



**Australian
Retailers
Association**

30 April 2020

Single-Use Plastic Consultation
Department of Environment and Science
Office of Resource Recovery
PO Box 2454
BRISBANE QLD 4001

Via email: wastepolicy@des.qld.gov.au

ARA SUBMISSION TO THE QUEENSLAND GOVERNMENT SINGLE USE PLASTIC ITEMS CONSULTATION

The Australian Retailers Association (ARA) welcomes the opportunity to comment on the Queensland Government's Single-Use Plastic Items Consultation (Consultation) dated March 2020.

The ARA represents over 7,500 independent and national members and, since 1903, has been the trusted voice for Australia's \$325 billion retail sector, which employs more than 1.2 million people.

As Australia's leading representative body for the retail industry, we acknowledge the Queensland Government's concern about plastic consumption and pollution and recognise that retailers, like any other business, have an important responsibility to reduce their environmental footprint.

The ARA supports efforts to reduce dependence on single-use plastics and is committed to working with the Queensland Department of Environment and Science (Department) to develop balanced measures which reduce the amount of plastic pollution and deliver them according to agreed timelines. However, the ARA believes that an extended timeline should be considered to enable the retail sector to achieve the intent of the proposed legislation.

As you are aware, the coronavirus pandemic (COVID-19) has severely impacted many aspects of the retail sector. Some of our retail members have experienced significant operational disruption, while others have had to temporarily close as a result of the social distancing and travel restrictions. Due to the level of business disruption, uncertainty and cost pressures caused by COVID-19, the ARA recommends that the commencement date of any measures to reduce dependence on single-use plastics be delayed until the

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impact of COVID-19 on households and businesses subsidies. Targeting a longer implementation timeframe will ensure retailers have enough time to adjust their supply chain and source alternative products that are fit-for-purpose, affordable and safe.

In addition, the ARA strongly encourages the Queensland Government to adopt a coordinated and consistent approach with other state and territory governments across Australia to reduce dependence on single-use plastics. Harmonisation with other states and territories will make it easier for businesses to comply with any new measures and ensure that retailers who operate in Queensland are not subject to a competitive disadvantage in comparison to other interstate retailers. Greater national consistency will also minimise costs associated with transitioning to alternative materials and therefore, reduce the flow on cost impact to consumers.

Finally, it is important that any measures to reduce reliance on single-use plastics be accompanied by an effective public education campaign for industry, business and the community. As a minimum, the education campaign should provide information on what affordable and viable alternatives to single-use plastic can be used by businesses and where these can be sourced. The ARA welcomes the opportunity to engage with the Department on how the ARA can support any future awareness-raising initiatives to facilitate retail acceptance and compliance.

The ARA looks forward to ongoing collaboration with the Department on its *Tackling Plastic Waste - the Plastic Pollution Reduction Plan* to successfully reduce plastic waste from supply chains within a reasonable timeframe. If you have any questions regarding the ARA submission, please do not hesitate to contact me directly.

Yours sincerely,

Paul Zahra
Chief Executive Officer
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