

Submission on implementing a lightweight single-use plastic bag ban in Western Australia

Introduction and background

The State Government has announced its intention to implement a ban on light weight single-use plastic bags from 1 July 2018. South Australia implemented a ban in 2008 which was followed by ACT in 2010, Northern Territory in 2011 and Tasmania in 2013. Western Australia and Queensland will implement bans in 2018 and Victoria has opened community consultation with a view to introduce a ban. All bans are for lightweight (35 micron) checkout style plastic bags. Queensland will include biodegradable/compostable bags in their ban.

It is estimated that five million plastic bags enter the natural environment each year in Western Australia. The ban is being introduced based on evidence of the devastating impact this litter has on the marine environment and the potential impact on the human food chain. The community supports a bag ban and research shows there would be no net economic cost from a switch from lightweight plastic shopping bags to more durable alternatives.

This submission outlines the Western Metropolitan Regional Council's (WMRC) response to the discussion paper. The WMRC is a regional council consisting of the Town of Claremont, Town of Cottesloe, Town of Mosman Park, Shire of Peppermint Grove and City of Subiaco.

Executive Summary

The WMRC welcomes the opportunity to comment on the proposed ban on light-weight single-use plastic bags. This initiative is line with community expectations and growing evidence of the harm plastic bags cause to the environment.

WMRC supports option 2 as listed in the discussion paper with the additional inclusion of all biodegradable, degradable, oxo-degradable and compostable bags in the ban. WMRC recommends an additional aim of the ban should be to include waste avoidance and reduction of waste generated and that any alternative bags should attract a minimum charge to customers. This will reduce the risk of retailers simply switching to another single-use bag option. Further to this initiative, the WMRC recommends the government explore measures to address pollution caused by balloons, straws, cigarette butts, polystyrene and pre-production pellets.

The effects of the plastic bag ban need to be measured, reported and reviewed and amendments made if necessary after a set period.

Recommendations:

- 1. An additional aim of the ban should be to include waste avoidance and reduction of waste generated**
- 2. That DWER consider including a minimum price on all alternative bags in combination with the implementation of option 2.**
- 3. Biodegradable, degradable, oxo-degradable and compostable bags be included in the ban.**

4. That the Government explore measures to address pollution caused by balloons, straws, cigarette butts, polystyrene packaging and pre-production pellets.
5. The effects of the ban need to be measured, reported and reviewed and amendments made if necessary after a set period.

Scheme Aims

The aim of the WA lightweight single-use plastic bag ban is to 'reduce the number of lightweight plastic bags that are littered and the associated environmental impacts of this source of plastic pollution'. WMRC believes there should be an additional aim regarding waste avoidance and the reduction of waste generated. This aim will allow for measures in the regulation to mitigate the possibility of retailers simply switching to another single-use alternative all of which have a negative impact on the environment. The outcome of the ban should be that more people use reusable bags.

Recommendation 1: An additional aim of the ban should be to include waste avoidance and reduction of waste generated.

Options to reduce lightweight single use plastic bags

The discussion paper outlines 5 options to reduce lightweight single use plastic bags:

1. Status quo
2. Statewide ban on the sale or supply of lightweight single use shopping bags
3. Plastic bag levy
4. Voluntary agreements with retailers
5. Education campaign

The Government's preferred option is option 2. The WMRC supports option 2.

This option, however this still allows retailers to supply thicker department style bags (typically 50 microns), paper bags and other alternative bags to be given out for free. This could be used as a loophole where retailers can simply switch to thicker bags or paper bags and could undermine the aims of the ban. It also puts no pressure on stores to reduce the use of thicker plastic bags, which from a waste and recycling perspective is problematic. WMRC would like to see a reduction in all single-use bags and suggests considering an option that bans light weight single use bags (as in option 2) and also compels retailers to include minimum price for all alternative bags, including the thicker department store style bags and paper bags (but excluding produce bags). This would simply be a minimum price determined by the Government rather than a levy or tax which would be costly, timely and administratively cumbersome. The addition of the minimum price for alternative bags would take into account the fact that major retailers plan to or already charge for thicker bags. Other states designed their plastic bag bans prior to this announcement by retailers, now WA has a chance to make a ban that keeps up with retailers as well as other states. It also addresses the problems reported in Tasmania where retailers are providing free, slightly thicker single-use bags in response to their ban. As noted in the Discussion Paper, this is under investigation by the EPA in Tasmania. WMRC would like to see the ban achieve its aims and meet community expectations. A ban on thin bags *and* a minimum price on all alternative bags, including thicker plastic bags and paper bags would achieve this.

Recommendation 2: That DWER consider including a minimum price on all alternative bags in combination with the implementation of option 2.

Responses to Discussion Paper Questions

The WMRC has responded to the relevant discussion paper questions below.

It is to be noted that these questions are all in the online survey.

