



PO Box 27, Quinns Rocks WA 6030

12 July 2019

Reducing single-use plastic
Department of Water and Environmental Regulation
8 Davidson Terrace
JOONDALUP WA 6027

plastic-action@dwer.wa.gov.au

Dear Madam/Sir

Reducing single-use plastics

The Quinns Rocks Environmental Group is a local community organisation promoting conservation and sustainability in the 6030 postcode area and beyond. Our work includes holding bushwalks, film screening and workshops to raise community awareness of the local environment and issues affecting it, on-ground activities such as rehabilitation planting and coastal clean-ups and advocating to protect natural assets and promote sustainable practice by commenting on issues and participating in consultative forums.

Single use plastics pose a threat to the natural environment and our health and wellbeing. Living on the coast we see plastic debris on beaches. While our beaches and coastal waters look clean, on closer inspection such as during clean up days we find plastics including fishing line, plastics from craypots, floats, ropes and consumer items like food packaging, straws, coffee cups and lids, bottle tops, cotton bud shafts and wipes. Plastic bags and wrappings including many from fast foods can also be found in local parks and along roadsides, along with cigarette butts.

Environmental research and monitoring and documentaries drawing on this work (like A Plastic Ocean and Straw which we have screened at public events) have increased community awareness of the magnitude and impact of plastic pollution on our environment. From activities run by the Quinns Rocks Environmental Group, like local clean ups for Clean Up Australia Day, and the participation of members in marine debris collections by others like Sea Shepherd, we have seen how widespread and persistent plastic pollution is in the local environment. Members recently took part in training for the Australian Microplastics Assessment Project - which is involving citizen scientists in better understanding the less visible plastics along coasts and waterways.

We welcomed the introduction of the ban on lightweight plastic bags by the State Government but see the need to do more to address other types of disposable plastics that are too often found in natural areas and residential neighbourhoods. As well as posing a risk to wildlife and to human health, disposable plastics are a waste of resources. Tackling single use plastics is an important focus as we move to more sustainable ways of living and implement low carbon, energy efficient, natural capital restoring and circular economy practices.

Drawing on a number of sources, the Department's issues paper makes the case for action on single-use plastics. We welcome the engagement with the community in working out how to tackle the problems of disposable plastics. While plastic pollution has grown over many years, popular concern and government interest in action is more recent and there is limited evidence on the effectiveness of different options (as the UN Environment Programme's Single-use plastics roadmap report notes). We suggest a process of ongoing dialogue with the community and monitoring and evaluation of the effect of actions to reduce single-use plastics.

That said, we do urge the following actions:

- A ban on plastic drinking straws. Straws are too often littered on beaches and other public places. Alternatives are available and in many situations the use of a straw is not necessary. The need for an exemption or design of viable alternative for disabled people (an issues raised in the media recently) should be considered.
- Plastic shafts for lollies and cotton buds should be banned. Alternatives are available and the use of plastic does not seem necessary. These items are often found on beaches (though we are curious about how cotton bud shafts get there, is it through wastewater treatment outfalls or beach users or down stormwater drains?).
- Investigate options for plastics from recreational and commercial fishing activity. Fishing line and pieces of hard plastic, polystyrene floats and ropes from craypots are commonly found plastics on local beaches. Fishing line collection bins have been used at jetties in the Swan and Canning Rivers. Are they effective in reducing littering of fishing line? Are there alternative materials that could be encouraged or required for crayfishing pots and lines?
- Cigarette butts and filters are noted in the issues paper as commonly littered. Ongoing public health to reduce the prevalence of smoking in the population should help in the long term. Behavioural research could help identify ways to reduce littering of cigarettes by smokers.
- Ban plastic balloons and single use plates, cutlery and cups. Alternatives are available and the use of durable, reusable items for picnics and drinking hot beverages should be encouraged. Materials other than balloons can be used for promotional or celebratory activities, such as signs and fabric banners and bunting. Initiatives such as the Responsible Cafes program should be supported to reduce single use coffee cup use.
- Encourage uptake of alternatives to single use plastic bags for groceries and other retail shopping. Reusable produce bags and containers can be used when shopping, however this does not appear to be widespread. Promotional campaigns and incentives from retailers should help increase and normalise this behaviour. The case for extending the ban on single use plastic bags beyond the current regulations should also be considered, in step with availability of alternatives.
- Community education programs should be supported. We have been involved in the Mindarie Regional Council's Earthcarers program including involvement in community events they have run. Members have taken part in Earthcarers training and hands-on workshops. Building understanding and engagement in the community is important to reduce wasteful behaviours and increase dialogue and support for sustainable practices.

The State Government's efforts to reduce single-use plastics are welcome and we support further measures to tackle this problem. Increasing public support and stakeholder engagement is important to apply and extend action on plastic pollution. Monitoring and evaluating local efforts and those in other jurisdictions is important to track progress and adjust in response to need and innovation.

Single-use plastics are part of a wider waste problem. Promoting a circular economy where products and packaging are reusable or recyclable and low impact and where waste

materials feed back into the production process is important. Building local recycling capacity needs attention, especially given restrictions on the importation of plastic waste by traditional markets like China. This can provide opportunities for local employment as well as helping ensure our community takes responsibility for the waste it generates.

The Quinns Rocks Environmental Group looks forward to hearing of positive action on single-use plastics.

Regards,

David Wake

For the Quinns Rocks Environmental Group Inc



From: [Rachael](#)
To: [Plastic Action](#)
Subject: Approaches to Reduce Single-Use Plastic Items
Date: Tuesday, 14 May 2019 4:35:29 PM

To whom it may concern,

Thank you for the opportunity to have input into this policy direction.

Environment House notes that countries around the world are responding to the plastic crisis in our environment and in waste management with policies that make it the responsibility of producers to reduce the amount of plastic in packaging, increase the amount of recycled plastic content and cover the cost for collecting the plastic that they include in products and product packaging. These types of policies will have an immediate, lasting and direct environmental benefit. These policies will also fast track industry to establish alternatives to cheap, throw away items and establish a circular economy for our finite resources. This removes the onus on individuals and ratepayers, who have the least control over plastic production, to carry this economic and environmental burden. Environment House would urge our state government to adopt a product stewardship approach to waste management.

There are far too many examples of wasteful single use plastic items to create a list. In our view, one product requires immediate action due to its significant design flaws - the fruit juice boxes sold in supermarkets. Fruit juice boxes contain three separate pieces of waste in each box as well as the plastic packaging around bulk fruit box purchases.

