



**LEGISLATIVE ASSEMBLY**  
FOR THE AUSTRALIAN CAPITAL TERRITORY

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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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# Inquiry into the Waste Management of Absorbent Hygiene Products

We appreciate the opportunity to provide a submission to the Select Committee Environment, Climate Change and Biodiversity in respect of the Inquiry into the Waste Management of Absorbent Hygiene Products, which we whole-heartedly welcome. We thank the Committee for their consideration of our submission and for their important work in this area.

## Introduction

Consideration of waste management on absorbent hygiene products is closely connected to people's conditioning and learned disgust towards their bodily functions. It is important that the government play a key role in shifting this response for the benefit of those managing their periods, incontinence and their children's transition to toileting whilst mitigating the harmful environmental impacts. Given the ACT's position on single use plastic items, period products, single use incontinence pads and pants, single use nappies, also fit within the single use plastic items that we want to be rapidly shifting away from. For periods, we need to consider reusable pads as an alternative to the single use sanitary pad; for incontinence we need to look at reusable and washable incontinence pants, bed sheets/pads and for babies and children, modern cloth nappies needs to become the default.

## Who We Are

We represent a number of grassroots organisations that provide period products to those experiencing financial difficulty including through community pantries, including at the Ainslie Community Pantry and specialise in Zero Waste in the school environment (Paula McIntosh).

## Normalising and Transitioning to Sustainable Period & Absorbent Hygiene Products

The Period Poverty & Facilities Access Bill offers a great opportunity to prioritise and normalise the use of sustainable period products and to switch the default from single-use, disposable items to sustainable, reusable products. Reusable items can be more empowering for those using them, and are definitely more cost effective in the medium and long-term, as well as being better environmentally. This aligns strongly with the ACT government's progressive leadership on waste reduction and sustainability.

In the examples of period products in the Bill, we want to see it include reusable pads explicitly above 'sanitary pads', which is often associated with disposable, single use items.

At the Ainslie Community Pantry we are very grateful to receive donations of period products from Share the Dignity and from community members. We receive regular donations of tampons and sanitary pads and have also asked specifically for sustainable period products, as we know that these are very popular with those accessing the Pantry. They are picked up immediately whereas there are usually always tampons available.

We have not had our recent requests for sustainable items met either by Share the Dignity or the community – we know that this is most likely connected to the higher cost of the products and also the stigma that is still associated with reusable items from purchasers. We would love to see significant

funding allocated to sustainable items in the initiative and programs accompanying the Bill, to help overcome cost barriers and to increase the normalisation of their use.

## Period and Incontinence Pants

Period pants come in different thicknesses for flow and for overnight protection. When used with a menstrual cup on heavy days, a lighter flow pant can be used alongside it. There are also maternity pants for post-partum bleeding.

We also know that ModiBodi makes pants for light bladder leakage in briefs, boxer-style and trunks for all genders.

All pants can be easily cared for by rinsing and washing; access to laundry facilities are all that is needed and line drying. This means reusable pants are a good option for bladder incontinence too.

Pants will last effectively for years and ModiBodi now offers recycling for pants at their end of use, with new recycled pants also a purchasing option. As an incentive, until October 2022 people returning their clean and dry pants get \$10 towards a new pair: <https://www.modibodi.com/pages/recycled-pairs-project>

## Nappies

Canberra Cloth Bums is a great Facebook page for education and for members of the community passing on their modern cloth nappies that are no longer needed. These can be gifted through this site or on other groups, like Buy Nothing groups - this extends the use of reusable nappies beyond a families children to other members of the community.

Faeces can often be easily removed from modern cloth nappies either using liners or by removing directly into the toilet and using the flush if necessary and washing at a high temperature to kill bacteria. Line drying in the sun is also great for stain removal.

## Importance of Education

### Reusable Period Products

We need to overcome societal stigma about periods and incontinence in general and sustainable products in particular; distributing free reusable period items would help overcome stigma, barriers to using sustainable items and address period product waste.

We are sure that the committee is already aware that the NSW Government is considering issuing period pants to students at public schools; this is fantastic in terms of sustainability and long-term investment by governments. To have this recommendation from this Committee Inquiry and the Committee Inquiry into the Period Poverty & Facilities Access Bill would be so fundamental in shifting the culture on sustainable period products and a fantastic opportunity for schools to break down the stigma and taboo around openness to discussing periods.

