



**LEGISLATIVE ASSEMBLY**  
FOR THE AUSTRALIAN CAPITAL TERRITORY

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STANDING COMMITTEE ON ENVIRONMENT, CLIMATE CHANGE AND BIODIVERSITY  
Dr Marisa Paterson MLA (Chair), Ms Jo Clay MLA (Deputy Chair), Mr Ed Cocks MLA

## Submission Cover Sheet

Inquiry into the waste management of absorbent hygiene products

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**THE LEGISLATIVE ASSEMBLY FOR  
THE AUSTRALIAN CAPITAL TERRITORY**

**Government Submission to Standing Committee on Environment, Climate Change and  
Biodiversity - Inquiry into the waste management of absorbent hygiene products**



**Chris Steel MLA**

Minister for Transport and City Services

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Member for Murrumbidgee

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Standing Committee on Environment, Climate Change and Biodiversity

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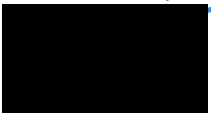
Dear Chair

**INQUIRY INTO THE WASTE MANAGEMENT OF ABSORBENT HYGIENE PRODUCTS**

Thank you for the opportunity to make a submission to the Standing Committee on Environment, Climate Change and Biodiversity Inquiry into the Waste Management of Absorbent Hygiene Products.

I would be happy to meet with the Committee to answer any subsequent questions they may have.

Yours sincerely



Chris Steel MLA

Minister for Transport and City Services

30 September 2022

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Standing Committee on Environment, Climate Change and  
Biodiversity – Inquiry into the waste management of absorbent  
hygiene products

ACT Government Submission

September 2022

## Introduction

The ACT Government welcomes the opportunity to contribute to the inquiry into the waste management of absorbent hygiene products by the Standing Committee on Environment, Climate Change and Biodiversity (the Committee). The inquiry will provide valuable insights into the current state of play for the waste management of these products as well as industry and community expectations for government on this important issue.

This submission provides the Committee with an overview of how the ACT Government currently manages waste from absorbent hygiene products, including nappies, menstrual products and continence aids, and the support government provides to the community to make informed choices about these products. The ACT Government aims to support an informed discussion and encourage Canberrans through education to consider reusable alternatives where possible, in line with the principles of circular economy.

A circular economy aims to stop waste being produced in the first place and replace the dominant 'take-make-dispose' system (linear economy model) with one that is resource efficient and regenerative; and is based on three key principles:

1. Design out waste and pollution
2. Keep products and materials in use
3. Avoid negative impacts to the environment and regenerate natural systems.

The circular economy model promotes higher order actions to rethink the use of raw materials in the first place and keep valuable materials cycling through the economy for as long as possible.

The ACT Government is committed to strengthening Canberra's circular economy by delivering a range of waste management and resource recovery projects, including the creation of circular economy legislation, as outlined in the ACT Government's Parliamentary and Governing Agreement for the 10th Legislative Assembly.

This includes introducing a Food Organics and Garden Organics (FOGO) Collection Pilot to approximately 5,000 ACT households in the suburbs of Belconnen, Bruce, Cook and Macquarie, investigating FOGO collection for a variety of housing types. To support the rollout of the planned citywide FOGO household collection service in Canberra, the ACT Government is investing in a large-scale FOGO facility to process local waste. The government will release a tender for the new facility later this year.

To power the ACT's circular economy, we need cutting edge waste management and recycling facilities. That is why the Australian and ACT governments have co-invested \$23 million through the Australian Government's Recycling Modernisation Fund to build a new Materials Recycling Facility (MRF) adjacent to the ACT's existing one. The new modern MRF will ensure the ACT has state of the art recycling infrastructure as our region grows.

Overall, the ACT Government supports the use of more sustainable alternatives to reduce the volume of disposable products entering our waste systems, as part of growing the circular economy. We also recognise that the use of absorbent hygiene products is a personal decision that individuals

will arrive at. These decisions can involve consideration of a range of factors including hygiene, convenience, price, availability, self-sufficiency and dignity. Each of these factors presents a unique challenge which consumers need to be aware of when deciding which product they use.