If you walk around our school grounds, parks or beaches on any day, there is one item that you will find everywhere - the straw and the plastic sleeve from the straw from fruit juice boxes. These are easily lost or discarded. The sleeve is very difficult to place in a bin due to its size and weight.

Environment House would like to see this item, as it is currently packaged, banned from sale in supermarkets. This is not a product that we need in our schools. A standard fruit juice box contains the same amount of sugar as softdrink, at 170g of sugar in one box of Golden Circle fruit juice. The daily recommended average for a child is 25g of sugar.

This product is profitable because it is convenient to pack in lunchboxes as a throw away item and parents believe it to be healthy because it is being marketed as "fruit juice" and not a soft drink. The reality is that this product is seriously undermining the health of many of our children and their environment.

Thank you for the opportunity to comment.

Kind regards

Rachael Roberts

--

Rachael Roberts
Coordinator, Environment House Inc
125 King William St

Bayswater WA 6053



Ngaala Kaaditj, Whadjuk Nyoongar Moort, keyen kaadak nidja boodja.

We acknowledge the Whadjuk Nyoongar people as the original custodians of this land. We pay our respects to their elders past, present and future.

17/6/2019

Submission to the Water Authority re Single Use Plastic Bags

Thank you for the opportunity to place a submission on this subject.

In and prior to the 1950s there was little waste because almost everything was reused. The only unnatural items to be found on beaches such as at the Mouth of the Moore River and Lancelin were light globes and fishing floats (glass) from ships off the coast. On the beaches I visit nowadays (Conspicuous Cliffs, William Bay, Bicton reaches and Leighton dog beach) things are very different. Fragments or complete items of a variety of articles are to be found.

Interestingly, even the water seems to have a different consistency – there is often a brown foam along the edge of the water on the southern beaches (could it be manure from the sheep ships passing by) and the water seems to have a heavier, greasy look about it, strange as it may seem perhaps.

In pre plastic times most things were able to be mended. Clothing was passed down. Items were glued, nailed, tacked, etc. Every household had equipment to add new soles to shoes etc. A trader came by to purchase scrap metal. A “bottlo” (marine trader) collected glass. Things were made of quality material enabling this to occur. These items were considered valuable property. Now in Australia it is likely that on any beach or land walk we notice evidence of what is an extremely affluent, greatly increased population with a decreased affinity towards the environment - poorly made so called “throwaway” or “disposable” items.

Ultimately all the items which are thrown away have their source from the earth be it oil, mineral, vegetal etc. Each item has a monetary and environmental cost from the original extraction, through the processes of manufacture - transport, energy and water use and atmospheric and land pollution. Ultimately, at the end of it’s life it causes huge dilemmas and costs to sea and land creatures and of course to humans themselves, even when an item has been used several times over.

It is interesting to read the book *The Sea Around Us* by Rachel Carson, author of *A Silent Spring*, who in the 1950s undertook scientific research on the sea and oceans. She was already expressing the concerns of scientists in regards to the future of the seas and oceans, particularly in terms of chemical pollution.

It has taken a long time for people to start getting really serious about protecting our planet. This, I believe is because they are finally seeing a direct correlation between how we treat the planet and the evidence of Global Warming. It is my belief that whether you believe that humans are hastening global warming or not it is evident that we are having a huge detrimental influence on the environment through the way we treat it.

The capitalist system, short term governments and greater opportunity for advertising demand exponential growth with little concern for the effect on the environment. Our increasingly affluent lifestyles and increased populations result in expanded oil and gas industries, mining, large scale agriculture, road building, housing, large scale use of chemicals, land clearing etc. Meanwhile we are turning our valuable resources into rubbish!

In Australia we do at least have the capacity to deal to some extent with our waste but much of the world either by geographical conditions, corrupt governments, businesses and corporations or unsustainable populations have no such capacity. Take a look at the plastic waste clogging up rivers and riparian areas in some of the Asian countries where Australians holiday in luxury. They often have no facilities to handle disposal. In fact they are obliged to take our waste and deal with it in what are often unsuitable conditions in order to eke out a living. Meanwhile their populations are forced to suffer the hazards resulting from the disposal or recycling of items which are thrown out after minimal use in wealthier countries. Increasingly these countries are rightly refusing to accept this waste, particularly if it is contaminated upon arrival.

What can be done to make change from single use plastics? I intend going through your lists and adding a comment where I am able:

Marine and Inland Waters:

It is interesting to look at the percentage of waste collected by your researchers. As someone who rarely walks along a beach or river bank without collecting waste I agree that it is mostly composed of pieces of plastic or fishing gear. However, it is actually very rarely that I see cigarette butts or filters or straws. I sometimes see picnic gear. I suggest that your statistics are coming from data collected at marinas or places such as Elizabeth Quay. These areas act as a waste collection area firstly by their structure and secondly because of the walkways, cafes and restaurants in close vicinity. Wave action "rounds-up" this material into a confined space. In particular, in the case of Elizabeth Quay I imagine, that some of this material washes down from the city streets and into the river. Perhaps some drains go directly into the river or sea?

Some suggestions for controlling this would be to use the device produced in Australia, that encircles the area and extracts the waste items. Perhaps this is already in use at Elizabeth Quay. Notices strategically placed showing pictures of dead fish or the contents of fish and birds which have died because of the inability to digest the pollutants they have ingested may be a deterrent! There is surely something to replace plastic (such as a vegetable fibre) that can be used in cigarettes? This should be mandatory. Perhaps this cigarette waste hasn't been noticed during my walks along the beach or river because it is unrecognisable when broken down.

On the south coast beaches there are the usual small pieces of plastic (mainly hard plastic), small lids and containers, bits of soft plastic and lots of pieces of rope. There is polystyrene too and bait box strapping.

At places such as around Bicton Baths there is very often fishing gear left on the jetty/walkway – plastic bait bags, fishing lines and hooks together with drink bottles. There is the usual collection of rubbish along the beach. On high tides the pollution can be alarming.

One cause for waste along these picnic areas, apart from some people's apathy, could be that the bins overflow or the lids are left open, particularly on the weekend and holidays. A suggestion is that local councils provide more bins, making sure that they have grills to keep out crows and that they empty them more frequently. When the money back on containers comes in it would be imperative that there are clearly marked bins for these items so that these bins are not subject to people rummaging through in search of these items which we finally acknowledge as worth something! I do on occasion see people collecting drink cans from the bins.