A great initiative in Canvey Island in the UK is now offering free sustainable period products at Foodbanks; alongside training and education on how to use and care for sustainable items: <https://www.essex.gov.uk/news/canvey-island-joins-sustainable-period-movement>.

Access to menstrual cups for university students, extended to college and high schools would also be a game-changer, free menstrual cups have been issued for free in several US universities: <https://sustain.princeton.edu/news/2021/free-menstrual-cup-giveaway> as a sustainability measure.

It would be fantastic to see similar world-leading programs in the ACT and to see free period pants offered to school-aged children through the uniform shop and free menstrual cups at college and university level.

We need a strong emphasis on sustainable period products, similar to the UK and US, to see a shift in culture. Along with this shift we can encourage the conversations around periods, shame and stigma by educating all students, of all genders, about period products, especially re-usable ones, to demystify them and to overcome taboos that are still prevalent around periods.

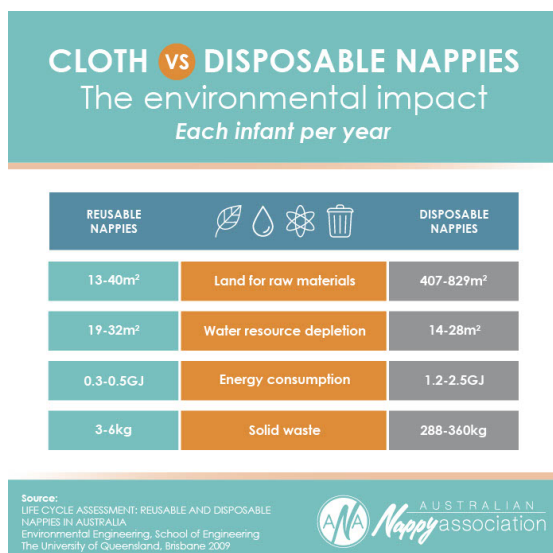
## Reusable Nappies

5.6 million disposable nappies are thrown away every day in Australia; that's 2 billion every year, with disposable nappies comprising 4% of household waste.<sup>1</sup>

According to a lifecycle study by the University of Queensland, in a single year disposable nappies manufactured for just one baby will use:

- 20-50 times as much land for raw material
- use 4-8 times as much energy
- use about the same amount of water
- and create over 300kg more landfill

than if that same baby was in cloth nappies, even if you include not only the growing of crops for fabric and manufacture of nappies, but the washing of them for that year as well.<sup>2</sup>



<sup>1</sup> <http://www.abc.net.au/news/2015-05-22/dirty-nappies-a-major-contributor-to-waste-in-act/6489538>

<sup>2</sup> <https://www.austliannappyassociation.org.au/are-cloth-nappies-as-bad-for-the-environment-as-disposable-nappies/>

Disposable nappies take 300-500 years to decompose in landfill. Using modern cloth nappies, it is possible to divert approximately 5,500 disposable nappies entering landfill per child. Even if parents use Modern Cloth Nappies or Terry Nappies part-time (meaning not used when out of the house or not used at night time) it will make a significant reduction in waste to landfill.

According to CHOICE Magazine, parents using single use nappies will spend from \$1,700 to \$3,000 per child on disposable nappies depending on when their child toilet trains and which brand of nappy they use.

Parents using cloth nappies will usually spend \$250-\$1,000 on cloth nappies (though it can be less if they use terry squares, or buy second-hand nappies, or use the same nappies on more than one child) and will usually spend around \$100-\$200 a year on water, electricity and detergent washing them.<sup>3</sup>

In terms of modern cloth nappies, having nappy libraries to help with support and advice and finding brands that work for each child are a great option. Overcoming the 'extra' work in using them, particularly when out of the home; is important too; it becomes a simple process fairly quickly. Education and promotion is important when ease, price and convenience are often presented as barriers to using modern cloth nappies. When parents are time poor, tired and financially stretched it seems a hurdle too great.

