Japan Machinery Center for Trade and Investment

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Dear Sirs

The Japan Machinery Center for Trade and Investment ("**JMC**") is a non-profit organization with the character of a public-interest corporation. It was established in December 1952 in accordance with the Japanese Export and Import Trade Law under the authorization of the Minister of Economy, Trade and Industry of Japan. The objective of JMC is to engage in activities that enhance the common benefit of member companies and promote the sound development of international trade and investment by the machinery industry. JMC comprises member companies engaged in machinery and systems-related exports and foreign investments such as machinery manufacturers, trading houses and engineering companies. At present, the total number of JMC member companies is about 240.

Our committee handles environmental and product safety issues over products for trade and is strongly concerned with overseas environment and product safety related regulations on product. From this standpoint, we would like to send the attached comment Australia National Plastic Plan 2021.

If you have any questions, please feel free to contact our secretariat (Mr. Chiaki Morikawa, E-mail: morikawa@jmcti.or.jp).

Sincerely yours,

Kanno Yasuhiko

KANNO Yasuhiko
Chairman
Environment Law Committee

Our comment on Australia National Plastic Plan 2021

As for “Phase out expanded polystyrene (EPS) in moulded consumer packaging (July 2022)” in National Plastic Plan 2021, we would like you to consider the electric and electronic equipment (EEE) as exemption according to the following reasons.

1. In order to reduce the environmental impact of EPS (Expanded Polystyrene), Japanese EEE manufacturers have been working for many years to develop alternative materials for EPS throughout its lifecycle, from design, manufacture and transportation to disposal. However, EPS is still an indispensable material for the following reasons.
   (1) There is no alternative to EPS by means of current technologies. In order to sell EEE in Australia, it is necessary to transport them with EPS packaging so as to guarantee the quality of EEE products, which include many precision instruments for long-term transportation through long supply chain from the place of production. In the development process of EEE, cushioning materials are carefully designed after undergoing rigorous vibration and drop tests etc. and then EPS is the most suitable materials for them. If alternative materials of EPS reduce the quality of transportation, this will lead to a worsening of the environmental impact, such as by product disposal.
   (2) Cushioning materials, such as pulp mold and laminated corrugated cardboard, can be considered as alternatives of EPS, while there are the following problems.
      1) Due to their inferior cushioning properties, if any other cushioning materials than EPS are applied to guarantee the equivalent performance, more materials than the amount of the EPS are needed. This will result in much higher environmental impact than EPS. The increase in the amount used also leads to an increase in packaging volume, which will lead to an increase in GHG emissions due to the deterioration of transportation efficiency.
      2) As one of example: the flat display is heavy and the weight is uneven. Therefore, it is difficult to use paper packaging material to absorb this uneven local load. EPS is necessary because the flat display is very delicate. When the panel is delivered, it is strictly packed in EPS to protect it against damage from impact. If the use of EPS is banned in the absence of sufficient packaging technology to replace it, this will lead to product damage during transport, resulting in massive waste and environmental impact.
      3) As another example, air conditioner unit and printer are so heavy, which make paper an unviable alternative due to poor durability against weight and low impact performance, resulting in inferior shock absorbing capacity. Hence it is not a viable alternative to EPS.

4) Pulp and paper moulds and laminated corrugated board can damage products where EPS can avoid damage according to the following reasons.
   a) Once the product has been deformed by an impact, it will not return to its original shape, so the next weak impact will damage the product.
   b) When wet, the impact resistance is significantly reduced.

(3) As other alternatives, such as polypropylene (PP) and polyethylene (PE) are being considered, but their GHG emissions at the production stage are higher than those of EPS, which poses a problem in terms of reducing environmental impact.

(4) The EPS packaging for electronics does not need to be cleaned and is easy to be recycled. It should be treated separately from food packaging that is difficult to remove stains (see * 1) . Therefore, the EPS used for electronics packaging should not be subject to "hard-to-recycle plastics".

(*1) LIFE EPS SURE project of EU (See Page 1) :
https://ec.europa.eu/environment/life/project/Projects/index.cfm?fuseaction=search.dspPage&n_proj_id=6184&docType=pdf

2. Most of the sources of plastic waste are packaging for food, personal care, and healthcare products etc., and the EPS used for these categories should be regarded as the first priorities of scope (see * 2) :

(*2) See Q&A pdf version which is issued together with EU Plastic Strategies (See Page 3, 2nd paragraph of “What are single-use plastics and how are you tackling them? ”)
https://ec.europa.eu/commission/presscorner/detail/en/MEMO_18_6

3. On October 2020, Ministry of the environment in New Zealand government issued a report called, “Reducing the impact of plastic on our environment” that designates later by January 2025: “A ban on all expanded polystyrene (EPS) packaging for products. For this proposal, we sent comment and obtained a feedback recently from a person in charge of Ministry of the environment as follows.

Expanded polystyrene

We heard through the consultation process that phasing out expanded polystyrene will be challenging where it is used to transport cold items like seafood or protect large homeware items across long supply chains. We will work with sector experts to identify possible solutions and areas where alternatives could be used.

Website

Phasing out hard-to-recycle and single-use plastics | Ministry for the Environment

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