One interesting observation is that I have picked up quite a number of dark eye glasses at north Leighton beach (the dog beach). Is this an indication that they are washing in from Cottesloe or Leighton Beach or even Rottneest? Perhaps they are being dropped overboard from boats. This leads to the question as to how much waste is thrown overboard from boats? What is the surveillance regarding this sort of thing? Is some sort of directive be given on boat licensing forms and fines dictated to potential litterers?

Main Litter on Land:

People who smoke (thereby voluntarily ingesting plastic, cadmium, lead and zinc) are unlikely to stop disposing their waste in the street. If the packet has a plastic cover it should be mandatory that it is made only of cardboard with no plastic covering together with an alternative to plastic filter butt.

Together with cigarette waste other items seen are food and beverage containers (take away such as from MacDonald's etc) and plastic bags (often barrier bags). These items are also found around bus stops but I fear that if more bins were made available locals would place their fish scraps etc. in them (as I have seen (and smelt) previously). Perhaps bins with grilling only allowing take-away containers, cigarette boxes and drink containers could be placed here.

Common Sewer Blockers:

As well as causing serious problems to the Water Authority nappies, pads and wipes are one of the pressing concerns to Recycling Centres also. These items contaminate recyclable items making the rest of the items unsuitable for recycling. They also take up a large amount of space. It is horrible to

think of all that contaminant going into landfill when we have a first class sewage system where human faeces are treated properly.

Flush-away society

Nappies: There are alternatives to “disposable” nappies. It really isn't a huge problem to use cotton nappies since automatic washing machines were introduced and the sun is almost always available for drying. Everyone with a baby needs to use the washing machine regularly. We have one of the best waste water recycling in the world so it is one of the cleanest ways to deal with this problem and certainly the cheapest. Also, cotton does not produce microbeads which are dangerous to health of individuals and the environment.

There are also nowadays choices of “Eco nappies” where a pant type affairs with a detachable pad are both able to be washed many times (care should be taken to ensure that they are actually the correct type). An added bonus is that extra pads can actually be made out of recycled old towels etc. This also applies to breast pads. It is important for it to be mandatory that pre natal classes introduce these alternative options together with a cost comparative. It is cheaper to have the Eco type rather than the “disposable”, better for the environment and they can be passed on to a second child or even more children. Information regarding the pricing etc. can be gained from Education Officers at recycling centres and also Google.

Wipes: Well really, who is making a few zillion quid out of these? Not only are they a problem themselves but they are often sold in a plastic container. Through advertising the public is suffering severe paranoia about “germs”. It is known that the most efficient and expedient way of washing ones hands is by doing it often, especially after toileting, shopping and before dealing with food, using flowing water and wiping your hands on a dry towel. A wet flannel can be used to wash babies faces and bottoms. It can be washed in the normal manner and dried in the sun. The use of nappies and wipes must be directed to pre natal classes and maternity hospitals and the issue of environmental concerns discussed – after all it is their children who inherit the earth and it's potential disasters!

For general household, garage and shed use cotton based cloths (such as out of shape cotton T shirts) can be used and washed over and over again.

Problems caused by single-use plastics

Helium Balloons – It is well known that the helium balloons travel huge distances and can land in the ocean where they are problematic in terms of fish ingestion. The use of these should be banned worldwide. They are not a necessity, just a frivolity.

Barrier bags receive five ticks on your list so they are obviously bad news in every situation. The public should be directed to use alternatives and the businesses directed to phase them out. Suggested is that the stores sell half a dozen of the net-like bags clipped together (with no plastic packet) for a low price. These bags can also easily be made at home using old net curtains or similar material in the same way as boomerang bags.

In some cases the use of a barrier bag is expedient – for wet items etc. Public and businesses should be encouraged to allow the use of private containers such as glass containers with plastic lids such as are available in Woolworths etc. These are also much healthier as the food item is not touching the plastic where it is likely to be contaminated through chemical decomposition. Also barrier bags already in one's possession can be rinsed, hung up and used again.

Bunting for elections. This is a government and political party responsibility and should be dealt with under those auspices as according to your literature it is a government ruling that they lead the example on the use (and non use!) of plastics in government institutions.

Cigarettes – see above

Cotton Buds. Go back to using wood sticks. In actual fact cotton buds should not be used for the insertion to ears because of potential damage to the ear drum. They should only be used for cleaning deep wounds. Stipulate that the manufactures find alternatives to plastic.

Cutlery etc. This is an extraordinary problem – so wasteful – and such a risk when so much of it is used in picnic areas or by the sea or river where the items become scattered and end up in the environment. Alternatively they end up in the bins, which in the case of picnic areas, are not taken to the recycling depot for future use. Because they are contaminated they would not be able to be recycled anyway. The public should be educated about this terrible waste of resources in the manufacture and the damage to the environment and they should be shamed into using normal cutlery and plates or a special set of items which can be taken home and washed. Ask people to bring their own reusable set to picnics and barbecues and take them home again. As for using them at home, schools, functions etc.!!!! Many people have dish washing machine and it's not too much trouble to wash a few dishes. This is complete laziness and a huge disrespect to our planet and the environment. It is definitely not a good example to children.

It is good to note that some festivals etc. at least have washing up facilities either a business concern or run by volunteers. Interestingly, some pizza outlets at festivals have been noted to serve their food on a cardboard circle rather than have a complete box which after contamination with grease cannot be recycled. Well done to them.

Customers to festivals etc. should be encouraged to bring their own containers and drinking implements and the health department encouraged to allow them. There should be acknowledgement that this will occur on the pre-festival information.

Straws. Except for people with disabilities these are not necessary. Cafes etc. should be asked to not offer them except in particular circumstances, especially around sea side and riparian areas. It is noted that it is unusual to receive a straw in at least some venues around Fremantle.

Fishing Gear. Vigilance – patrols of beaches and rivers. Advise re fines for boats.

Takeaway Food Containers – see more under Plastic Packaging. Refund systems. Use alternatives to plastic where possible, take your own containers etc.

Do not allow plastic in any circumstances. Either introduce recycled cardboard based items or plant based items (such as from maize or tapioca though of course these require water and chemicals to grow in the first place). Even the latter could potentially take considerable time to break down – long enough the cause problems to the water systems and sea creatures.