The following options would encourage the use of reusable nappies:

1. Include up-to-date information about modern cloth nappies in prenatal classes and new parent groups run by maternal child health nurses and in cloth nappy workshops run by ACT government

The City of Wollongong estimates it's saved 700,000 disposable nappies through its workshops: Over 300 families attended cloth nappy workshops as part of the pre-natal classes at Wollongong Hospital and in baby health clinics. Before the cloth nappy workshop, 58% of attendees said they might/would use cloth, and 40% said they would not use cloth nappies. After the workshop, 96% of attendees said they might/would use cloth, and only 2% said they would not use cloth nappies.<sup>4</sup>

The Australian Nappy Association (ANA) has kits designed for midwives and MCHNs that include samples of nappies and an instruction video that can be used in a presentation:

<https://www.australiannappyassociation.org.au/product/get-into-cloth-kit-industry-professionals/>

2. Display information about reusable nappies in maternity hospitals and baby clinics and have information brochures readily available. Even a public campaign to encourage the use of reusable nappies.
3. Offer a subsidy or rebate like several other councils to encourage and support those parents who have made the choice to use reusable nappies. There is a higher upfront cost for cloth nappies, since parents have to purchase all the nappies at the start (the cost of buying 6,000 disposable nappies up front would be significant) so that can be a barrier for some parents to making the switch. A subsidy or rebate may make the difference.

You can find a list of the councils that are currently offering reusable nappy programs here: <https://www.australiannappyassociation.org.au/cloth-nappy-services-from-councils-across-australia-2021/>

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<sup>3</sup> <https://www.australiannappyassociation.org.au/wp-content/uploads/2019/05/2019-Cloth-Nappy-Survey-Results.pdf>

<sup>4</sup> <https://www.australiannappyassociation.org.au/how-a-council-saved-700000-disposable-nappies-from-landfill/>

The ACT providing accurate information and encouraging reusable nappies usage will make a positive impact on the community and help Canberra to meet its waste management and sustainability goals.

The Nappy Association has provided a myth-busting factsheet addressing the typical barriers raised in response to using Modern Cloth Nappies.

**But I won't have time!**  
It only takes 10 minutes a day more to use cloth nappies instead of disposables.

Disposables are convenient. But you still have to drive to the shops, load your trolley and car (baby in tow), unload your car AND empty the rubbish bin daily. Cloth is as simple as flush, rinse, wash, dry and REUSE!

**Disposables are only approx. 35c each**  
True! But you need to buy 6,000 of them! You only need to buy 24 cloth nappies for the same number of nappy changes.

24 cloth nappies x \$30 each = \$720\*\*  
6,000 disposables x \$0.35 each = \$2,100

**How much will it cost when I add the detergent, water and electricity?**  
Surprisingly, it only costs about \$200 to wash cloth nappies for two years\*

\*Depending on your machine. This does not include wear and tear

*\*\*According to the 2019 Great Australian Cloth Nappy Survey most cloth parents spend \$250 - \$1,000 on their cloth nappy stash*

Conder House offers a solar-powered nappy laundry service, Canberra-wide, and use linen bags to avoid plastic bags: <https://conderhouse.com.au/services/nappy-service/>. They report the following data on the number of nappies saved from landfill by using Modern Cloth Nappies:

**Nappies Saved From Landfill: 215058, Tonnes Saved From Landfill: 10.752.**

Conder House also works with Early Learning Centres around Canberra and has found that families have been reassured that the company washes to hospital-grade standards, which addresses concerns with hygiene.

### **Compostable nappies**

Compostable nappies and liners are often not easily compostable in home composts and often need industrial composting – this is often not made clear on the packaging. Signposting clearly to the correct disposal for composting will be critical to uptake and success. Overcoming the difficulty in storing and managing large compostable waste will also be a possible barrier and disincentive for parents. Encouragement to use alongside Modern Cloth Nappies would be preferable over exclusive use, but is far better than single disposable nappies.

The ANA are happy to work with any council who is interested in setting up something for their communities and can be contacted at [media@australiannappyassociation.org.au](mailto:media@australiannappyassociation.org.au). Community is one of the most important factors when it comes to a family deciding to use and successfully using cloth nappies. Knowing someone else in real life - a friend or family member especially - is the number one indicator that someone will consider using cloth nappies.

## Learning from the Victorian Experience – Period Products

Paula McIntosh, who runs the Zero Waste Schools Australia (InstagramAccount @zerowasteschoolsaustralia) started a GetUp! petition in response to the announcement from Premier Daniel Andrews on accessing free pads and tampons at school: <https://me.getup.org.au/petitions/eco-friendly-periods-4-vic-schools-3>. \$21 million was spent on period products over three years which would have gone a significant way to covering the cost of sustainable items that would last longer and not require regular access. We have strongly urged against the government solely subsidising or even significantly investing in single-use items for free access. Single use items can still be made available for those that choose to have those items, but the government should be minimising the waste to landfill for period items, which is significant. Government funding should be prioritised on reusable, sustainable items. We also would caution strongly against putting items in vending machines, which require on-going maintenance, are an unnecessary expense and gate-keeps access.

