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Supplementary Submission on Greenwashing

In our submission to the Senate Inquiry from the 47th Parliament we outlined the need for accurate standards and consumer labelling. We provided examples of misleading labels that were effectively greenwash.

In this supplementary submission we have put our focus on circular economy solutions that could avoid greenwashing, if they are required to be accurately reflected in labelling. The Boomerang Alliance is primarily concerned with packaging, so our commentary is about these products. However, the policies and practices we recommend can be applied to any products in the economy, that are subject to greenwashing.

Recommendations

- That the Commonwealth formally adopt the Circular Economy principles as set out by the Commonwealth Circular Economy Taskforce
- That the Commonwealth negotiate the adoption of these principles by all State and Territory Governments
- That all governments mandate the adoption of these Circular Economy principles to guide policy and practices on the management of products and services used in the economy
- EPR Schemes with mandatory targets are the most effective vehicles to apply circular economy practices. In the case of packaging, an EPR Scheme must be adopted that requires producers to be fully responsible for the management of the products they place into the market for their whole life cycle. That scheme should be designed to manage products according to their highest resource values.

- Consumer labelling is essential to inform users of their discard options under an EPR scheme. Labels must be accurate and true and reflect genuine CE practises. If a product is reusable, refillable, compostable or recyclable, labels should only be used if the product will be recovered/reused in practice and at scale. Accessible collection and other services must be available to consumers to support this and allow the consumer to discard according to highest resource value.
- It is likely that government should standardise what particular words mean and enforce their accurate use with compliance provisions.

About a Circular Economy

A Circular Economy approach should adhere to international principles of a CE economy. These are reflected in the recommendations of the Commonwealth CE Taskforce. These are (1) the elimination of waste and pollution (2) the management of products and materials through the economy, according to their highest resource value and (3) the restoration of nature through enhancing and mimicking natural processes

A circular economy approach would manage these products through the economy through their entire lifecycle, and according to their highest resource value. That includes manufacturing and design to eliminate or reduce material use, emissions and other environmental factors, to fit for purpose use, and post-consumer management to ensure reuse or recovery and return as secondary resources.

Our diagram below illustrates these practices for packaging.

As outlined above, the most effective means to achieve this, would be to require producers of packaging to be responsible for the entire lifecycle of their products. As the responsible party, producers would need to ensure that products are accurately identified and labelled accordingly. Any failure to do so would prevent the product being cost-effectively recovered. This would waste any producer investment and cause reputational damage to both the producer and the EPR scheme.