Lightweight Plastic Bags. In my observations most people at the local Woolworths are taking their own bags and don't seem to have a problem with it. I hear that one in six bag used is a thick plastic bag. The thicker bags which were introduced should be, at a minimum \$2-\$5 each and the shops and public encouraged to rely on them only when entirely necessary. I recently noted a couple with two trolleys loaded with items inside thick plastic bags. Fifteen bags at \$5 each might be noticeable on their bill!

I understand that shops other than Coles and Woolworths still give out the thinner bags. They need to comply with government mandates or be fined and shamed.

Microbeads. It is good to read that Australia is developing standards for the banning of these. There needs to be legislation/agreement that imports must also comply with our standards. A Choice magazine article lists waste items such as crushed peanut shells which can be used as fillers. Great opportunity for small business ventures to develop this idea perhaps with government assistance. Make available on line a list of which items still contain microbeads.

Pre-packed fruit and vegetables. The pre-packed items are usually cheaper because the producers and shops gain from a larger purchase (eg. you buy a kilo instead of just a couple of apples) therefore it is to the advantage to the shop. Also the second grade, hence cheaper items are pre-packed probably to distinguish them from the first grade items. Admittedly, it is probably easier for growers and middlemen to package on site.

Supermarkets should be encouraged to return to open shelf policy as much as possible.

Most items don't really need to be contained in plastic or any other packaging if the shopper has a shopping bag or box.

Plastic packaging. Regarding food wrap such as Glad Wrap -promote the use for domestic use, parties or picnics - of alternatives - silicon covers, tea towels, a plate or bowl on top of another or put item inside a clean pre-used plastic bag.

Coffee Pods, small containers from planes, mining company camps, hospitals etc. I don't know what can be done about these things. I would ban (phase out) coffee pods altogether. Likewise Squeezy pouches, especially for children's food. It is disgusting and should be completely banned. It is a cop-out and also a health risk with decomposing chemicals entering the child's system let alone the risk of contamination if left open for some time. It is also causing damage to children's jaws and teeth.

China announced strict quality standards for importing recyclables however they are the main producers of these plastics in the first place. Australia has brought in laws regarding the manufacture of packaging here by 2025 but we don't produce much anyway compared to countries such as China and others. They need to be obliged to also sign agreements for stricter manufacturing guidelines (and stick to them)?

Make it obligatory that supermarkets and large stores here demand less packaging and reject packaging that is unable to be recycled.

It should be made mandatory that plastic imports entering Australia be recyclable with the recycling code number clearly marked on each item. If there is a separate top and bottom to an item each part should be numbered.

Alternatives should be used at all times – eg. recycled newspaper and cardboard pulp (as used to make egg cartons). These again should be re-formed as often as able because one concern is that if the alternative to plastic is from trees there will be massively more deforestation. I notice that there is considerable waste from Tasmanian Blue Gum plantations, road widening etc. Surely this can be brought into use rather than being burnt.

Minimalise packaging – it is overdone. Who is gaining from this? The plastic companies and manufacturers.

Thick plastic bags are used as a result of internet purchases and also through the postal service.

Many of these could be replaced by strong paper which can be recycled many times.

Make it obligatory that all stores have RED cycle facilities.

All catering businesses (such as Miss Maud's) must look for alternatives to their packaging and their services. It is ludicrous that containers with what are two different types of plastics and no recycling numbers measuring 42x21x7 cm containing, for example, a bit of rice surrounded by a bit of seaweed (sushi) should be purchased at stores or delivered to businesses and other venues!

Alternatives to the use of plastic, and certainly something with a recycling number, should be mandatory. Not only that, an obligatory return should be placed with a substantial amount put on as a container deposit scheme.

It must also be obligatory that manufacturers and caterers try to find alternatives to the use of plastic film wrap (and alfoil).

Pancake mix sold in large plastic containers half full (also half empty!), the main ingredient being flour, add your own eggs and perhaps milk, is unnecessary and wasteful. Education re home economics (and outside home), health and the environment is essential!!

Similarly, another example of overdone, unnecessary packaging - a Baby Monitor from Uniden and purchased at JB HiFi comes in a double plastic box (with no recycling number) inside a strong cardboard box and probably placed inside a large, thick plastic bag after purchase. There is also another small plastic bag inside the box! The place of origin PRC – were they trying to hide the fact that it was made in China!!

Plastic beverage containers. Most of these which arrive at a the recycling centre do actually get recycled. Many don't get that far. Those placed in bins in public places often do not go to recycling. Therefore the planned cash on return system is excellent.

It is ridiculous and horrifying to note on the shelves of Woolworths that water comes from places such as Norway, France, Switzerland and even Fiji!!!! Not only that there is some from Osborne Park – probably straight out of the tap! We would have to have some of the cleanest water in the world. Why would you not just turn on the tap and fill a non plastic or even a pre-used plastic container? Perhaps we should be lowering wages and salaries as obviously people, apart from watching too much advertising, are getting paid too much to pay for something which is virtually free out of the tap!

Polystyrene. Government to press for alternative. There is also a firm in Perth which is breaking it down and making medical items out of I believe, however I wonder if there are toxic fumes emissions as a result. More money into research.

Takeaway Coffee Cups and Lids. Same as Take Away containers. These are not recyclable because they are lined with plastic (or made from polystyrene), not clean and usually have different types of plastic – lids and base.

Wipes. As above.

Summary – just to reiterate some of the suggestions above.

1. Graphic notices with photos of dead birds and fish showing stomach contents at picnic and cafe areas on near ocean and river. There will be a backlash – that means it has been noticed!
2. Cigarette filters changed to plant fibres. No plastic cover on the packet. National and International Laws.
3. Patrols of fishing areas, particularly at night. Graphic notices in area.
4. “Disposable” plastic picnic gear – ban its use in Australia. Meanwhile provide more bins, more frequent emptying of bins, crowd grills. Education.
5. Directive on boat licences – potential fines. Graphic notices.

LITTER ON LAND

6. Nappies, wipes and breast pads. Public awareness especially at Pre Natal Classes, Day Cares and Recreation Centres. Inform on alternatives and give statistics and cost comparison. Rags only instead of wipes in garages etc.

7. Helium balloons to be banned and the problems re the use of ordinary balloons in open air promoted.

8. Barrier Bags – offer alternatives such as net bags, small boomerang bags. Only paper bags made out of recycled paper. Explore the use of waste wood to make paper bags. Advocate to stores and shoppers and the Health Department the use of clean containers.