The ACT Government is also aware of the importance of improving access to absorbent hygiene products. This is recognised, for example, through the development of *the Period and Products (Access) Bill 2022* which aims to ensure that people can access sanitary products, menstrual hygiene education, toilets, hand washing facilities and sanitary waste facilities.

The structure of this submission is guided by the [terms of reference](#) for the inquiry, with a response provided for each component.

a. [the environmental impacts of absorbent hygiene products across their entire life cycle including single use and reusable nappy types, and to compare these with each other;](#)

The ACT Government's [Recyclopaedia](#), an online guide to recycling, reuse and disposal, contains entries and factsheets on absorbent hygiene products. This online resource provides clear information about the problem of disposable items entering landfill, the alternatives to disposable products and issues for consumers to consider when making decisions about hygiene products. The Recyclopaedia offers simple tips and swaps to reduce waste.

All hygiene products have an impact on our environment, and this varies depending on the type of product, how they are packaged, washed, dried and disposed of. Single-use products are usually made from cotton, synthetics and plastic. They can take hundreds of years to breakdown and can only be disposed of in landfill where they break down slowly, emitting methane, a harmful greenhouse gas.

Swapping to more sustainable options has been made easier by the growing range of readily available reusable products, many with convenient cleaning methods, absorbent liners and a variety of designs. More details on these are below.

#### Compostable alternatives

Compostable products present an opportunity to reduce impacts on the environment as they are made from natural materials rather than synthetic materials. However, compostable products must be placed in a commercial composting facility to achieve the desired output of compost. They cannot be safely composted in home composting systems. Currently, there are no large-scale commercial composting facilities in Canberra that can process compostable hygiene products, so they must be disposed of in landfill like conventional disposable products. While they may break down faster and with less plastic residues than a conventional disposable product, they will still produce methane as they break down in landfill. Ultimately, compostable alternatives are also single-use products and in keeping with the principles of a circular economy, reusable products are preferred over compostable options.

#### Reusable alternatives

With increasing awareness around the environmental impacts of disposable items and improvements in technology, a growing range of reusable products gives consumers more choice.

Reusable options can be more environmentally friendly as they can be reused over many years, reducing greenhouse gas emissions and waste to landfill.

Reusable alternatives for each hygiene products are widely available:

- Nappies: modern cloth nappies
- Menstrual products: menstrual cups, reusable pads and period underwear
- Continence aids: pads, pants, reusable chair, couch and bedding covers.

#### b. the quantity of absorbent hygiene product waste produced, including the methane gas emissions generated by this waste in landfill;

Disposable nappies, incontinence and sanitary products are complex composites of a range of materials, including synthetic polymers, wood fibre, elastic, adhesives and inks. These products contribute greenhouse gases from their decomposition in landfill. These emissions are exacerbated because disposable nappies are often thrown out with faecal matter attached, which should in fact be separated and flushed down the toilet for sewerage treatment.

Waste audits are currently being undertaken to build our understanding of the composition of waste streams in the ACT, including nappies and hygiene products as a single category. An audit undertaken in 2014 showed that in the ACT, nappies which are one of the main absorbent hygiene products, make up 6.1% of the household waste stream<sup>1</sup>. The quantity of waste from nappies was higher in single-unit dwellings than multi-unit dwellings.

For the 2021-22 financial year, approximately 84,500 tonnes of household waste was collected. Applying the 6.1% proportion of nappy waste to overall household waste from the 2014 audits to the 2021-22 total household waste volume, it is estimated that approximately 5,160 tonnes of nappy waste would be sent to landfill for this period. According to the National Greenhouse Accounts Factors 2021<sup>2</sup> for every tonne of waste from nappies disposed to landfill, 2 tonnes of carbon dioxide equivalent (CO<sub>2</sub>e) emissions are generated. This method can be used to produce an estimate of lifetime emissions from waste degradation in a landfill, noting that emissions will occur over a period of decades. Based on the conversion factor, the waste from nappies in 2021-22 alone has the potential to generate approximately 10,300 tonnes of lifetime emissions.

However, it is worth noting that landfill gas capture and electricity generation continue as best practice management of the ACT's landfills. In 2021-22, 31,284 megawatts were produced from biogas captured from the Mugga Lane landfill, enough to power 4,734 households for one year<sup>3</sup>.