	Discussion Question	WMRC Response
Pg 13 (Local Government Specific)	Can you quantify the costs that will be avoided when the amount of lightweight plastic bags entering the waste stream is reduced and there is less contamination by lightweight plastic bags in recyclables? Are the savings likely to be passed on to ratepayers?	It is not clear what the cost implications of the ban will be. There may be savings in existing waste contracts and reduced litter clean-up costs. Or there may be increases in costs if retailers switch to other more problematic single-use bags such as thicker bags or bags with different composite parts.
Pg 14	Should biodegradable, degradable and compostable bags be included in the bag ban?	WMRC strongly supports including biodegradable, degradable, oxo-degradable and compostable bags in the ban because they do not break down in the natural environment (marine or land). These bags still negatively impact wildlife by ingestion and entanglement. They do not breakdown, they break up in to microplastics and do not solve the issue of plastic pollution in the marine environment. They also cause contamination in the recycling process where plant based bags are mixed in with fossil fuel based bags. There is also research suggesting that bags marked biodegradable, degradable, oxo-degradable and compostable increase littering through the incorrect belief that the bags "degrade and go away". ¹
Pg 18 (Local Government Specific)	Can you foresee any unintended consequences arising as a result of the proposed compliance and enforcement regime?	The WMRC supports DEWR administering the compliance and enforcement of the ban. The only additional responsibility for councils will be to refer residents to appropriate section of DWER if they want to report non-compliant retailers. It is not appropriate for Local Governments to bear the compliance costs of this State Government ban. Compliance relies on public reporting. For this to be an effective deterrent a wide spread community education campaign would increase public awareness of their ability and responsibility to report non-compliance such as the Litter Report Scheme by Keep Australia Beautiful WA.
Additional questions 1.	Do you support a lightweight single-use plastic bag ban for Western Australia?	Yes, decreased litter will improve the amenity, protect our marine and riverine environment and potentially reduce clean-up costs for Member Councils. A ban will change people's behaviour

		and encourage them to bring their own reusable bags. This aligns with WMRC's vision of making good waste practices normal in the western suburbs.
Additional question 2	How concerned are you about lightweight single-use plastic bags polluting our waterways, harming wildlife, persisting in landfill and consuming resources?	WMRC is very concerned. Plastic pollution negatively affects our valued natural environment which in turn affects tourism, commerce and the health and wellbeing of residents.
Additional question 5	When lightweight plastic shopping bags are banned, what alternatives would you prefer to use?	WMRC refers to lifecycle analysis research and would promote the use of all reusable items particularly PET fabric reusable bags with 100% post consumer recycled content as they have the lowest environmental impact ² . From a waste and recycling point of view, the worst case scenario is to replace one kind of disposable product with another disposable product, in particular, paper bags which are shown to have the highest life cycle analysis impact.
Additional question 6	Would you support thicker department store bags being included in a ban in the future?	WMRC would not necessarily support a ban on thicker department store bags because this may result in a switch to paper bags which have a high environmental impact. We would support a fee for all alternative bags, including thicker department store bags and paper bags as this would encourage people to bring their own reusable bags.
Additional question 7	How strongly do you support or oppose each of the following options considered to reduce the environmental impacts of lightweight plastic bags?	<p>Status quo – strongly oppose.</p> <p>Statewide ban on the sale or supply of lightweight single use shopping bags – strongly support with the additional measure of a minimum charge for alternative bags.</p> <p>Plastic bag levy – Strongly oppose, however we support a minimum fee on alternative bags.</p> <p>Voluntary agreements with retailers – Neutral, this could be used to see retailers donate the minimum charge alternative bags to environmental not-for-profit groups.</p> <p>Education campaign – Strongly support, as a essential component of Option 2 with a fee for alternatives. WMRC does not support it as a stand-alone strategy. This is important to ensure people are encouraged to choose reusable alternative bags rather than switch to another disposable option and to report non-compliance.</p>
Additional question 8	What other plastic pollution should the government,	WMRC refers to studies into the impact of various items of marine debris on wildlife. One study states fishing-related gear, balloons and plastic

	businesses and communities work together to address?	bags as the greatest threat ³ . We also refer to our first-hand experience in beach/river clean-ups and knowledge of the waste and recycling industry. We would therefore prioritise further measures to address pollution arising from: Mass balloon releases and advertising balloons. Straws. Cigarette butts. Styrofoam packaging. Pre-production plastic pellets (nurdles)
Additional question 9	What strategies to address other plastic pollution do you think would be most effective?	Mass balloon releases and advertising balloons – these could be banned in public places and are likely to have a strong positive environmental outcome. Balloons are easy to replace with other more environmentally friendly items (bubbles, bunting etc). Straws – these could be banned from bars and restaurants and if necessary replaced with paper straws. Restaurants that do not offer straws have anecdotally noted negligible resistance from customers. Cigarette butts – smoking bans could be implemented along beaches and waterways. This would reduce litter, the impacts of cigarette butts in the environment and encourage healthy lifestyles. The Town of Cottesloe in the WMRC's region are leading the way in WA with a ban on smoking on beaches. Polystyrene packaging – could be banned as a takeaway packaging. From a waste and recycling point of view, this item is also problematic in the recycling stream and could also be banned from supermarkets. They could be replaced with recyclable plastic trays. Pre-production plastic pellets (nurdles) - The Government could adopt the Operation Clean Sweep ⁴ program to ensure nurdle traps at plastic manufacturing sites in Perth are installed. The program also includes education and monitoring and has proven successful in the US, Canada, Europe and NZ.

Recommendation 3: biodegradable, degradable, oxo-degradable and compostable bags be included in the ban.

Recommendation 4: that the Government explore measures to address pollution caused by balloons, straws, cigarette butts, polystyrene packaging and pre-production pellets.

Targets, data gathering and performance measures

It is vital to gather robust, comparable baseline data and to set appropriate targets before implementing the ban. After a set period, for example 12 months, the data should be collected again

and compared to the baseline data and targets. At this point, the efficacy of the ban can be assessed and reviewed. Further amendments should be made if necessary, taking into account the review and any further evidence based information available.

Recommendation 5: The effects of the ban need to be measured, reported and reviewed and amendments made if necessary after a set period.

References

1. Hasham, N (25 April, 2016) The big green furphy: Experts bust degradable plastic bag myth. Online news article available at: <http://www.smh.com.au/federal-politics/political-news/the-big-green-furphy-experts-bust-degradable-plastic-bag-myth-20160425-goe569.html>
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3. Wilcox, C et al (2016). Using expert elicitation to estimate the impacts of plastic pollution on marine wildlife. Online journal article available at:
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4. <http://www.opcleansweep.org.au/>