9. Bunting from Elections – this is a government and party responsibility. Directives given to all prospective political parties to deal with it responsibly.

10. Cotton Buds. Promote ear damage. Manufacturers to return to using wood.

11. Cutlery and Plates at Festivals etc. Education of vendors and users. Manufacturers to change to plant based cutlery and plates but only to be used when entirely necessary. Washing up facilities at festival. Allow customers and vendors to use customers own implements. Advice re the problems of use into information and request attendees bring their own utensils and cutlery in pre-festival literature.

12. Straws. Limit availability only to the disabled (paper only).

13. Fishing Gear. Would going back to hemp help or would it still be a problem?

14. Take Away Food Containers. Many outlets appear to be introducing cardboard, this should be noted and publicised. Allow use of customer containers.

Put a bond on the return of washed containers which then go into recycling bins.

Only accept into Australia containers which are able to be recycled or composted.

Approach catering companies to clean up their acts and find alternatives.

15. Lightweight Plastic Bags – encourage the use of washable net bag, charge more for plastic bags. Mandatory that all businesses use alternatives and offer net bags at reasonable price.

16. I think that in WA Take Away Coffee Cups all go to waste – not able to be recycled. Encourage discount on customers own containers when purchasing a drink. Research alternatives.

17. Polystyrene. Use recycled cardboard when possible. Support development of alternative packaging. There is a firm in Perth re forming into medical items - query possible toxic emissions.

18. Plastic Beverage Containers – cash on return of clean containers a great idea. Perhaps a place such as used to be (maybe still is) for aluminium cans. I believe that there are innovative ways of dealing with this in Germany.

19. Plastic Packaging – There needs to be a complete overhaul of use. To be considered – plastic touching the food we eat resulting in possible chemical contamination, the use of fossil fuels in manufacture, disposal costs.

Complete ban on squeeze pouches for health and disposal reasons (they can't be recycled).

General Solutions:

Review population growth.

More sustainable, non toxic recycling developed in WA. Research and investment into this.

Encourage investment in alternative sustainable solutions. Ultimately this leads to higher employment in Australia.

More investment in projects such as used clothing turned into building material as at University of NSW. Once again this probably creates more toxic fumes into the environment.

Encourage people to use less – going against the buy, buy, buy mantra to save the economy. What about the environment?

Advise people to turn off their devices, to not watch the advertisements but check out the environment instead.

More sessions of The War on Waste – more money to the ABC to fund these. This has had a huge effect and it is not often one goes out (people of a certain age) when the conversation turns on to The War on Waste and the issues brought up on the programme.

Government manifestos regarding lowering the use of plastic and its proper disposal.

Ban on imports not fitting our criteria.

Compulsory classes on home (and outside home) economic and environmental issues at schools and for migrants.

Somehow instil the message that everyone has to look at their impact on the world and its environment. Impress on the public how our environment is destroyed by the mining of raw material and the manufacture of items they use and their ultimate disposal. We are rubbishing our resources.

Education, education, education in all spheres.

Thank you.

From: [Ruth Arnel](#)
To: [Plastic Action](#)
Subject: community newspapers
Date: Saturday, 25 May 2019 8:21:00 PM

Many community newspapers are delivered to households, and are wrapped in plastic to make delivery easier. Could it be possible, at least in Summer, to use elastic bands to roll the papers instead of wrapping them in plastic?

Yours sincerely, Ruth Arnel



Sea Shepherd Australia
2 Ann Street
Williamstown VIC 3016
marinedebris@seashepherd.org.au

Reducing Single-Use Plastic
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Email: plastic-action@dwer.wa.gov.au

10th July 2019

Dear Sir/Madam

Sea Shepherd Australia Supports Reduction in Single-use Plastics in Western Australia

On behalf of Sea Shepherd Australia and our Marine Debris Campaign we thank you for the opportunity to provide a submission in support of the community consultation on reducing single-use plastics in Western Australia.

The coastline of Western Australia (WA) spans more than 13,500 kilometres and is home to some of the world's most remarkable ecosystems and marine wildlife including the much loved Humpback and Blue whales, endangered Australian sea lions, sea birds and several species of threatened marine turtles – all of which are impacted by marine debris.

Marine debris, particularly ocean plastic, is considered a key priority area for Sea Shepherd globally and here in Australia as the devastating impacts to ocean and coastal habitats and marine life continues to grow at an alarming rate. Marine debris is harmful to all marine life, causing injury, entanglement and starvation when it's mistakenly ingested - all often with fatal consequences to the more than 690+ species. Conservatively 100,000 marine mammals and 1 million sea birds are killed by marine debris each year. Microplastics are now present in drinking water and the food chain with recent studies declaring humans may be consuming anywhere from 39,000 to 52,000 microplastic particles a year, with another study comparing human consumption of plastic to eating the size of a credit card each week.

Single-use plastic products are found almost everywhere in our environment and of course wherever they are found they can and do have an environmental impact. At best the impact is a visual one, and at worse causes damage and often a slow and painful death to all manner of organisms. The impact is universal and getting worse, not better.

The latest figures available on plastic production has 381 million tonnes of plastic produced per year, with around 57% of that amount (218 million tonnes) being made of Polyethylene / polythene (PE) or Polypropylene (PP) Plastic. These two types of plastics are generally used to make single-use plastic items, that are used once for around 12 minutes on average, then thrown away. In 2016–17 the national plastics recycling rate was a mere 11.8%, meaning much of this waste was sent to landfill.

Plastic production expected to double in the next 20 years and currently over 13 million tonnes of plastic is entering our oceans each year. If current trends continue, by 2050 there will be more plastic in our oceans than fish (by weight). Placing bans on single-use items can stem the tide.

