



LEGISLATIVE ASSEMBLY
FOR THE AUSTRALIAN CAPITAL TERRITORY

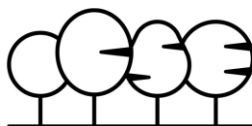
STANDING COMMITTEE ON ENVIRONMENT, CLIMATE CHANGE AND BIODIVERSITY
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Submission Cover Sheet

Inquiry into the waste management of absorbent hygiene products

Submission Number: 10

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Standing Committee on Environment,
Climate Change and Biodiversity
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To whom it may concern

Inquiry into waste management of absorbent hygiene products

The Commissioner for Sustainability and the Environment is an independent statutory position established by the *Commissioner for Sustainability and the Environment Act 1993*. My Office advocates for an environmentally sustainable future for the Territory and supports reforms that work to protect the many values of the ACT's unique environment.

This Inquiry presents a valuable opportunity for the ACT Government to consider options for limiting and managing a rapidly growing waste stream. I address the Inquiry's terms of reference below.

Note: this submission responds only to selected points from the Term of Reference for this Inquiry, so letters appearing next to the headings are not sequential.

a. the environmental impacts of absorbent hygiene products across their entire life cycle including single use and reusable nappy types and compare these with each other;

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

Manufacturing disposable nappies and adult continence aids is water and energy intensive. Most disposable products are made from synthetic fibres derived from crude oil and as such the scope 3¹ greenhouse gas emissions associated with manufacturing, transporting, and disposing of absorbent hygiene products and their contents are significant.

It is estimated that 15 million nappies go to the ACT's landfill each year, where they take hundreds of years to decompose, generating methane as they break down². Comparable statistics do not appear to be available for adult continence aids, although consideration of adult continence aids will be essential to any successful strategy for management of absorbent hygiene product waste in the ACT. Recent research³ found that Australia-wide absorbent hygiene products generated by adults will account for between 4 and 10 times those produced by infants by 2030, due to an aging population. In the Attachment to this submission, I provide a comparative analysis of the general environmental impacts of absorbent hygiene products across their entire life cycle.

¹ Scope 3 emissions refer to the emissions generated through the production of goods and services brought in from outside the ACT. See Office of the Commissioner for Sustainability and the Environment, 2021. Scope 3 Greenhouse Gas Emissions in the ACT. <https://envcomm.act.gov.au/wp-content/uploads/2021/11/Scope-3-Greenhouse-Gas-Emissions-in-the-ACT-FINAL-Report-A30648089.pdf>.

² ACT Government City Services, Nappies and sustainability. <https://www.cityservices.act.gov.au/recyclopaedia/factsheets/nappies-factsheet>.

³ Brewster, Rounsefell, Lin et al, Waste Management Vol 152, 2022. *Adult incontinence products are a larger and faster growing waste issue than disposable infant nappies (diapers) in Australia*. Elsevier Science

Recommendation: The ACT Government should conduct an in-depth analysis of absorbent hygiene product supply chains for the ACT to gain a better understanding of the environmental impacts across their life cycle.

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;

Currently, the ACT Government has no incentive program to help boost absorbent hygiene product waste management. Other jurisdictions, such as the City of Hobart, are successfully running a cloth nappy and reusable sanitary product rebate scheme⁴. As a part of this scheme, eligible City of Hobart residents can apply for a rebate for 50% of the purchase price of either cloth nappies (including swim nappies and modern cloth nappies), or reusable sanitary products (including menstrual cups, cloth pads and period underpants).

In addition to individual consumers, the community and care sectors also generate high quantities of absorbent hygiene product waste. Currently, there are no government-led initiatives supporting the community and care sectors transition away from single-use absorbent hygiene products in the ACT.

Recommendation: The ACT Government should provide financial support for community services such as cloth nappy libraries and provide free or discounted product trial packs through community and medical hubs.

Recommendation: The ACT Government should establish an absorbent hygiene rebate scheme for individuals, drawing on lessons from other jurisdictions such as the City of Hobart

Recommendation: The ACT Government should explore a laundering service subsidy program targeting the community and care sectors. There is an opportunity to partner with local laundry and linen services to provide subsidised cloth nappy and reusable continence aid laundering services. Subsidy programs could also be explored for individual consumers using nappy or continence aid laundering services.

