

1 May 2026

City and Environment Directorate – Waste Policy
GPO Box 158 Canberra ACT 2601

via email: singleuseplastics@act.gov.au

To the Waste Infrastructure Team,

Re: Submission to a Circular Future for the ACT Discussion Paper Consultation

The Australian Beverages Council Limited (ABCL) is the leading peak body representing Australia's non-alcoholic beverages industry. For over 75 years, the ABCL has been the only dedicated advocate for this industry, representing approximately 95 per cent of the industry's production volume. Our members range from Australia's largest drinks manufacturers to small and micro beverages companies whose drinks are enjoyed nationally as well as around the world. These beverages include carbonated soft drinks, energy drinks, sports and electrolyte drinks, frozen drinks, bottled and packaged waters, 100 per cent juice and fruit drinks, cordials, iced teas, ready-to-drink coffees, kombuchas, flavoured milk products and flavoured plant milks.

Industry commitment to a circular economy

The ABCL and its members have been leaders in producer responsibility and circularity for decades. We work to demonstrate our commitment through the development, full funding and participation in container deposit schemes (CDS), participation in APCO and the ANZPAC Plastics Pact, as an accredited stakeholder in the United Nations Environment Programme, and through a variety of additional domestic and international forums. Our members also support recycling through local state-of-the-art glass beneficiation facilities, as well as PET recycling facilities including Albury-Wodonga and Altona North, created through beverage, waste, packaging and government co-investment.

Plastics Adhesives Exemption

The non-alcoholic beverages industry supports the removal of the mechanically attached straw exemption for plastic straws and particularly appreciates the ACT taking steps to harmonise with exclusions already enacted in the majority of the country. However, it is important that any removal of the current exemption for mechanically attached items is accompanied by a clear exemption for adhesives used in paper straws. [As recognised in New South Wales](#), paper straws rely on small amounts of polymer-based adhesive to bond the paper layers and maintain structural integrity during use. These adhesives are technically plastic, but they are an essential component of fibre-based straws and cannot be eliminated with current technology. Without a similar adhesive exemption, the proposed change could unintentionally capture compliant paper straws and effectively remove them from the market, creating a perverse outcome to the policy intent. Aligning with the New South Wales approach would provide regulatory clarity while ensuring the continued availability of non-plastic straw alternatives.

Transition Timeframes

It is also important to allow sufficient transition time for any regulatory change. Many beverage manufacturers, particularly small businesses, purchase inputs such as straws and liquid paperboard packaging well in advance, often up to a year ahead, in order to achieve economies of scale. To avoid unnecessary product write-offs and supply disruption, a minimum transition period of 18 months from the date of notification should be provided, with a 24-month transition period being preferable where possible to allow manufacturers adequate time to source compliant materials and adjust supply arrangements.

We thank you for the opportunity to submit to the Circular Future for the ACT. If you have any additional questions, please do not hesitate to contact Shannon Doherty-Andall, Sustainability Manager on 0406 239 795 or via email shannon@ausbev.org.