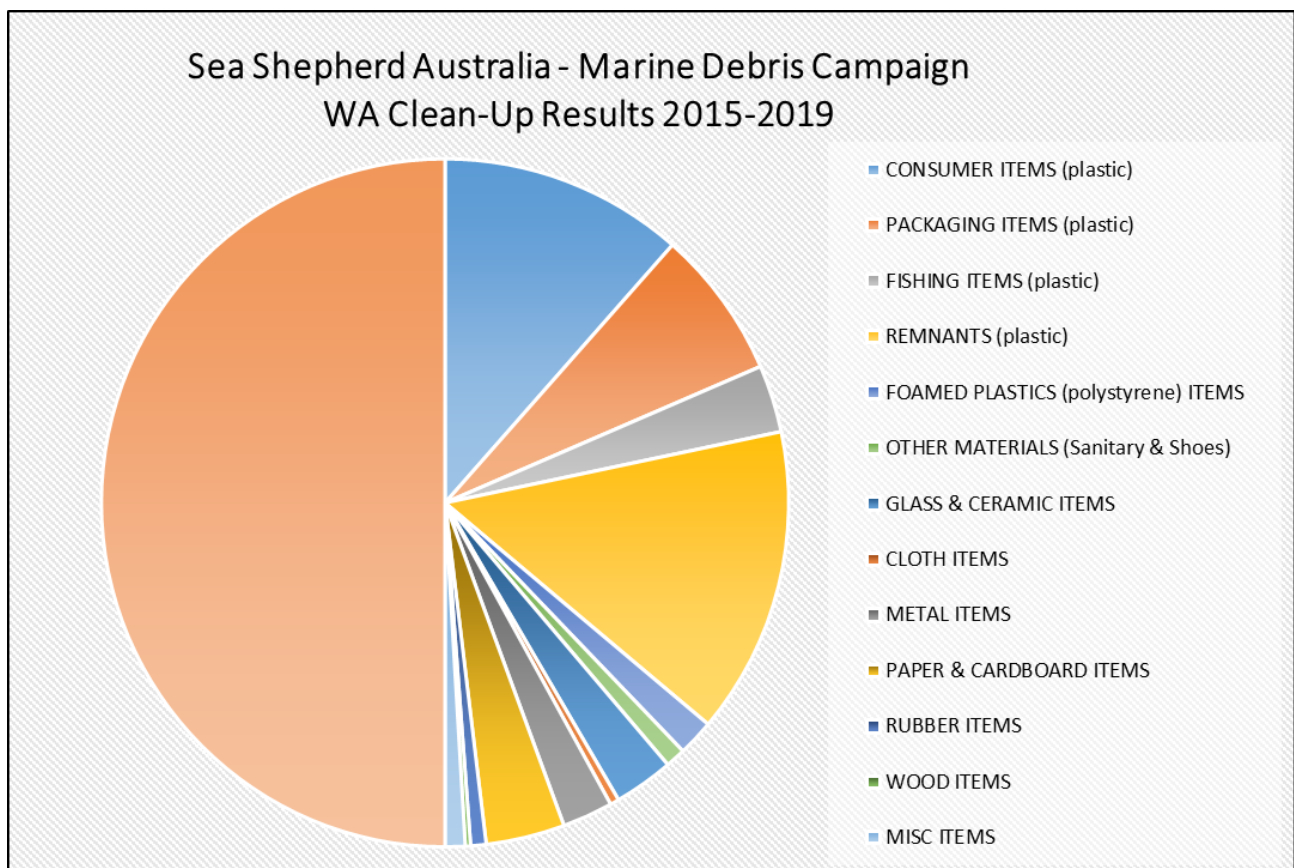
Much of the world’s attention on the great accumulations of ocean plastics has focussed on the Great Pacific Garbage Patch (GPGP) in the Northern Pacific and rivers in South East Asia, but Australian waters off the coast of WA are being heavily impacted.

In 2016 Sea Shepherd Australia launched a national Marine Debris Campaign to address the issue of marine pollution with a focus on plastic. The campaign seeks to engage the broader community through direct-action at their local beaches and waterways and through education on this important issue.

The campaign’s origins started in Perth in 2015 when three Sea Shepherd volunteers began holding monthly beach clean-ups for fellow volunteers, beginning at Coogee Beach. Throughout the remainder of that year, the group invited the public to join their events and refined their citizen science program conducted at each clean-up to capture important data on what was being found. It was the success of these Perth clean-ups that the campaign launched nationally in February 2016. Since then the Marine Debris Campaign has hosted 552 clean-ups around Australia and offshore at the Cocos Keeling Islands.

Through our citizen science program all Sea Shepherd Australia Marine Debris Campaign clean-ups document every item of debris that is collected and then sorted, catalogued and counted. The campaign has involved over 23,000 members of the public who have removed over 2.6 million pieces of marine debris - on average 80% of the items are made of plastic. At every clean-up, single-use plastic items have been found, even at remote clean-up campaigns in Northeast Arnhem Land, NT and Jurien Bay, WA.

In WA, Marine Debris Teams from Perth, Exmouth, Cocos Keeling Islands, Rockingham, Albany and Dunsborough have conducted 195 clean-ups, removing 978,648 items of marine debris weighing 14.9 tonnes. Of that amount, 740,955 items comprised plastic.