### Costings for the provision of reusable menstrual products in Victorian Schools

In 2020 Premier Daniel Andrews has announced that Victorian School Students will be able to access free pads and tampons from school. The \$21 million initiative commenced in Term 3, 2019 and installed dispensing machines in every Victorian school. The two main aims of this initiative were to alleviate period poverty and ease the cost of living on Victorian families. This initiative will continue until June 2023.

Let's consider the sums.

Presently there are 250,460 students in Victorian Secondary Schools; let's say 51% are menstruating. There are 127,000 students in the Government secondary, 7,000 students in Special schools, and 800 students in Language Schools. The approximate number of students who menstruate in Victorian Schools is 134, 718.

If we divide  $134,718 \div \$21,000,000 = \underline{\$155 \text{ per student}}$

1 pair of period undies **retails** for around \$25, that's enough for 6 pairs per student and period undies last longer than 3 years. The argument then is ACT taxpayers will get more value for their money if reusable period products were provided in schools over single use period products.

The average woman has 456 periods in a lifetime. Source [www.cityservices.act.gov.au/recyclopaedia/factsheets/menstrual-products1f](http://www.cityservices.act.gov.au/recyclopaedia/factsheets/menstrual-products1f).

If we work on the proviso that she menstruates for 5 days and over those 5 days she uses 10 pads and 20 tampons per cycle, based on the numbers in the table, that's a cost over a lifetime of \$6,384.

	Av. unit cost	No. of uses	Cost per use
Tampon	.50c	1	.50c
Disposable pad	.40c	1	.40c
Reusable pad	\$23	100	.23c
Menstrual cup	\$40	432	.09c
Period underwear	\$24	180	.13c

Data from by ACT NoWaste from a range of online sources and retailers.

One menstrual cup can last 10 years and period underwear, if well looked after, will last up to 5 years. Over the course of menstruation throughout the life span, a menstruating person would need 3 menstrual cups = \$120 AND 10 pairs of period undies = Totaling \$240 for a lifetime.

Total lifetime cost of reusables = \$240

Total lifetime cost of single use = \$6, 384

Difference = \$6, 144

Imagine if menstruating people invested that \$6,144 over 38 years? That money invested in the stock market could be worth in excess of \$100,000.

How could it happen? *Add period undies to the uniform list!*

In 2021 Melbourne Girls' College partnered with the period underwear brand ModiBodi, to run a pilot project with the aim of showing the Victorian Government that their aims of alleviating period poverty and easing the cost of living on Victorian families, could be achieved in a sustainable way. 60 students volunteered to be part of the pilot project. Students were surveyed pre and post use of the period undies. Here is a sample of post use survey questions and responses.

Q 7. *Did using period underwear improve your day/s in any way? If yes, can you please tell us how?*

### Student responses

*Yes they did improve my day, I was able to not worry about going to the bathroom to change pads, and it was also nice to just know I wouldn't have to go out and buy products because I already had them at home. It also just made me feel a lot more comfortable in school, not worrying about a pad fitting awkwardly or needing to change it.*

*not having to worry about stock up products incase pads run out, also I basically forgot I had my period most of the time, as I didn't have to worry about changing pads or tampons. The underwear were extremely comfortable, just like an ordinary pair.*

*Absolutely it improved my days. I was much less stressed about having to change pads or tampons, could spend more time with my friends, there was so much less to think about*

