

# SETTING THE STANDARD FOR BETTER COMPOSTING



Submission to the Proposed  
Household Waste and Recycling  
Service Standard 2024

## About SECOS Group and MyEcoBag

SECOS Group Limited (ASX: SES) is a leading developer and manufacturer of sustainable packaging materials. Our headquarters and Global R&D Centre are in Mount Waverley in Melbourne's south-east. We are a partner in the Commonwealth-funded Solving Plastic Waste Cooperative Research Centre.

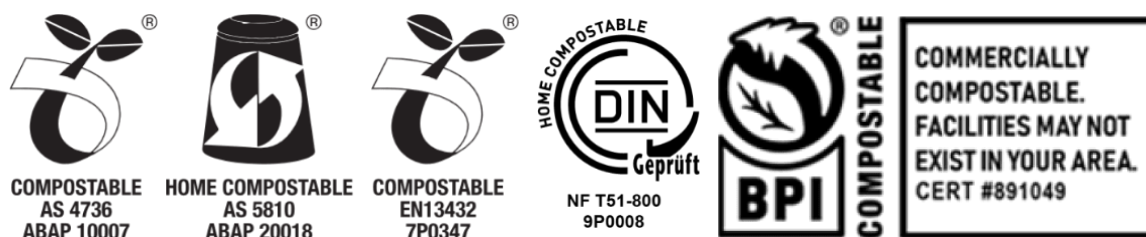
SECOS is integrated from resin production to film production and can develop bespoke compostable solutions for a range of applications. SECOS holds a strong patent portfolio, with the global trend toward sustainable packaging fuelling the growth of our Australian-based business.



Sales offices are located in Malaysia, China, and USA, with a network of leading distributors across Canada, USA, Mexico and Latin Americas, Europe, Asia, the Middle East, Africa, and India.

SECOS supplies its proprietary certified biodegradable and compostable resins and films to a global blue-chip customer base.

Our compostable bioplastic caddy liners are sold in Australia and around the world under the 'MyEcoBag' and 'MyEcoWorld' brand names. These are certified to AS 4736 (Commercial Compostable) and AS 5810 (Home Compostable), having been tested to completely biodegrade and have no negative impact on worms or plant health. We also have several international certifications.



## Executive Summary

The Draft Household Waste and Recycling Service Standard 2024 proposes to prohibit the use of compostable bioplastic caddy liners in Victoria's new standardised four-stream household waste and recycling system, including those certified to AS 4736 and AS 5810.

The use of uncertified and unregulated paper liners, or newspaper, is proposed instead.

More than two-thirds of the Victorian councils that allow food waste in the green bin today already accept compostable caddy liners<sup>1</sup>. If compostable bioplastic caddy liners are banned, evidence shows that food waste capture and composting will reduce significantly (~30%<sup>2</sup>), and households may revert to using soft plastics and other materials which are non-compostable and harmful to the environment.

SECOS strongly opposes any restriction on certified compostable caddy liners in the FOGO stream.

We believe that these liners should be on the standard list for 'accepted' items. Evidence shows this will encourage all Victorian households to compost and divert more food waste away from the general rubbish stream.

At a minimum, discretion should be provided to councils with respect to compostable plastic caddy liners in the FOGO stream: to be accepted or not accepted based on individual contracts with processors. This mirrors the proposed approach outlined in the draft service standard for soft plastics.

<sup>1</sup> Refer to Appendix 1

<sup>2</sup> Refer to Appendix 3

## Background

The Draft Household Waste and Recycling Service Standard 2024 proposes that – “to support the achievement of CE objectives” – compostable plastic caddy liners are not accepted in the FOGO stream, including those certified to AS 4736 and AS 5810.

This marks a departure from the Discussion Paper released in September 2022 which recognised that “council provision of food organics caddies and caddy liners plays a significant role in community uptake of FOGO services and can reduce contamination” and proposed standardising certified caddy liners so that they could be more easily identified by households and the recycled organics industry.

Alternative options for wrapping food waste material and lining caddies, as suggested in the Regulatory Impact Statement (RIS), are paper caddy liners, newspaper sheets and paper towel.