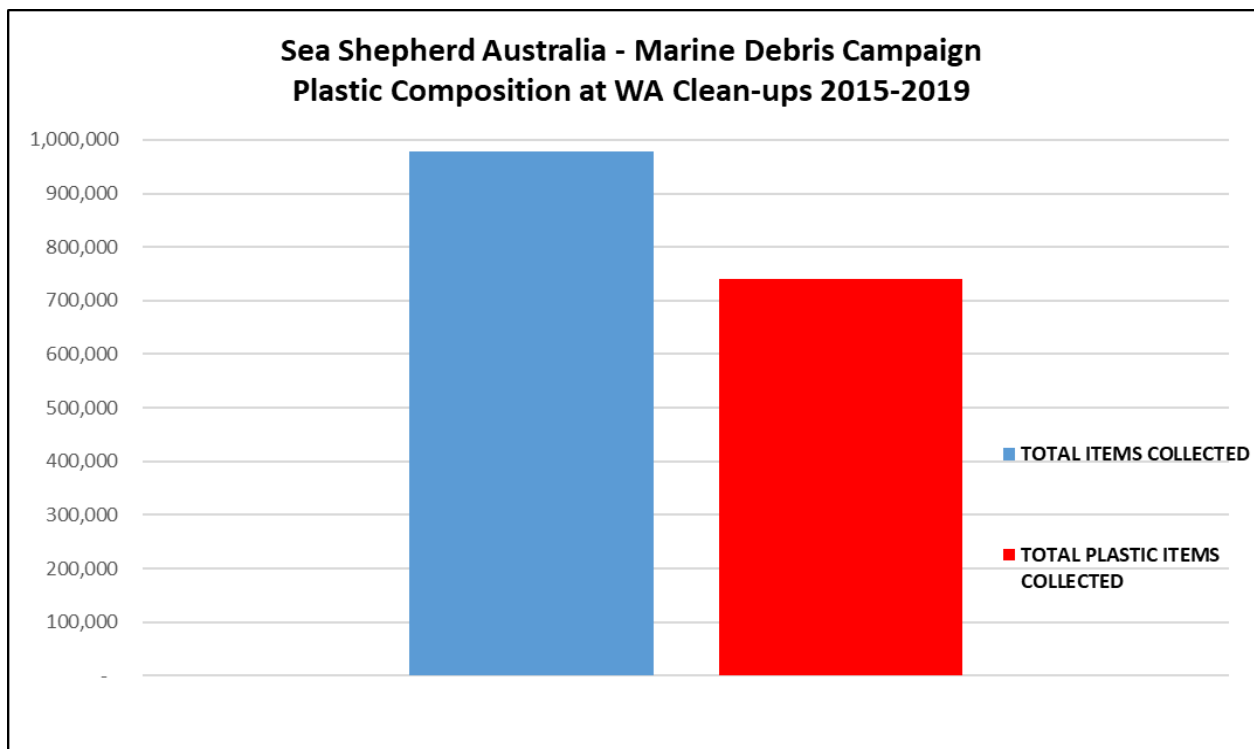


See *Attachment A: Sea Shepherd Australia Marine Debris Campaign – WA Results 2015-2019* for full breakdown by category and item.

The 5 top items removed in WA are:

1. Cigarette Butts: 189,952
2. Hard plastic fragments: 170,199
3. Soft plastic film: 112,126
4. Plastic food packaging: 75,807
5. Paper and cardboard: 67,110

Much of this debris not been removed by volunteers it would have most likely ended up in our oceans. This is only a small percentage of the total debris that is lying around on the WA coastline and floating in waters offshore. 80% of all debris that flows into the ocean comes from land based sources.



It is therefore absolutely imperative that society must REDUCE these environmentally destructive items if we are to make any progress going forward. Single-use plastic by its very nature is discarded after immediate use and is the most likely item to find its way into the environment, marine or land. Most single-use items are very light making them easily blown into the ocean or washed down drainage systems after rainfall, flows into rivers and then into the marine environment.

In 2017 Sea Shepherd Australia’s Marine Debris team worked alongside Dr Jennifer Lavers, a leading research scientist in the field of plastic pollution. Dr Lavers and the team carried out the first comprehensive field survey on the Cocos Keeling Islands(CKI) to establish how affected by plastic and marine debris these unique islands have been. Plastic accumulation on CKI is more severe than previously thought, with a conservative estimate of 414 million pieces of debris present on the islands’ beaches. Of this estimate, 95 percent of the debris was found to be plastic. The results of this study would be of concern to the Department of Water and Environmental Regulation given it provides environmental services to the Commonwealth Government for the Indian Ocean Territories (IOT) of which CKI comes under its jurisdiction.

Even just last week in Perth, Sara Hajbane PhD Candidate in Physical Oceanography from the UWA Oceans Institute, disclosed at a presentation the extent of plastic pollution at the remote Ashmore Reef

in a WA Marine Park off the coast north west of WA. Ms Hajbane advised plastics surveys she had undertaken at Ashmore Reef revealed similar concentrations of plastics to that of the well-known GPGP, which like CKI is hugely alarming. These surveys serve as the canary in the coalmine on the issue of ocean plastics.

Sea Shepherd Australia is urging the following recommendations to ensure there is a step change at the State Government level which addresses the prevalence and increasing impacts of single-use plastics in WA:

1. Implement ban on cigarette smoking on all WA beaches, including on the spot fines for offences.
2. Implement market restrictions (ban) on plastic shopping bags, produce / barrier bags (fruit and vegetable bags), including:
 - Increasing the current ban on lightweight plastic bags (HDPE 35 microns thickness) to single-use plastics bags up to 70 microns.
 - Bag bans should apply to all wholesalers, importers, retailers and hospitality outlets who provide these products to their customers both in shop and online, including all small businesses.
3. Implement a ban on intentional and mass helium balloon releases and plastic balloon sticks and clips.
 - Make amendments to the Litter Act 1979 (WA) to reflect that a litter offence occurs from the act of intentionally releasing a balloon (not when it lands), including on the spot fines for offenders.
4. Implement market restrictions (ban) single-use plastic straws, plastic cutlery (forks, knives, spoons, stirrers and chopsticks), plastic plates, cotton bud sticks made of plastic, all polystyrene food and beverage products ('clamshell' containers, cups (of all sizes), lids, plates, bowls) and glitter including those labelled biodegradable.
5. Implement market restriction (ban) on the sale and manufacture of microbeads, often found in personal care, cosmetic and household cleaning products. The deadline for voluntary industry phase-out by July 2018 is overdue by one year with latest data reporting 6% yet to phase out or commit to phase out.
6. Introduce clear targets for the reduction of the excessive plastic food packaging for all fruit and vegetables and convenience foods sold in retail stores and online outlets. Any packaging of this type should be 100% recyclable as a minimum.
7. Introduce clear, unambiguous and standardised labelling which indicates how waste should be disposed (compostable / recycling and method / landfill), the negative environmental impact of the product packaging, and the presence of any plastics in the products. Such products would include coffee cups, baby/wet/flushable toilet and bathroom cleaning wipes, balloons and sanitary napkins. Any changes to labelling should be supported by educational program.
8. Facilitating investment in infrastructure and initiatives to support increasing the number of public water bubbler / water stations to reduce prevalence of single-use plastic water bottles in the environment.
9. Implement market restrictions (ban) on plastic bait bags. Alternatives are already available in WA, supported by the WA Government.

10. Provide educational signage in multiple languages at known recreational fishing hotspots on the environmental impacts of plastic, particularly related to problem fishing gear. Ban the use of balloons in fishing.
11. Increase signage at popular beaches highlighting the impacts of plastics in our oceans, encouraging beachgoers to take their rubbish home or face fines.
12. Begin working towards a circular economy by developing extended producer responsibility and design guidelines should all be investigated as tools to mitigate against the exponential growth in single-use plastic packaging, much of which is not recyclable in Australia.
13. Establish a Stakeholder Taskforce on Plastics to identify and provide advice on alternative single-use products, innovation and benchmark practices. Representatives to include community and environmental groups, government and industry.
14. Provide funding into better local recycling schemes (e.g. GreenBatch) to minimise landfill and re-use or re-purpose existing single-use plastic. This may involve government subsidies for recycling companies using existing products, while manufacturers using raw virgin plastic should be taxed. Closed loop manufacturing should be the only path forward as the world has more than enough plastic and does not need any more from oil industries.
15. We urge the WA Environment Minister Hon. Stephen Dawson to advocate for a national approach to the reduction of single-use plastics at the next Australian Meeting of Environment Ministers. At that meeting we also strongly recommend the Ministers set a much earlier target of 100 per cent of Australian packaging to be recyclable, compostable or reusable than the current year of 2025 – many other countries have set more ambitious targets like Canada and the EU (bans from 2021).

