase-out?

Beyond single-use plastics, the ACT should consider the following for phase-out:

- Helium balloons: there is no 'safe' number of balloons that can be released without causing harmful pollution to our waterways and wildlife. Releasing balloons is littering and must be made illegal in the ACT. The *Environment Protection Act 1997*, which currently allows for the release of up to 20 balloons, must be immediately amended to ban the release of balloons, in line with action taken by other jurisdictions such as Queensland, Tasmania, and Victoria.
- Cigarette filters: Cigarette filters are a problematic and avoidable plastic, known to cause harm to the environment, but not provide any benefit to human health. We support the ['No More Butts'](#) campaign, who are calling on the Government to:
  - Formally designate cigarette filters as a problematic and unnecessary plastic and announce a phase out on the sale of filtered cigarettes. During this transition period retailers and distributors would be permitted to sell through existing stock while preparing for compliance.
  - Prohibit the importation, manufacture and sale of filtered cigarettes within the ACT, regardless of the filter material, by 31 December 2027
  - Support the existing call by South Australia to request cigarette filters are added to the agenda of the Environment Ministers Meeting
- Plastic clothing tags
- Single-use ice cream cups
- Vapes
- Single-serve spreads

The Government should also work towards the future ban of potentially harmful chemical additives in packaging, for instance, contamination from PFAS chemicals.

## Complementary Circular Economy Approaches

### Question 5 – What other complementary circular economy approaches should be explored to reduce plastic waste in the ACT?

The ACT Government must actively support the adoption of a national EPR scheme. This will place the onus on producers to be responsible for the packaging they place into the market. It will include mandatory targets to reduce packaging waste and increase recovery.

In addition, the Commonwealth is considering a Circular Economy Act. Effectively designed, this will establish circular economy practice across all products used. We recommend that the ACT supports a circular economy approach to packaging and other products in the marketplace, and works with the Commonwealth on the development of a national Circular Economy Act.

The ACT Government should support a complementary national soft plastics collection service. This must be producer-funded and provide collection at all supermarkets, through kerbside collection and self-haul (where no adequate collection service exists).

**Question 6 – Which of these items do you consider highest priority for the ACT to address?**

- *What type of action would you like to see taken on these items (regulatory bans, non-regulatory measures, or a combination approach)?*
- *Are there other items in addition to those identified in Table 1 that you would like the ACT to address?*
- *Do you foresee any impacts with phasing out/banning any of the items identified?*
- *Do you have any concerns about the availability of suitable alternatives for any of the listed items?*

The Council supports regulatory bans on all 14 items, and considers some items to be the highest priority for the ACT to address where alternatives are readily available and reuse strategies can be implemented promptly..

We recommend that the ACT Government engage with other jurisdictions and similarly sized cities with best practice plastics regulation and reuse systems to anticipate future challenges. For example, South Australia has existing bans on many of the 14 items proposed, including plastic barrier bags, plastic-lined coffee cups, and plastic cold cups. In addition to strong regulation, the South Australian Government’s ‘Replace the Waste’ database provides information to help consumers find reusable alternatives to banned items.<sup>9</sup>

**Regulatory bans – highest priority**

Item	Recommendations
Plastic barrier bags (produce bags)	<p>The banning of produce bags should follow a similar course to the banning of supermarket bags. The replacement should be reusable produce bags, supplied by the store and the individual consumer.</p> <p>During the lead up to the banning of the plastic produce bags, an education campaign should promote the use of reusable bags, and the bags should be readily available in supermarkets.</p>

<sup>9</sup> <https://www.replacethewaste.sa.gov.au/campaign>

	Pre-packaged fruit and vegetables should be packaged in paper or cardboard.
Coffee cups, lids	<p>Plastic coffee cups and lids should not be replaced by compostable cups and lids - this simply replaces one single-use item with another. Single-use coffee cups and lids should be replaced by reusable coffee cups and lids. In addition to regulation, the ACT Government should:</p> <ol style="list-style-type: none"> <li>1. Provide grants or low-interest loans to enable food and drink businesses to implement reusable systems. The major additional costs are a supply of reusable cups and dishwashing facilities.</li> <li>2. Introduce a requirement that reusable cups must be used for “dine-in” consumers.</li> <li>3. Introduce a requirement that reusable cups must be used at events and at major facilities e.g. sports grounds. This should be demonstrated first at events and major facilities owned by the ACT Government. The establishment of a wash trailer would assist with this implementation.</li> <li>4. Introduce a requirement that all food and drink businesses must offer a reusable system to their consumers (including dishwashing facilities)</li> <li>5. Introduce a fee on the use of single-use coffee cups and lids e.g. 50 cents each. This could be achieved by a container deposit scheme system or a fee directly applied to food and drink businesses. This is particularly focused on encouraging individual consumers to make the decision to use the reusable options offered. Once the percentage of single-use cups drops to less than 20% of the total cups used for takeaway drinks, a full ban of single-use cups could be introduced.</li> </ol>
Plastic cold cups	Single-use plastic cold cups should be replaced by reusable cold cups using steps similar to those shown above for plastic coffee cups and lids. This could be

	<p>implemented at the same time as the coffee cups and lids or at a different time.</p> <p>Plastic cold cups frequently come with a paper straw. Reusable cold cups could be designed in a way that does not require a straw and reduces the need for a single-use paper straw.</p>
Plastic bowls with lids	<p>Single-use plastic bowls with lids are replaced by reusable bowls and lids using steps similar to those shown above for plastic coffee cups and lids. Another alternative to plastic bowls is edible bowls.</p>

### Regulatory Bans – medium priority

Medium priority should be assigned to the following items.

Item	Recommendations
Plastic bread bag tags	Replace with paper bread bag tags, which are readily available.
Plastic food sticks	Replace with paper or wooden sticks.
Plastic pizza savers	<p>Encourage no pizza saver.</p> <p>Replace with cardboard or a small ball of dough.</p>
Prepackaged goods with attached plastic items	These are already banned in many States.
Plastic Confetti	Replace with paper or petals/leaves.

### Regulatory Bans – lower priority

Item	Recommendations
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Plastic sauce containers	<p>Noting that the main alternative for these containers are compostable containers, such as the 'Holy Carp!' containers<sup>10</sup>, more work is required nationally to identify an alternative before a ban is immediately implemented.</p> <p>In the meantime, the use of large sauce/soy sauce bottles should be encouraged. The large bottles, being made of plastic of types 1, 2, 3 or 5 or glass can be recycled.</p>
Plastic soy sauce fish containers	As above.
Plastic flower bags	<p>Given the quantity used and the lack of an effective alternative, any action should wait until there is a national alternative solution available. A public education campaign could encourage individuals to take a vase directly to a shop when buying flowers.</p>
Plastic produce stickers	<p>In many cases, there does not appear to be any need for such stickers. For example, all apples are priced the same, and so the sticker is not needed to identify the specific item price.</p>
Plastic cigarette filters	<p>Plastic cigarette filters are one of the most littered items in the ACT. A national approach is needed to identify and implement a suitable alternative.</p>

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[https://heliograf.com/pages/holy-carp?srsltid=AfmBOoo\\_0xUP4rjE9dBGxsTG47KnfzHHtLtUyEOMN7-J6cF8ace0YNb9](https://heliograf.com/pages/holy-carp?srsltid=AfmBOoo_0xUP4rjE9dBGxsTG47KnfzHHtLtUyEOMN7-J6cF8ace0YNb9)