However, these alternatives have poor to nil structural integrity and are therefore not a genuine substitute for certified compostable plastic caddy liners.

### 6.2 FOGO: food organics caddies and caddy liners

Council provision of food organics caddies and caddy liners plays a significant role in community uptake of FOGO services and can reduce contamination.

To support households and compost facility operators to identify appropriately certified caddy liners, it is proposed that they must meet the following requirements to be accepted in the FOGO stream:

- a shade of green (to align with FOGO stream bin lid)

- no handles (to support messaging that caddy liners should remain untied, as knots can remain in compost for a longer period than other FOGO materials)
- certified Industrial Compostable to the Australian Standard (AS 4736).

These requirements are consistent with caddy liners currently available in the market, including in many supermarkets. Councils and alpine resorts may decide if and how they supply caddy liners and/or food organics caddies to the households they service. Councils and alpine resorts may also opt to provide paper caddy liners.

Source: *Discussion Paper: The standard of service for the delivery of waste and recycling services to households by councils and alpine resorts*, September 2022.

Households prefer to dispose of FOGO in compostable plastic caddy liners because they hold decomposing food scraps water-tight for several days, make transfer easy, and avoid odour and other amenity issues that come with disposing food organics material directly into the FOGO bin.

Evidence shows that household participation and FOGO capture rates would decline significantly (~30%) if compostable plastic caddy liners were not accepted<sup>3</sup>.

In its consultation overview, released earlier in 2024, DEECA summarised industry feedback to have been that “if caddy liners are to be accepted in the FOGO stream, [industry] supported standardising them to a single, easily identifiable colour, but highlighted that no liner is preferred due to concerns about contamination.”

We understand that some elements of the recycled organics industry – those that utilise anaerobic digestion as part of a two-step composting process – have made misleading claims and raised concerns about the use of compostable plastic caddy liners specifically. The RIS details these concerns as follows:

- caddy liners frequently contain contaminants such as plastic
- use of caddy liners makes it difficult for processors to detect and remove contaminants from the FOGO stream (as they are contained/hidden in the caddy liner)
- it is not feasible for organics processors to manually open and inspect the contents of all caddy liners due to the extensive time and labour that would be required, and so they are removed by some processors and disposed of to landfill
- knots tied in caddy liners take significantly longer to biodegrade in compost than the caddy liners themselves, appearing as visible contamination
- recycled organics processors need to ensure low contamination rates in the FOGO stream to meet end market requirements for compost products.

Many of the above claims are not specific to certified compostable plastic caddy liners. Others overstate the impact of these bags on certain industrial processes and the cost of doing business for a single minority processor; a narrow view that seeks to prioritise profit margins and biogas production over the objective of diverting the maximum possible volume of food organics away from landfill.

The continued use of certified compostable plastic caddy liners in the FOGO stream is supported by the recycled organics industry (i.e. Australian Organics Recycling Association<sup>4</sup>), the Australasian

<sup>3</sup> Refer to Appendix 3

<sup>4</sup> Refer to Appendix 2

Bioplastics Association, the Victorian Ratepayers & Residents Association, many councils, council-contracted composters (e.g. Bio Gro), and households.

## Achieving circular economy objectives

The Draft Household Waste and Recycling Service Standard 2024 proposes that – “to support the achievement of CE objectives” – compostable plastic caddy liners are not accepted in the FOGO stream, including those certified to AS 4736 and AS 5810.

However, the Victorian Government’s stated objectives for the four-stream household waste and recycling system are to: provide a simpler, consistent household waste and recycling service; reduce emissions; capture greater value of recyclables and result in less extraction of virgin materials; and reduce the volume of household recyclables and organic material being sent to landfill.

Certified compostable plastic caddy liners are directly applicable to the achievement of the latter three objectives. That is; to reduce emissions, compost more food waste, and reduce landfill. Evidence shows that these caddy liners result in a 30% increase in FOGO capture (kg/household/week)<sup>5</sup>.

While maintaining discretion for councils to accept certified compostable plastic caddy liners partially undermines the consistency objective of the service standard, this approach would support higher diversion rates; recognise investment in advanced composting processes; and incentivise the growth of private investment in compostable materials and plastic-alternatives generally.