#### c. the costs associated with managing waste generated by absorbent hygiene products;

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<sup>1</sup> [https://www.cityservices.act.gov.au/\\_data/assets/pdf\\_file/0018/1131840/2014-ACTNoWaste-domestic-waste-audit-report-FINAL-v2.pdf](https://www.cityservices.act.gov.au/_data/assets/pdf_file/0018/1131840/2014-ACTNoWaste-domestic-waste-audit-report-FINAL-v2.pdf)

<sup>2</sup> <https://www.industry.gov.au/sites/default/files/August%202021/document/national-greenhouse-accounts-factors-2021.pdf>

<sup>3</sup> Based on an average household consumption of 7,200 kW per annum

No calculations or modelling has been carried out to specifically model the costs associated with managing this waste stream.

d. usage of absorbent hygiene products by the community and care sectors, including but not limited to, aged care, disability care, and early childhood settings;

### Period Products

The outcomes from the inquiry are likely to impact on many women and people who menstruate. Consideration could be given to consulting with community groups and members most likely to be impacted by the inquiry.

Financial implications for disadvantaged and vulnerable members of the community should be central to inquiry outcomes. Women and people who menstruate are already financially impacted by the high costs of sanitary products. Any changes should not increase this disadvantage.

In August 2021, the women's charity, Share the Dignity, conducted a survey of 125,000 Australians. One in five respondents reported having to improvise on period products due to cost.<sup>4</sup>

While supporting the reduction of waste, it is essential that women, girls and people who menstruate are supported to access disposable period items when they choose. As well as preference, there are many reasons that disposable period items may be necessary.

The safe reuse of period products requires access to adequate and sanitary bathroom and laundry facilities. Vulnerable people – such as disabled, elderly or homeless people – who menstruate may not have access to these facilities. In these circumstances, single-use period products may be more appropriate.

Other examples where disposable products may be necessary include young girls that are navigating changes during puberty and might be more comfortable using disposable items; people facing homelessness that may not have the ability to wash the reusable products; or for people with disability or severe health issues.

### Nappies

Financially, the initial outlay associated with purchasing both new and second hand cloth nappies can be a barrier to their use. It is not uncommon for them to cost up to \$35 for a single good quality nappy. This cost may be particularly prohibitive for women and parents under financial stress.

As with period items, it is vital that people are supported to access disposable options. Some examples of when this may be important is when the parent of a baby or young child is struggling with their mental health and feels unable to undertake the extra work associated with reusable nappies, or for families with multiple births. With women taking on most of the caring responsibility

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<sup>4</sup> 1 In 5 Australians Forced To 'Improvise' On Period Products  
(<https://www.sharethedignity.org.au/blog/period-pride-report-bloody-big-survey-findings>)



for babies and young children<sup>5</sup>, they are disproportionately responsible for household work and household spending, and as a result, the burden of sustainability action in the home. With time recognised as a domain within the ACT Wellbeing Framework, accessing these essential time-saving items could support Canberrans under the unpaid work indicator within the Framework.

### Considerations for People with a Disability

In relation to people with disability, disposable hygiene products can be a critical component of the support and personal care needs. They are also a key enabler for people with disability to access the community and live with dignity.

Disposable hygiene products generate waste. Products such as incontinence pads, catheter bags, and other hygiene products capture urine, faecal matter and blood.

The use of personal hygiene products for people with a disability often requires intimate personal care and assistance provided by family members and support workers. In these circumstances, the changing of personal hygiene products is undertaken quickly, and with a view to ensuring dignity is afforded the person with disability. Often, human waste is not disposed of via the sewerage system but is included with the disposable hygiene product and placed into garbage bins.

Disability care settings, including small group living arrangements, are located in the community, not provided in high density care settings. Therefore, waste disposal is undertaken in line with general community waste disposal.

Personal hygiene products are used at high volume and are bulky when disposed of. Accordingly, large amounts of waste can accumulate in rubbish bins and emit strong odours. Appropriate waste services are essential to collect and remove accumulated personal hygiene products and to ensure that waste does not generate offensive smells, which impact both households and surrounding neighbours.

Issues around the disposal and collection of personal hygiene products are compounded in environments where there are multiple persons with disability residing in the household, such as small group living.