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;

For the majority of reusable absorbent hygiene products, a major barrier to adoption is the up-front purchase cost. While reusable products cost the consumer less over their whole time of use, the initial outlay of several hundred dollars is prohibitive for many. The ACT Government can assist with overcoming this barrier through rebate and subsidy schemes as outlined above in response to part e) of the Terms of Reference for this Inquiry.

⁴ City of Hobart, Nappy and Reusable Sanitary Product Rebate. <https://www.hobartcity.com.au/Residents/Recycling-and-rubbish/Cloth-Nappy-and-Reusable-Sanitary-Product-Rebate>.

In terms of waste management, other jurisdictions such as the Hobart City Council⁵ and Bega Valley Shire⁶ already accept certified compostable nappies in their FOGO processing facilities. Currently, there are no large-scale composting facilities in ACT that can process compostable absorbent hygiene products. They cannot be safely composted in home composting systems, so like conventional disposables must be disposed of in landfill. While they may break down faster and with less plastic residues than a conventional disposable, they will still produce methane as they break down⁷.

Recommendation: The ACT Government should expand the citywide FOGO processing infrastructure to accept certified compostable nappies and continence aids and invest in the technology to facilitate this.

Recommendation: The ACT Government should investigate whether other composting techniques may be viable in the ACT. Given that the risk of bacterial contamination is likely to make compost produced using absorbent hygiene products unsuitable for food and fibre production, this investigation should extend to how this risk can be mitigated through further treatment of the finished product, or through exploring alternative uses for it.

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

The City Services branch of the ACT Government has comprehensive material about sustainable absorbent hygiene products on the Recylopedia website. Additionally, there is a sustainable sanitary education resource kit available on the Recylopedia website which can be borrowed for up to two weeks⁸. However, awareness about the availability of these resources among members of the public appears to be low. Relying on community members to proactively seek out and find the website on their own initiative is not an effective education strategy.

The Canberra Environment Centre has a free modern cloth nappy display⁹ which enables members of the public to have a look at the types of cloth nappies, accessories, inserts and kits before making a purchase. Local environmental organisations such as the Canberra Environment Centre play a key role in providing support and information to those interested in sustainable absorbent hygiene products.

The cultural taboos surrounding menstruation and incontinence in society are a factor which limits the spread of information about waste minimisation in relation to absorbent hygiene products. This is likely to especially be the case for some migrant and minority communities. Opening dialogues about these issues will help break down stigmas and demystify reusable absorbent hygiene products, which in turn will help increase waste management innovation.

Recommendation: The ACT Government should promote their Recylopedia resources more widely to maximise uptake of sustainable absorbent hygiene products, for example through articles in community newsletters, at fairs and events, and through workshops.

⁵ City of Hobart, FOGO and compost. <https://www.hobartcity.com.au/Residents/Recycling-and-rubbish/FOGO-and-compost>.

⁶ ABC News, 2022. NSW's Bega Valley compostable nappy trial success garners global attention. <https://www.abc.net.au/news/2022-04-09/bega-valley-compostable-nappy-trial-nsw-far-south-coast-success/100935440>.

⁷ ACT Government City Services, Nappies and sustainability. <https://www.cityservices.act.gov.au/recyclopaedia/factsheets/nappies-factsheet>.

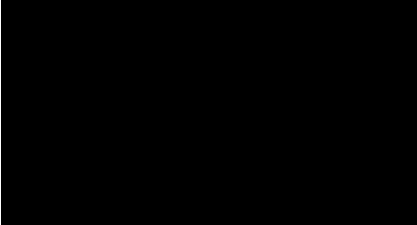
⁸ ACT Government City Services, Borrow a resource kit. <https://www.cityservices.act.gov.au/recyclopaedia/factsheets/borrow-our-resource-kit>.

⁹ Canberra Environment Centre, Modern Cloth Nappy Display. <https://www.canberraenvironment.org/wee-ones-modern-cloth-nappy-display>.

Recommendation: The ACT Government should facilitate and fund free educational campaigns and workshops in collaboration with community organisations on topics such as menstruation and incontinence. These programs should be culturally and linguistically appropriate, targeting sectors of the community who may have limited exposure to this topic.

Thank you for your consideration and please do not hesitate to contact me if you have any further queries.

Yours sincerely



Dr Sophie Lewis
Commissioner for Sustainability
and the Environment

24 October 2022

Attach 1