The capacity to collect and process certified compostable plastic caddy liners already exists at scale.

While some councils do not currently have a FOGO service, of those that do: over two-thirds of Victorian councils<sup>6</sup>, and more than 80% nationally, currently accept certified compostable plastic caddy liners.

It would be a backwards step for the service standards to prioritise statewide consistency over the current high benchmark of food waste diversion and composting that has been achieved with the support of compostable bags.

## Plastic contamination

During consultation, elements of the recycled organics industry raised concerns about the use of caddy liners, including that “[they] frequently contain contaminants such as plastic”.

Most councils have invested in public education to prevent plastic and other non-compostable materials being placed in the FOGO stream by households. A review of council website information reveals two thirds<sup>7</sup> of FOGO councils extend to supplying compostable plastic caddy liners to residents directly, either free of charge or at a discounted rate.

Where rebated or supplied free-of-charge, this is done on the basis that higher food organics diversion rates save councils money through avoided landfill. Compostable bags are estimated to have resulted in approximately \$8 million<sup>8</sup> in avoided landfill costs based on the evidence that they increase diversion rates by 30%.

To support households and compost facility operators to identify appropriately certified caddy liners, it was previously proposed that they must meet certain requirements: a shade of green (to align with FOGO stream bin lid); no handles (to support messaging that caddy liners should remain untied); and certified ‘industrial compostable’ to the Australian Standard (AS 4736). We support this approach.

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<sup>5</sup> <https://mraconsulting.com.au/getting-the-most-out-of-the-fogo-revolution> & refer to Appendix 3

<sup>6</sup> Refer to Appendix 1

<sup>7</sup> Refer to Appendix 1

<sup>8</sup> Refer to Table on p8

Certified compostable caddy liners in themselves are not a contaminant. Caddy liners certified to AS 4736 are independently verified to be biodegradable plastics suitable for composting and other microbial treatment. Accreditation to this Australian standard requires a product to pass tests for hazardous substances (e.g. heavy metals); contain more than 50% organic materials; achieve 90%+ biodegradation in no more than 180 days in compost; and have no toxic effect of the resulting compost on plants or earthworms.

The proposed Household Waste and Recycling Service Standard 2024 obligates councils and Alpine Resorts Victoria and their contractors only. Compliance by Victorian households is assumed by the regulations and the service standard. However, such compliance cannot be guaranteed.

Avoidance of plastic contamination is best achieved through the present mix of education/awareness and the promotion of certified-only liners.

## **Detection and removal of contaminants from the FOGO stream**

During consultation, elements of the recycled organics industry raised concerns about the use of compostable plastic caddy liners, including that the “use of caddy liners makes it difficult for processors to detect and remove contaminants from the FOGO stream (as they are contained/hidden in the caddy liner)”.

This claim is not unique to certified compostable plastic caddy liners, which are semi-transparent. It would also apply to paper caddy liners, which are completely opaque, and are proposed to continue to be accepted in the FOGO stream.

The RIS stated that “it is not feasible for organics processors to manually open and inspect the contents of all caddy liners due to the extensive time and labour that would be required, and so they are removed by some processors and disposed of to landfill”. Such practice should not be tolerated.

Most Victorian-based composters (representing over two thirds of FOGO councils) readily accept certified compostable plastic caddy liners. They have strict processes in place and state-of-the-art processing lines, including mechanical shredding of bags and organics.

Other automated technology – such as hyperspectral imaging – can identify contamination in industrial composting processes with high accuracy.

Government should not accept sub-standard practices from a minority of composters that will hold Victoria back from achieving its circular economy objectives.

## **Knots tied in caddy liners**

During consultation, elements of the recycled organics industry raised concerns about the use of compostable plastic caddy liners, including that the “knots tied in caddy liners take significantly longer to biodegrade in compost than the caddy liners themselves, appearing as visible contamination”. In response to questions from SECOS, DEECA further elaborated that “processing capabilities vary” with some processes “unable to handle knotted caddy liners”.

Certified compostable caddy liners compost more quickly than many food scraps (e.g. avocado skin and pips, corn cobs, and orange peel) and garden organics (e.g. wood chips, branches, twigs, pine needles).