Appropriate waste disposal and collection for people with a disability is important to maintain dignity and reducing stigma toward people with disability. Accumulated waste that is inappropriately stored, such as waste that is overflowing in a bin preventing the bin from closing, can release strong odours and may affect attitudes of residents towards a household.

There are competing policy objectives between the ACT Government's commitment to reducing waste, and the rights and needs of people with disability and their use of disposable personal hygiene products.

Reusable hygiene products can be too difficult to navigate for people with disability. Alternatives to disposable hygiene products may require greater physical dexterity or require increased washing, which may be difficult for some people with disability. Again, the intimacy required for a support

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<sup>5</sup> In the [2021-2022 report](#) of the living well in the ACT region survey, it was reported that women were more likely than average to be doing more volunteering and unpaid work (i.e. caring for young children)

worker or family member to provide personal care for people with disability may preclude the use of these products.

Disposable personal hygiene products are not recyclable and contain plastic and other materials which do not compost or break down. The propensity for these products to contain excrement and other human waste on disposal, even if products were compostable, presents a biohazard risk.

The ACT Government will consider how potential future shifts in the ACT's patterns of waste collection, to align with a new food organics and garden organics household collection service, will be implemented so that it does not adversely impact people with disability who rely on disposable personal hygiene products. Further consultation with the disability community may be required.

[e. the opportunities and challenges to boost absorbent hygiene product waste minimisation through incentive programs and other means in the ACT, including the feasibility of community trials for compostable, reusable and cloth nappies;](#)

The ACT Government continues to encourage the use of more sustainable alternatives to reduce the volume of disposable products entering our waste systems. In line with the principles of the circular economy, the most preferable outcome for absorbent hygiene products is to choose reusable products over single-use products.

As noted earlier in this submission, the Recyclopaedia details the various hygiene product options and provides links to where individuals can learn more about sustainable products. Organisations such as Canberra Cloth Bums and the Canberra Environment Centre also offer information sessions, support and advocacy for reusable cloth nappies.

Cloth nappy services are another waste minimisation option, which are available in the ACT. Nappy services supply and deliver professionally laundered cloth nappies to participating homes, collecting and replacing used ones each week. This type of service can be expensive but may provide Canberrans who are time poor with a convenient and easy reusable solution.

[f. identifying social impacts for carers created by a change to low-waste solutions;](#)

Managing waste is only one of the many challenges associated with absorbent hygiene products. There are social, financial, medical and productivity impacts that contribute to the complexities for absorbent hygiene product users in the community. There are settings where maintaining the dignity of the user and the capacity to manage increased laundering make reusable products challenging.

[g. the opportunities and challenges to encourage compostable absorbent hygiene product research, technology development and industries in the ACT;](#)

The complexity of disposable absorbent hygiene products makes them difficult to reprocess or recycle, and a lack of end markets for outputs has made it difficult for nappy recycling companies to establish themselves.

In an environment of constant disruption and change, our ability to adapt and innovate sets us apart. The ACT Government's economic development priorities, outlined in *CBR Switched On*, state the ACT Government's aim to work with willing partners across the community to ensure Canberra is prepared for new challenges, and able to grasp the opportunities associated with a circular economy in the ACT. In particular, partnerships with the research sector and innovation ecosystem will be essential to drive effective waste management, and the reuse, recycle and manufacture of materials.

h. identifying short and long-term solutions to the recycling and waste management of absorbent hygiene products, including, but not limited to:

- i) single use vs reusable products;
- ii) options for managing waste as part of planning for the citywide FOGO service;
- iii) impediments to waste management innovation; and
- iv) opportunities and challenges in composting options including local processing;

A circular economy aims to keep materials in the economy and decrease the need for new materials. Compostable alternatives to single-use items are not recyclable and are only used once before being composted or disposed of.<sup>6</sup> In addition, research has shown that compostable products provide negligible or no nutrient value to compost. For this reason, reusable products are preferable under the circular economy model.

The ACT Government, in partnership with the Commonwealth Government, are investing in a large-scale FOGO processing facility at the Hume Resource Recovery Estate to support household collection of FOGO materials. The future FOGO processing facility will process FOGO material to create a valuable compost end-product. Finished compost can be sold for gardening and agricultural uses in the ACT and surrounding regions. The parameters for what materials will be allowed in the future FOGO collection service will be determined as part of the upcoming procurement process.

