



Our ref: R90/0568 Out-14373
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To all Mayors (individually addressed)

Dear

We are aware that councils may be approached by the Packaging Stewardship Forum (PSF), an industry funded body which has emerged from an amalgamation of the previous Beverage Industry Environment Council (BIEC) and the Australian Food and Grocery Council (AFGC). Councils may be approached with an offer of funding to conduct public place recycling trials.

The background to these proposals is that the packaging industry, as members of the National Packaging Covenant, are required to meet targets for reduction in packaging waste during the second term of the National Packaging Covenant (2005-2010), and need to show substantial progress towards these targets by the Covenant mid-term review (end 2008).

State Ministers have pointed out to the Packaging Industry that a substantial proportion of packaging waste (perhaps 50% or more) is generated outside the residential home, and that this significant sector needs to be addressed. State Ministers have also stated that if the mid term Covenant review (end 2008) does not reveal significant progress towards waste reduction targets for plastic, glass, aluminium and paper, they will consider other regulatory options such as producer take-back and container deposit legislation.

In this scenario, industry is keen to seek ways that away from home packaging can be removed from the waste stream, and this underpins their offer of assistance to councils to establish public place recycling.

The Associations advise councils to take a cautionary approach if they are considering entering an agreement with the Product Stewardship Forum. Specifically:

1. Public place recycling trials need to be fully monitored and evaluated to ascertain levels of contamination. Results should be made publicly available.
2. The public may develop an expectation that following the trial, council will continue to offer the service at its own cost, and council needs to manage this expectation, informed by the evaluation of the trial.
3. Council should make it clear to the PSF and the community that it is under no obligation to continue the service when the trial ends.
4. If the monitoring and evaluation of the trial indicates that the service will deliver an acceptable level of diversion with minimal contamination for a reasonable cost, then it may be worth continuing. If, however, the service does not deliver acceptable outcomes for an acceptable cost, then its worth must be questioned.



There are particular issues regarding away from home recycling for councils with a high level of visitation, through travel or tourism, where council may be dealing with substantial volumes of packaging that are not generated in their own communities.

In general terms, the Associations are concerned at any attempts by industry to establish systems and provide seed funding, and then walk away from that commitment when the trial is over, leaving council to fulfill the community's expectation of continuation. The Associations believe that the financial responsibility for end of life packaging firmly rests, and should remain, with the industry that derives profits from the use of that packaging. To this end the Associations remain committed to proven systems of extended producer responsibility such as container deposit legislation, which very effectively deals with away from home packaging.

Consequently caution is strongly advised if councils are considering accepting industry funding for temporary away from home recycling trials.

Please do not hesitate to contact either of us if you wish to discuss this matter further.

Yours sincerely

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President
Local Government Association

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