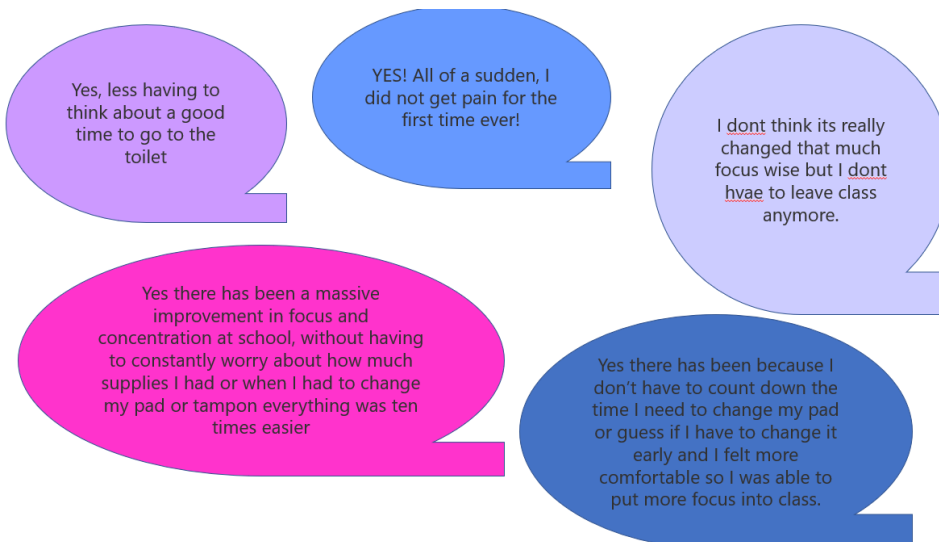
*I didn't have to worry about taking to long in the bathroom during class and could spend more time outside at recess.*





Q9. Has there been a noticeable change or improvement in your ability to focus and concentrate while at school, since you've been using period underwear to manage your period? Please tell us.

### Student responses



### Offering Genuine Choice

Cost prohibits personal use and regular supply to the pantries and even requests made to Share the Dignity for cups, period pants and reusable pads; supply does not match need, and sustainable products are not often donated. The government could help provide the opportunity to offer genuine choice by making sustainable items available for free.

We hear that sustainable items are often considered to not be 'appropriate' for homeless women, given concerns over access to sterilisation. This is an access to sterilisation issue that needs to be addressed. There are cup sterilisers that could be made available in community services and other approved suitable places. Setting up arrangements for laundry services for reusable items is also an option.

Given menstrual cups can be used for 8-12 hours, these could be a better option for homeless women than needing to find a way to change more frequently if using single, disposable items. To ensure that there is choice for everyone to manage their periods with the items they choose, this is an important consideration to resolve.

It is essential that there is training, education and awareness-raising around the sustainable items in how to choose, how to use, and how to care for them. Most period pads and reusable pads can be rinsed and washed with other clothing items. Menstrual cups can be washed with soap and water and sterilised between periods. Access to laundry facilities and sterilisation; there are sterilisation machines for cups if the option to stove-top boil for 10 minutes is not possible.

We are aware that evidence was provided at the Period Poverty Select Committee Hearing that items were provided through vending machines because people were accessing products and returning items to the shop to exchange for food. To us, this suggests that period poverty is one facet of poverty and we should not be removing people's access to food, but signposting them to services that can assist them **and** providing them with the items they need to manage their periods. By providing reusable items for free it removes the constant burden of working out how to finance necessary period products and the need to buy them, it also radically reduces the waste to landfill. Vending machines appear to be an easy solution to limit potential misuse of products or wastage, however, the items are still all single use. The use of machines with timers that control access is paternalistic, disempowering approach; providing access through a basket in a bathroom, through uniform shops, through online ordering are self-determined and empowering.

### Sustainable Products – Scope for a Pilot Study in a Secondary School

It would be ground-breaking for period pants, cups and reusable pads to be offered to all those interested at primary/high school level. Offering sustainable options gives students control and is more empowering than needing to access single use items regularly. In the long term, it is cheaper to fund sustainable products as they last longer and there is significantly less waste to landfill. The students at Melbourne Girls College, a public school in Victoria, as highlighted above commented that when using sustainable period products they felt more comfortable and spent less time in the bathroom.

We believe that consideration of the Period Poverty Bill provides a timely opportunity for the establishment of a pilot project in the ACT to test the feasibility of providing period products on a more sustainable footing. Products, which are sustainable, include menstrual cups, reusable pads and washable period pants.

We have informal interest from a secondary school, which we consider would be a very useful site for a pilot program where there are a high proportion of Indigenous students and students experiencing period poverty.

### Funding

The issue for us is funding such a pilot. We will be approaching ModiBodi, Love Luna and JuJuCup, leading providers of period pants and menstrual cups, to ask for their assistance with a trial. We also believe that there would be merit in the ACT Government financially supporting such a trial. It would further the effectiveness of the implementation of the Bill and demonstrate the ACT's commitment to reducing waste, including for period products. It would be great for this pioneering bill to be accompanied by progressive initiatives like free sustainable period product programs.

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Paula McIntosh, @ZeroWasteSchoolsAustralia  
Jane Grace, Executive Officer, Red Flag Canberra

**25 October 2022**