To support households and compost facility operators, it had been proposed that caddy liners meet certain requirements, including having “no handles (to support messaging that caddy liners should remain untied)”. We agree with this approach.

Where knots are still tied by householders, they present no more of an issue for a composter than avocado pips, corn cobs or hard garden clippings.

A minority of composters in Victoria use ‘anaerobic digestion’ as part of a larger process, for which the principal purpose is the generation of biogas. Anaerobic digestion is fast, but effective only with very simple organics. Much of the FOGO material – including hard garden clippings, avocado pips and corn cobs – must be composted in a second stage, using the standard ‘windrow’ method. The final step – second or third step, as applicable – for all composters is the separation of mulch and any oversized components from the compost material.

Of the councils that offer a FOGO service, more than 80% nationally and two-thirds in Victoria, currently accept certified compostable plastic caddy liners; demonstrating that the majority of composters are successfully processing these bags.

Requiring all councils to ‘not accept’ certified compostable plastic caddy liners will lower the standard of composting infrastructure and technology in Victoria to the lowest common denominator, rather than pushing below-standard composters to meet higher standards. This is not consistent with a strong circular economy.

## Tolerance for contaminants

During consultation, recycled organics processors highlighted the need to ensure low contamination rates in the FOGO stream to meet end market requirements for compost products.

The contamination rate in Victorian household mixed recycling bins is 13%<sup>9</sup>. By comparison, the average FOGO bin contamination across all councils in Australia is just two per cent<sup>10</sup>.

Data from Recycling Victoria indicates that the use of certified compostable plastic caddy liners has reduced contamination rates in kerbside collection services across Victoria. Analysis of the *Victorian local government waste data dashboard* demonstrates that the use of these bags results in a 31% reduction in contamination rates across the FOGO services:

	FOGO Councils with CCB	Councils without CCB	Delta
No. of Victorian Councils	30	14	
Organic Waste Diversion Rates (kg/household/week)	7.8	6	30%
Contamination rates	2.7%	3.9%	-31%

Contamination rates are, on average, 2.7% in municipalities where certified compostable plastic caddy liners are accepted. Where these caddy liners are not accepted, contamination rates are 3.9% on average.

Caddy liners certified to AS 4736 are not contaminants; they are independently verified to be biodegradable plastics suitable for composting and other microbial treatment. Accreditation to this Australian standard requires, among other things, a minimum 90% biodegradation in no more than 180 days in compost and no toxic effect of the resulting compost on plants or earthworms.

To support households and compost facility operators to identify appropriately certified caddy liners, it was previously proposed that they must meet certain requirements: a shade of green; no handles; and certified ‘industrial compostable’ to the Australian Standard (AS 4736). We support this approach.

<sup>9</sup> DEECA, *Service standard and associated regulations for the provision of household waste and recycling services Regulatory Impact Statement*, June 2024, pg 31.

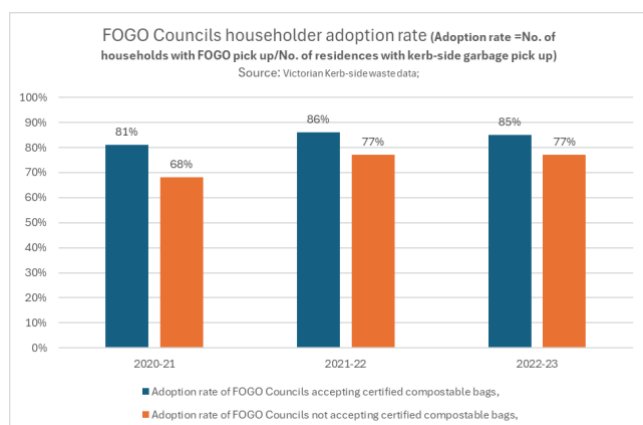
<sup>10</sup> <https://mraconsulting.com.au/getting-the-most-out-of-the-fogo-revolution>

## Diversion rates are a product of caddy liners

SECOS is concerned that the cost benefit analysis has not been adjusted to take account of the role that caddy liners play in determining the proportion of household organic waste which is diverted from a household garbage service following the introduction of a FOGO service.

