



LEGISLATIVE ASSEMBLY
FOR THE AUSTRALIAN CAPITAL TERRITORY

STANDING COMMITTEE ON ENVIRONMENT, CLIMATE CHANGE AND BIODIVERSITY
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Submission Cover Sheet

Inquiry into the waste management of absorbent hygiene products

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The Committee Secretary
Standing Committee on Environment,
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GPO Box 1020
Canberra City ACT 2601

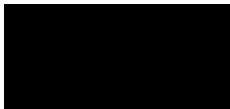
INQUIRY INTO THE WASTE MANAGEMENT OF ABSORBENT HYGIENE PRODUCTS

Conder House has provided a modern cloth nappy service to Canberra Region residents and businesses since 2018. Over the past four years, we have serviced 11 early childhood centres and over 30 families in their homes.

We have obtained suitable industry specific experience implementing a reusable nappy service in early childhood education and care settings to offer considered and informative comments to your inquiry.

Thank you for the opportunity to provide you with our submission. I look forward to the outcomes of your inquiry.

Yours sincerely



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SUBMISSION TO THE INQUIRY INTO THE WASTE MANAGEMENT OF ABSORBENT HYGIENE PRODUCTS

Conder House offers the following in relation to the use of reusable nappies in the Canberra Region:

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 annexure provides a detailed analysis of the impacts of reusable and disposable nappies in Australia. This assessment was written in 2009. It is worth noting that the cotton terry towelling nappies that the assessment was based on are no longer the preferred type of reusable nappy. The most commonly used reusable nappy is referred to in this document as *'elasticated or shaped nappies'*, and therefore the water resource depletion associated with cotton production is reduced.

B. The quantity of absorbent hygiene product waste produced, including the methane gas emissions generated by this waste in landfill.

Conder House does not have sufficient industry knowledge to respond to this item.

C. The costs associated with managing waste generated by absorbent hygiene products.

Conder House does not have sufficient industry knowledge to respond to this item.

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

In order to comply with Quality Management Standards (QMS) for early childhood education and care settings, centres change nappies every two hours. While the number of nappies used per day across the entire centre will vary depending on authorised placements, we have found that most centres are changing each child's nappy four times per day.

In calculating the usage for a centre with 40 placements using disposable nappies, that equates to 160 nappies (8 kgs) per day or 56,640 (2.832t)¹ per year (excluding public holidays) going into landfill.

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.

Conder House has been providing a modern cloth nappy service (referred to as *'elasticated or shaped nappies'* in the annexure) to the Canberra Region since 2018.

In our experience, early childhood education and care centres face several obstacles when implementing a reusable nappy service. The top three obstacles listed below can be overcome through an incentive program:

- **Cost.** The cost of reusable nappies is higher than disposable nappies and includes set up costs. There are several early childhood education and care centres in the Canberra Region that have already switched to reusable nappies, however more would if they could obtain financial assistance to help them with the additional cost

¹ Weight calculations based on moderate impact mass per nappy in annexure paragraph 3.1 table 1

incurred, particularly during the first year of implementation. After commencing the service, centres would then be in a better position to incorporate these costs into their fee structure for subsequent years.

- **Facilities.** Some centres (particularly those in older buildings) lack suitable laundry facilities to enable the management of soiled nappies in accordance with Workplace Health Safety (WHS) and QMS requirements. Funding to upgrade their laundry facilities would set them up to successfully implement reusable nappies into their environmental strategy.
- **Training.** Reusable nappies are not as easy to use as disposable nappies. If incorrectly fitted, they will leak causing parent and Educator frustration. In order to use the reusable nappies correctly, Educators must undertake training to achieve success. As release time to allow Educators to attend such training is costly, financial assistance for training would also incentivise centres.

F. Identifying social impacts for carers created by a change to low-waste solutions.

We understand that some families do not wish to use reusable nappies in their home. Usually, this is due to the additional time required to wash and prepare the nappies, and the increased frequency of nappy changes. Educators in early childhood education and care settings, however, use them as part of their daily duties and are already undertaking two hourly changing cycles in order to comply with QMS. Implementing reusable nappies into early childhood settings ensures incentive programs achieve maximum value for money, without impacting how carers operate in the family home.

G. The opportunities and challenges to encourage compostable absorbent hygiene product research, technology development and industries in the ACT.

Conder House does not have sufficient industry knowledge to respond to this item.

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

- a. **Single use vs reusable products;**
- b. **Options for managing waste as part of planning for the citywide FOGO service;**
- c. **Impediments to waste management innovation; and**
- d. **Opportunities and challenges in composting options including local processing;**

Conder House does not have sufficient industry knowledge to respond to this item.

I. The strategies to address limitations to collaboration and innovation between absorbent hygiene product management stakeholders.

The laundry industry has not been immune from the effects of the pandemic. If regulation of reusable nappies in the ACT was agreed, it would need to be a longer term approach (such as the switch to electric vehicles) to enable the laundry industry to scale-up its operations. Conder House is already transitioning to larger facilities as it has anticipated that there will be increased interest in reusable nappies in the Canberra Region.

In the short term, an incentivisation program for early childhood education and care settings would be a positive initial step, with regulation as a longer term approach.

J. The effectiveness of policy and regulatory settings of ACT Government to provide an environmentally responsible approach to absorbent hygiene products waste management.

We encourage the ACT Government to regulate the use of reusable nappies in early childhood education and care settings. Industry regulations are the norm and this would be perceived as just another regulation on business, rather than the ACT becoming a 'nanny state' by telling residents how to run their families.

If families do not wish to use reusable nappies in their home, they will still be contributing to the reduction of landfill when their child is attending an early childhood education and care setting, and this will have no impact on their family, but the benefits to the reduction of landfill will be enormous.

There was community push back when plastic straws and bags were regulated in the ACT. We anticipate there will also be initial displeasure with the regulation of reusable nappies in early childhood education and care settings, however, the majority of the community will come on board with the decision, just like they have plastic straws and bags.

The ACT Government is known to be future focused and progressive in its environmental policies. The regulation of reusable nappies in early childhood education and care settings would be an effective extension of its current environmental strategy and the only way to truly make a significant positive impact on the number of disposable nappies entering landfill.

K. The availability of educational material highlighting the benefits of using sustainable and environmentally-friendly types of absorbent hygiene products.

The ACT Government has adopted an education approach regarding disposable nappies and offers various resources such as a Recyclopaedia, fact sheets, no waste festivals and an ACT Libraries recycling presentation to early childhood education and care settings on cloth nappies. Disappointingly, Conder House, as the cloth nappy industry leader in the Canberra Region has not been approached to participate or advise on any of the above.

Education is an important process to facilitate change, however it is now time to take action by incentivising early childhood education and care settings in the short term, and regulation of the use of reusable nappies as a long term approach.

L. Any other related matters.

Nil.

Annexure:

- A. Life Cycle Assessment: Reusable and Disposable Nappies in Australia, Kate O'Brien, Rachel Olive, Yu-Chieh Hsu, Luke Morris, Richard Bell and Nick Kendall, University of Queensland, 2009