



City of Perth

2 March 2018

Plastic Bag Ban
Department of Water and Environmental Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850

Dear Sir/Madam

Western Australia Plastic Bag Ban Discussion Paper: City of Perth Comments

Thank you for the opportunity to provide feedback on the Discussion Paper – Implementing a Lightweight Single-Use Plastic Bag Ban in Western Australia.

The City of Perth supports a state-wide prohibition on single-use light-weight plastic bags and the need for a sustainable and collaborative approach by all tiers of Government, retailers, suppliers and consumers in reducing plastic bags.

There is also a need for a clearer understanding of (and agreement to) roles and responsibilities associated with the ban, particularly in relation to enforcement and education. Clarification on the resourcing and funding of community education strategies would also be appreciated, as there is potential risk of cost shift to local governments if key initiatives are not adequately resourced. I understand that the Department of Water and Environmental Regulation will be releasing a Community Education Plan for the plastic bag ban in April 2018.

Please find attached the City of Perth's submission comments and survey question responses. Should you wish to discuss this matter further, please contact Kathleen Ridgwell, Senior Sustainability Officer on (08) 9447 2862 or kathleen.ridgwell@perth.wa.gov.au.

Yours sincerely

Ms Erica Barrenger
Director Planning and Development

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CITY OF PERTH SUBMISSION COMMENTS

WA PLASTIC BAG BAN – SURVEY QUESTION RESPONSES
March 2018

1. Personal details

Submitter name: City of Perth

Contact person: Kathleen Ridgwell
Senior Sustainability Officer

[REDACTED]
[REDACTED]

2. Are you responding as a:

- ☐ Consumer
- ☐ Retailer
- ☐ Plastic bag supplier
- ☒ Local government
- ☐ Waste facility operator

3. Does your organisation support a lightweight plastic bag ban for Western Australia?

- ☒ Yes
- ☐ No

4. How concerned is your organisation about lightweight single-use plastic bags polluting our waterways, harming wildlife, persisting in landfill and consuming resources?

- ☒ Very concerned
- ☐ Somewhat concerned
- ☐ Can't say
- ☐ Not very concerned
- ☐ Not at all concerned

[REDACTED]

5. Would your organisation support thicker department store bags being included in a ban in the future?

- ☒ Yes
- ☐ No

City of Perth Comment: Difficulties may arise in measuring the micron size of bags to determine if they are light-weight or heavy-weight. Also, there do not appear to have been any valid studies undertaken on the reuse of heavy-weight bags. Heavy-weight bags are just as damaging to the environment as lightweight bags, they take longer to degrade and there is an assumption that people re-use heavy-weight bags, however there is little research to verify this.

6. How strongly does your organisation support or oppose each of the options considered to reduce the environmental impacts of lightweight plastic bags?

	Strongly support	Support	Neutral	Oppose	Strongly oppose
Status quo	<input type="radio"/> Status quo Strongly support	<input type="radio"/> Status quo Support	<input type="radio"/> Status quo Neutral	<input type="radio"/> Status quo Oppose	<input checked="" type="radio"/> Status quo Strongly oppose
Statewide ban on the sale or supply of lightweight single use shopping bags	<input checked="" type="radio"/> Statewide ban on the sale or supply of lightweight single use shopping bags Strongly support	<input type="radio"/> Statewide ban on the sale or supply of lightweight single use shopping bags Support	<input type="radio"/> Statewide ban on the sale or supply of lightweight single use shopping bags Neutral	<input type="radio"/> Statewide ban on the sale or supply of lightweight single use shopping bags Oppose	<input type="radio"/> Statewide ban on the sale or supply of lightweight single use shopping bags Strongly oppose
Plastic bag levy	<input type="radio"/> Plastic bag levy Strongly support	<input type="radio"/> Plastic bag levy Support	<input checked="" type="radio"/> Plastic bag levy Neutral	<input type="radio"/> Plastic bag levy Oppose	<input type="radio"/> Plastic bag levy Strongly oppose
Voluntary agreements with retailers	<input type="radio"/> Voluntary agreements with retailers Strongly support	<input type="radio"/> Voluntary agreements with retailers Support	<input type="radio"/> Voluntary agreements with retailers Neutral	<input checked="" type="radio"/> Voluntary agreements with retailers Oppose	<input type="radio"/> Voluntary agreements with retailers Strongly oppose

	Strongly support	Support	Neutral	Oppose	Strongly oppose
Education campaign	<input checked="" type="radio"/> Education campaign Strongly support	<input type="radio"/> Education campaign Support	<input type="radio"/> Education campaign Neutral	<input type="radio"/> Education campaign Oppose	<input type="radio"/> Education campaign Strongly oppose

City of Perth Comment:

A state-wide legislated ban on light-weight plastic bags is strongly supported, however a ban or levy would also be supported for heavy-weight plastic bags. In the absence of a ban or levy on heavy-weight plastic bags, voluntary agreements with retailers to cease or reduce the use of heavy-weight bags would be supported, however this would not be the recommended or preferred option.