The RIS assumes the diversion rate for organics is 75% for a kerbside FOGO service. This is based on “consultation with industry and the local government sector” by DEECA.

Analysis of publicly available data and council websites reveals that councils that accept certified compostable plastic caddy liners achieve 30% higher FOGO diversion rates<sup>11,12</sup>. This improvement in diversion rates in Victorian councils is corroborated by NSW data which shows a very similar increase of 27% when compostable bags are used.



In addition, this data shows a significant and sustained increase in FOGO service participation by households (10%, on average) in areas where certified compostable plastic caddy liners are accepted.

It follows, therefore, that a ban on the use of compostable plastic caddy liners is likely to lead to a reduction in the diversion rate.

This, in turn, reduces the benefits (including council landfill cost savings and greenhouse gas emission reductions) articulated in the RIS. Rather than “simply a means to transport recyclable material (food waste)”<sup>13</sup>, caddy

liners are proven to enable and generate a higher diversion rate.

For example, the cost impact of a 30% decline in diversion rates in those councils that currently accept compostable bags would equate to additional landfill costs of \$7.8m and just under 200,000mt of CO2 emissions:

% FOGO waste decline with restriction on certified caddy liners use for existing FOGO councils	Savings by Metro Councils landfill costs (@ a \$100 delta b/n landfill vs organic porocessing costs), on 204,052 mt diverted by Metro Councils in 2022-23 (\$)	Savings by Rural Council landfill costs (@ a \$50 delta between landfill vs organic porocessing costs), on 112,256 mt diverted by Rural Councils in 2022-23 (\$)	Total savings foregone (\$)	Additional CO2 emissions (mt) with consequent lower diversion rates in Victorian Councils that are no longer allowed to accept certified caddy liners
15%	3,060,780	841,920	3,902,700	99,540
20%	4,081,040	1,122,560	5,203,600	132,720
30%	6,121,560	1,683,840	7,805,400	199,080

**Assumptions:**

- Based on 316,308 mt (204,052 mt in Metro & 112,256 mt in Rural) of organic waste diverted by Victorian Councils accepting compostable bags in their FOGO programs over 2022-23 (Vic. Kerb-side waste data)
- Cost of landfill waste in Metro areas of \$220 per mt. (waste levy + charge) vs FOGO processor fee of \$120/mt = a delta \$100/mt. The delta in rural area is \$50 per mt.
- CO2: 2.1 mt of CO2 emitted for every 1 mt. of food waste that goes to landfill.

Additionally, there is a significant opportunity cost to the councils that do not currently accept bags of an estimated \$6 million in landfill costs and 120,000mt of CO2 emissions based on 30% lower diversion rates. This brings the total impact to \$14 million in additional landfill charges and 320,000 mt of CO2 emissions. These figures underscore the crucial role of compostable bags in the FOGO system and the need to adjust the RIS calculations to accurately account for the lower diversion rates, higher costs and CO2 emissions that would result under a proposal to remove them.

<sup>11</sup> Victorian local government waste data dashboard, Recycling Victoria

<sup>12</sup> Refer to Appendix 3

<sup>13</sup> DEECA, Service standard and associated regulations for the provision of household waste and recycling services Regulatory Impact Statement, June 2024, pg 39.

## Paper presents its own risks and is not a direct substitute

In the RIS, it is acknowledged that “some households prefer to dispose of FOGO in compostable plastic caddy liners to avoid odour and other amenity issues that come with disposing food organics material”.

In proposing that compostable plastic caddy liners are not accepted in the FOGO stream, alternative options for wrapping food waste material and lining caddies are suggested. Specifically: “paper caddy liners, newspaper sheets and paper towels”.

For several reasons, paper caddy liners are a poor substitute for certified compostable plastic liners, including:

- Hygiene: food scraps generate a significant amount of moisture as they decompose, causing paper caddy liners to quickly become soggy and lose structural integrity; falling apart. They also fail to contain odours. As a result, households will have to contend with wet food waste spilling and leaking, creating unhygienic conditions.
- Cost: paper varieties are approximately four times the price (per bag)<sup>14</sup> of certified compostable plastic caddy liners, placing a greater financial burden on councils and households.
- Usage life: on average paper varieties have a stated usage life of 2-3 days, compared to certified compostable plastic caddy liners that are water-tight and last at least of 4-6 days in use.