The ACT Government will continue to monitor the approach of other states and territories regarding accepted compostable materials as part of planning for our citywide FOGO household collection service. For example, the New South Wales Environment Protection Authority have recently released a position statement on acceptable inputs to food only (FO) and food and garden organics (FOGO) bins. These include: food and, for FOGO bins, garden organics, compostable plastic kitchen caddy liners that comply with Australian Standards for commercial composting, and fibre-based kitchen caddy liners. This means, that in addition to food and garden organics, NSW FOGO facilities will only accept one type of compostable product (kitchen caddy liners) with all other compostable items not accepted in FOGO bins.

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<sup>6</sup> <https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/household-recycling-overview/fogo-information-for-households>

As outlined in the Assembly Resolution of 5 April 2022, the ACT Government will investigate better environmental options for nappy waste in the ACT as part of the citywide FOGO service and will report back to the Assembly in June 2023 on how this waste stream will be addressed through future household collection services.

[i. the strategies to address limitations to collaboration and innovation between absorbent hygiene product management stakeholders;](#)

The ACT Government is committed to working with industry, business, academia and the broader community to build a circular economy that supports a prosperous and sustainable Canberra. The ACT Government will participate in ongoing dialogue with industry and the broader community about what the future looks like for emerging and problematic waste streams, including absorbent hygiene products.

[j. the effectiveness of policy and regulatory settings of ACT Government to provide an environmentally responsible approach to absorbent hygiene products waste management;](#)

The ACT is home to a pro-active and engaged community who have a good awareness of the impacts their product choices have on waste generation and resource consumption. Our resource recovery rates have consistently sat as some of the highest in the nation.

The way we think about, and manage, waste is changing in the ACT. This will be reflected in the draft ACT Circular Economy Strategy to be released later in 2022. It will build on the intention of *CBR Switched On* for future investments to focus on initiatives that demonstrate a commitment to the circular economy and take advantage of opportunities to attract innovative new enterprises, high-value jobs and support wellbeing.

[k. the availability of educational material highlighting the benefits of using sustainable and environmentally-friendly types of absorbent hygiene products; and](#)

The ACT Government has provided the community with a range of educational material about reusable hygiene products. Some examples are provided below.

The Recycling Discovery Hub has exhibited cloth nappies and reusable personal hygiene products since 2017. In 2020, sustainable sanitary education resource kits were created. These kits showcase a wide range of sustainable samples and information and help educate about re-usable and sustainable hygiene options. They can be borrowed as a resource by schools, community groups and not-for-profits. The kit was also featured at the Zero Waste Festival 2022 as part of the Waste Sorted stall.

The Recyclopaedia provides detailed information about sustainable alternatives for absorbent hygiene products. These include, cloth nappies, compostable and reusable continence aids, menstrual cups, period underwear and reusable sanitary pads. To date, these pages have been visited over 2,000 times.

Following the Assembly Resolution of 31 July 2019 ‘Nappies and Personal Hygiene Products – Sustainable Products’, a number of factsheets were created including a [Nappies and Sustainability Factsheet](#), [Menstrual Products and Sustainability Factsheet](#) and [Continence Aids and Sustainability Factsheet](#). The factsheets can be accessed via the relevant Recyclopaedia entries. The detailed information in these factsheets is designed to support community workshops and be used as a resource by ACT Government directorates engaged in health and education.

The ACT Government is also in conversation with organisations such as Canberra Environment Centre and Sexual Health and Family Planning ACT Inc to engage with the community about alternative products through workshops.

In addition to the programs highlighted above, the Canberra Environment Centre also hosts the Wee Ones Cloth Nappy Display, a freely accessible library for parents who want to look at and feel nappy alternatives before deciding whether to make a purchase. These initiatives are aimed at assisting the community to make informed choices and increase the uptake of reusable alternatives to disposable absorbent hygiene products.

#### [I. any other related matters.](#)

Financial implications for disadvantaged and vulnerable community members should be central to the Inquiry. Women and people who menstruate, and carers/people using nappies are already financially impacted by the cost of sanitary products.

#### [Concluding remarks](#)

The ACT Government welcomes the Committee’s inquiry into this important matter in the ACT and looks forward to the findings of the Inquiry and release of the Committee’s report.