Education should have a broader focus than just plastic bags. A comprehensive plastic waste avoidance approach would be of more value (of which plastic bags is a component).

7. Biodegradable, degradable and compostable bags have been shown to persist in the environment and break down into smaller pieces. Does your organisation agree that they should be included in the bag ban?

- ☒ Yes
☐ No

City of Perth Comment: Agreed, as these are equally environmentally damaging and not including them may contribute to consumer and business confusion about which bags are allowed to be used.

8. What other plastic pollution does your organisation think that the Government, businesses and communities should work together on to address?

City of Perth Comment:

Single-use plastics such as balloons (and ribbons), straws, fishing line, drinking bottles, takeaway food containers, utensils, plates and cups, bin liners, produce bags and heavy-weight bags.

Although we acknowledge that balloons are not technically plastic (and that rubber, as an organic compound, is biodegradable), we also acknowledge the danger they can present for local wildlife and



therefore the City would also support working together to prevent the release of helium balloons into the environment.

9. What strategies to address other plastic pollution does your organisation think would be most effective?

City of Perth Comment:

- *Agreements (or enforced compliance regimes / legislation / regulation) with bars, takeaway food businesses and fast food outlets to reduce the use of straws and single use takeaway food and drink containers.*
- *Increase participation in fishing line bin programs with the Department of Biodiversity, Conservation and Attractions.*
- *State-wide ban on the release of helium balloons into the environment.*
- *Improved guidance documents, templates and incentives for running sustainable plastic-free public events.*
- *Provide a list of recommended suppliers of non-plastic alternative items that businesses and event organisers could easily access (e.g., via an online portal).*
- *Statewide ban on heavy-weight plastic bags and fresh produce bags. Supported by increased education for the community on the best alternatives.*
- *State funding/resources for Local Government to provide support, particularly in awareness and education.*

10. Does your organisation foresee any unintended consequences arising as a result of the proposed compliance and enforcement regime?

City of Perth Comment:

It is unclear what the compliance and enforcement regime is. Will State Government be doing spot checks on retailers or relying on reports of non-compliance? How will officers determine if bags are greater than 35 microns in thickness during spot checks?

There appear to be limited consequences for Local Government if State Government carry out the follow-up investigation and enforcement. However, if Local Government is expected to undertake the initial investigation, this will require resourcing/funding from State Government.



There may be increased enquiries from the community seeking clarification or reporting non-compliance, which will need to be redirected to the State Government. Consider setting up a State Government reporting hotline.

There may be social impacts associated with affordability of alternative bags, e.g., businesses will probably charge for heavy-weight and reusable bags. It is unknown if the State Government will be offering free reusable bags for people who are unable to afford them, including vulnerable people such as the homeless.

It is unclear what will happen to all the light-weight single-use plastic bags in circulation after 1 July 2018. Consider a plastic bags return program and recycle the bags into other products, such as furniture.

There may be an increase of alternatives that have high negative environmental impacts based on lifecycle assessment of the product, e.g., single use paper bags. It is suggested that the State Government recommend the best alternatives to use, the ones that have the least impact on the environment, and that this information be made publicly available.

It is unclear how online retailers will be policed.

11. Can you quantify the costs that will be avoided when the amount of lightweight single-use 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?

City of Perth Comment:

In regards to quantifying the costs that will be avoided when the amount of lightweight single-use plastic bags entering the waste stream is reduced, there would likely be no change. As general waste is charged by weight and these bags are light, there will likely be little impact/reduction if there is a reduction of light weight plastic bags in general waste.

For recyclables, we currently do not pay anything for receiving comingled recycling waste and do not pay any contamination fees; therefore the removal of bags from this waste stream will again have no impact or reduction in cost to the City.

Where we would see the most impact will likely be from our street cleaning and the cleaning of parks due to their being fewer plastic bags during litter picking. Unfortunately, this is not likely to decrease the total quantity of litter significantly, nor the time required to undertake this work. Therefore, there would be no savings to be passed on to ratepayers.



12. Other Comments

Local businesses in the City have expressed some concern regarding storage requirements for reusable bags. Reusable bags (and heavy-weight bags) take up more space than light-weight plastic bags to store.

Local businesses have expressed concern regarding their food and drink products leaking and dripping out of reusable bags, which are generally not water-proof. There was concern that this may impact on their business.

Local businesses have expressed concern regarding the cleanliness and washability of reusable bags. There a risk that unhygienic reusable bags may contribute to foodborne illness.

As reusable bags are generally not water-proof, this could have unintended impacts on consumers who purchase newspapers/magazines or other paper products and have to protect products from the rain. This was an issue identified by news agencies in the City.