A 100GSM-weight paper caddy liner distributed by a Victorian council displayed degradation and significant leakage at Day 2 in lab tests.

The smaller size and limited durability of paper bags mean significantly more of them must be used – and at greater cost per bag – to divert the same amount of food waste compared to certified compostable plastic caddy liners.

Additionally, SECOS’ compostable plastic bags are made from corn starch. This has a lower environmental impact than paper alternatives even where those are made using materials sourced from FSC-certified forests<sup>15</sup>.

The draft service standard proposes acceptance of newspaper sheets, paper towels and paper caddy liners for the FOGO service when presented as “wrapping for food organics or lining for food caddies”. Whereas coated paper and cardboard – such as “paper straws, paper bags, cardboard bread tags, fish and chips paper, plastic-lined deli paper, coated paper plates” – and food packaging is on the ‘not accepted’ list.

In this regard, paper caddy liners are presumed by the draft service standard to be compostable. However, this is not necessarily the case.

SECOS has been unable to identify any paper caddy liner on the market today that is *certified* to be compostable.

Similar to food packaging, paper caddy bags are often lined to improve their structural integrity. Such linings in paper caddy bags are untested and proposed through the draft service standard to continue to be unregulated, despite the fact they may not fully decompose and may be harmful to soil and compost quality.

There is no mechanism proposed to ensure that paper products are not contaminants in themselves.

For example, there is no certification, testing or assurance proposed that would ensure paper caddy liners accepted in the FOGO stream are free from per- and polyfluoroalkyl substances (PFAS), which are presently utilised in a range of applications including some food contact packaging. While all

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<sup>14</sup> Refer to Appendix 4

<sup>15</sup> [National Geographic](#) & [Carbon Positive Australia](#)



Australian governments have agreed to transition away from their use, it is unclear whether the Australian Packaging Covenant will reach to paper caddy liners (especially those imported directly).

A further worry is that, as print newspaper circulation continues to decline<sup>16</sup>, households may use catalogues and other 'junk mail' instead of newspaper sheets. This raises risks associated with heavy metal contamination from the colour ink used in the printing of such material.

## Consequences of a ban on certified compostable plastic caddy liners in the FOGO stream

Certified compostable plastic caddy liners are today widely accepted as part of council green bin programs and used by millions of householders across Victoria. They fulfil a crucial need by providing a clean and hygienic way for households to collect their food scraps and dispose of them in an environmentally friendly way. Made from certified compostable biopolymers, they are fit-for-purpose in that they can store and hold many kilograms of moist decomposing food when transferred from a kitchen caddy to the FOGO bin.

The limitations of paper products means that some households may choose to use nothing at all. This creates odour and hygiene issues with consequent impacts on the caddy and the green bin, which often becomes lined with rotting food detritus – attracting a higher insect load. This can ultimately affect household participation, especially where bins are stored close to homes or in confined areas. And unlike general rubbish (where refuse is generally bagged), the need to regularly clean green bins would create a new expectation on households, including the need to deal with odorous effluent from bin wash. Further challenges will be created for councils (and their household recipients) that have issued thousands of 'vented' caddies, specifically designed for use with certified compostable liners.



FOGO bin insect load: with and without the use of caddy liners

Caddy liners have been proven to increase FOGO capture, reduce contamination, decrease greenhouse gas emissions from landfill, and lower costs for local government. All while enabling the production of nutrient-rich compost for our farms, parks, sporting fields and gardens.

Adoption of the service standard as proposed would make Victoria the only jurisdiction in Australia to prohibit their use as part of a FOGO service. It would also be out of step with international practice.

The draft service standard undermines the efforts of the Solving Plastic Waste CRC which was established in July 2024 with \$40 million in federal funding. A key output of this CRC is the development of sustainable "materials made from bio-derived polymers meeting municipal end-of-life collection and composting standards".

Compostable plastics are a feasible and sustainable replacement for conventional plastics, including soft plastics. Banning the use of compostable plastic caddy liners will discourage local research and investment in this technology and render local manufacturing opportunities (currently being explored with the assistance of Invest Victoria) redundant. Conventional petroleum-based plastics will continue to proliferate.

A ban on certified compostable plastic caddy liners in the FOGO stream would also remove the economic case for SECOS Group to remain headquartered in Victoria.

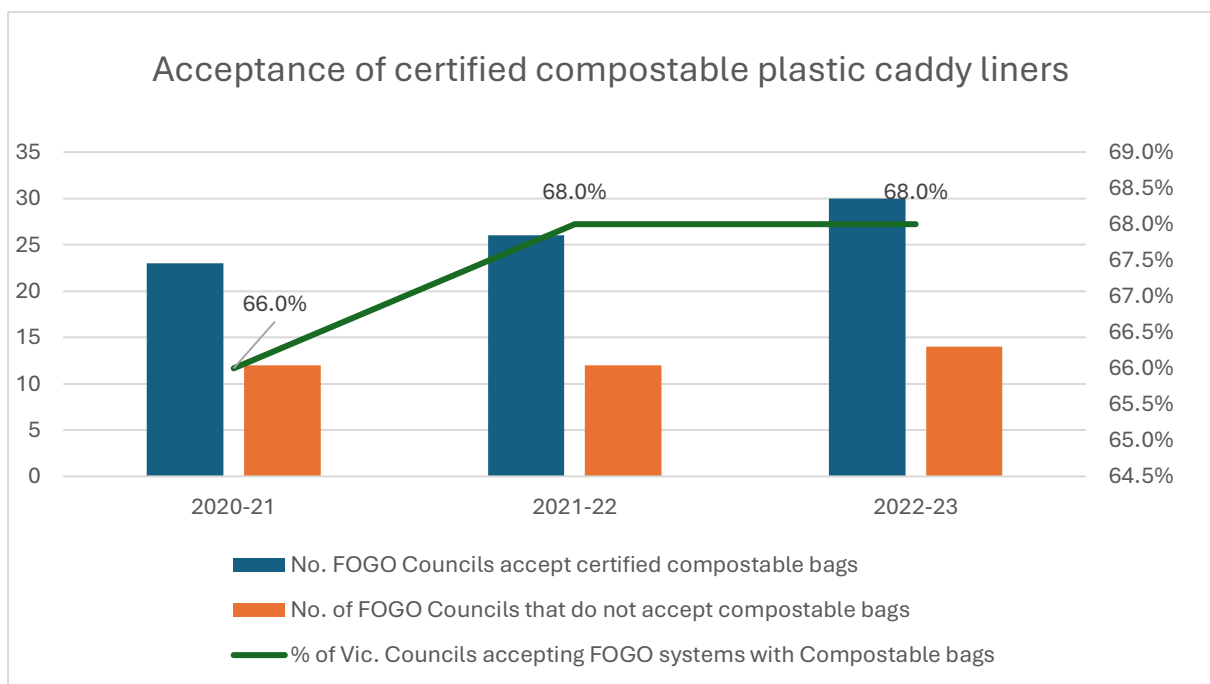
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<sup>16</sup> Newspaper Publishing in Australia - Market Size, Industry Analysis, Trends and Forecasts (2024-2029), IBISWorld

## Appendix 1

Evolution of Victorian councils implementing FOGO services, with and without acceptance of certified compostable plastic caddy liners:

Year	No. FOGO Councils accept certified compostable bags	No. of FOGO Councils that <u>do not accept</u> compostable bags	% of Vic. Councils accepting FOGO systems with Compostable bags
2020-21	23	12	66.0%
2021-22	26	12	68.0%
2022-23	30	14	68.0%



Source: Council website waste information specifying FOGO programs

## Appendix 2



31 July 2024

Mr. Simon Humphris  
Chair, Victorian Executive Committee  
Australian Organics Recycling Australia

Mr Rowan Williams  
President  
Australasian Bioplastics Association Incorporated  
35 Colbert Rd  
Campbellfield Victoria 3061

By email: [rowan.williams@basf.com](mailto:rowan.williams@basf.com)

Dear Rowan,

**Re: Support for Certified Compostable Bin Liners, Food Service Ware and Packaging**

I am writing on behalf of the Victorian Executive Committee of the Australian Organics Recycling Association (AORA) to express our strong support for using certified compostable bin liners, food service ware and packaging in managing food waste.

Certified compostable bin liners, food service ware and packaging offer an effective solution for households and commercial entities to manage food waste efficiently. These liners make it easier for consumers to collect and transport food scraps, increasing participation rates in organics recycling programs. Furthermore, they help maintain cleanliness and hygiene, reducing barriers to participation in these programs.

However, it is crucial that the certified compostable bin liners, food service ware and packaging sold through retail channels are certified and meet stringent compostability standards. Certified compostable products ensure that the materials break down completely and safely in commercial composting facilities, thereby avoiding contamination and improving the quality of the finished compost.

We believe that promoting the correct use of certified compostable bin liners, food service ware and packaging will significantly benefit the composting industry. It will streamline the collection process, reduce contamination, and enhance the overall efficiency of organics recycling efforts. This aligns with our shared goals of reducing organic waste such as food waste and food spoiled packaging from landfill waste and promoting sustainable waste management practices.

We recommend that ABA continues to advocate for the widespread availability and use of certified compostable bin liners, food service ware and packaging. Additionally, clear

Australian Organics Recycling Association Limited  
PO Box 353, Hove SA 5048 | 0434 623 472 | [admin@aora.org.au](mailto:admin@aora.org.au) | [www.aora.org.au](http://www.aora.org.au) | ABN 17 158 519 736



labelling and consumer education are essential to ensure that the public understands the importance of choosing products certified by ABA as conforming to the Australian Standards AS 4736 and AS 5810 as carried in the National Plastics Plan from the Federal Government.

Your efforts in promoting certified compostable products and biobased bioplastics have been instrumental, and we are grateful for your ongoing commitment to this cause. We look forward to continuing our collaboration and supporting initiatives that enhance the effectiveness of organic recycling across Victoria.

Thank you for considering our support for compostable bin liners and packaging. We are eager to discuss any further steps we can take together to promote these environmentally friendly solutions.

Yours sincerely,

A small, stylized handwritten signature in blue ink, representing Mr. Simon Humphris.

Mr. Simon Humphris  
Chair, Victorian Executive Committee  
Australian Organics Recycling Australia

Australian Organics Recycling Association Limited  
PO Box 353, Hove SA 5048 | 0434 623 472 | [admin@aora.org.au](mailto:admin@aora.org.au) | [www.aora.org.au](http://www.aora.org.au) | ABN 17 158 519 736

## Appendix 3

The acceptance of certified compostable plastic caddy liners by Victorian councils offering a FOGO service is associated with a significant and enduring increase in the volume of organic material collected compared to those councils which do not accept such liners:

Year	No. FOGO Councils accept certified compostable bags	No. of FOGO Councils that <u>do not accept</u> compostable bags	% Delta
2020-21	23	12	
Organic diversion rate kg/household per week	8	6.9	15.9%
2021-22	26	12	
Organic diversion rate kg/household per week	8	6.1	31.1%
2022-23	30	14	
Organic diversion rate kg/household per week	7.8	6	30.0%

Source: Victorian local government waste data dashboard, Recycling Victoria

## Appendix 4

Price comparison: various paper caddy liners versus the MyEcoBag certified compostable plastic caddy liner (“MEB”):

Product	Retailer	Price	# of bags	Cost per Bag	Price Premium Per Bag v. MEB 8L	% Price Premium v. MEB 8L
MEB 8L	Woolworths	\$ 4.70	25	\$ 0.19		
Maze 7L	Bunnings	\$ 3.95	10	\$ 0.40	0.21	210%
Maze 7L	BigW & Catch	\$ 16.00	15	\$ 1.07	0.88	567%
Maze 7L	Maze Website	\$ 12.50	15	\$ 0.83	0.65	443%
Maze 7L	Maze Website	\$ 19.00	30	\$ 0.63	0.45	337%
All Green 8L	Amazon	\$ 44.54	50	\$ 0.89	0.70	474%
All Green 8L	Amazon Promotion	\$ 38.88	50	\$ 0.78	0.59	414%
<b>Average of Paper Bags</b>				<b>\$ 0.92</b>	<b>0.69</b>	<b>489%</b>