Anecdotally, generally members of the public attending Sea Shepherd beach clean-up events are vocal in seeing an end to single-use plastics. These views are supported by the results of the single-use plastics consultation carried out in South Australia earlier this year where nearly 99% of respondents recognised the environmental problems associated with single-use plastics and nearly 97% supported government intervention. During the WA Plastic Bag Ban consultation 95% of respondents were in favour of banning lightweight plastic bags.

We recognise the steps the WA Government has taken in banning lightweight plastic bags, introducing a container deposit scheme which is set to launch 2020, instructed government agencies to stop buying all avoidable single-use plastic items such as plastic cups, straws, plates and cutlery, however I am sure you will agree there is very much more to be done to eliminate single-use plastics.

Following the announcement by the South Australian (SA) Government on 8th July 2019 of their intention to ban a range of single-use plastics in SA under proposed legislation to be introduced, we recommend to the WA McGowan Government follow suit.

We call on the WA Government to adopt ambitious directives against single-use plastics that are responsible for polluting our rivers and oceans, impacting marine wildlife, ecosystems and even the water and food we consume. With an estimated 44% of marine mammals, 86% of sea turtles and up to 90% of seabirds having plastic in their guts, every piece of plastic we stop from entering the ocean is a potential life saved.

We look forward to hearing of the results of this consultation and urge the Western Australia Government to act immediately.

Yours sincerely

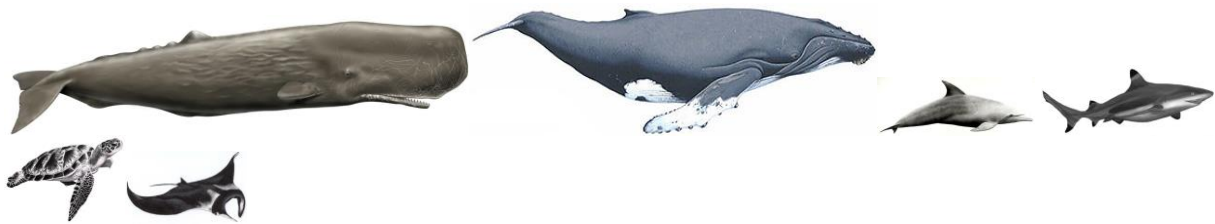


Jeff Hansen
Managing Director
Sea Shepherd Australia



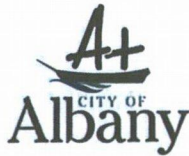
Liza Dicks
Marine Debris Campaign – National Coordinator
Sea Shepherd Australia

Att.



DEFEND – CONSERVE – PROTECT

SEA SHEPHERD AUSTRALIA MARINE DEBRIS CAMPAIGN						
DATA COLLECTION SHEET						
Email: marinedebris@seashepherd.com.au						
WA Annual totals	WA	WA	WA	WA	WA	TOTALS
YEAR	2015	2016	2017	2018	2019	
CONSUMER ITEMS (plastic)						
Cigarette butts & filters	16,594	40,355	55,654	44,907	32,442	189,952
Cigarette lighters	45	370	669	180	377	1,641
Pens markers & other plastic stationery	32	473	385	113	175	1,178
Straws, confection sticks, cups, plates & cutlery	1,449	6,096	10,096	6,765	4,529	28,935
Toothbrushes, brushes & combs, hair ties, etc.	26	279	453	235	359	1,352
Toys, party poppers, ribbons, clips & similar	51	193	705	885	418	2,252
PACKAGING ITEMS (plastic)						
Bleach & cleaner bottles	11	120	21	16	93	261
Lids & tops, pump spray, flow restrictor & similar	879	5,524	5,041	3,248	2,313	17,005
Personal care & pharmaceutical packaging	61	1,036	1,230	1,067	1,378	4,772
Plastic bags supermarket, garbage, dog poo, ice	1,552	3,023	6,190	5,604	1,492	17,861
Plastic containers - non food (oil, sealant, chemical)	5	189	133	69	157	553
Plastic drink bottles (water, milk, juice soft drink)	533	3,008	4,235	3,385	2,415	13,576
Plastic packaging food (wrap, packets, containers)	2,973	18,052	21,021	21,453	12,308	75,807
Plastic wrap non food (bubble wrap, etc.)	72	1,068	329	1,321	2,884	5,674
Strapping band scraps	72	183	328	252	242	1,077
Strapping band whole (record as single item)	8	36	71	100	166	381
FISHING ITEMS (plastic)						
Bait & tackle bags & packaging	129	488	1,062	1,255	520	3,454
Bait containers & lids, bait savers	25	99	184	111	70	489
Commercial fishing remnants (float, pot, crate bits)	3	90	137	159	183	572
Cylume Glow Sticks	83	130	633	627	237	1,710
Fishing line in metres (recreational)	592	5,610	9,734	7,071	5,795	28,802
Recreational fishing items (lures, floats, rods, reels)	93	178	550	492	148	1,461
Rope & net scraps less than 1 metre	999	2,309	6,536	3,779	4,377	18,000
Rope (estimated length in metres)	113	865	2,862	1,724	2,014	7,578
REMNANTS (plastic)						
Plastic bits & pieces hard & solid	3,584	59,662	32,408	51,289	23,256	170,199
Plastic film remnants (bits of plastic bag, wrap etc)	2,252	21,010	41,981	37,793	9,090	112,126
Remnants burnt plastic	4	155	146	71	111	487
FOAMED PLASTICS (polystyrene) ITEMS						
Foam buoys	1	43	65	196	364	669
Foam cups, food packs & trays	308	660	859	837	698	3,362
Foam insulation & packaging (whole & remnants)	182	3,054	5,910	14,844	5,279	29,269
OTHER MATERIALS						
Oil gobules & tar-balls	-	4	42	21	15	82
Sanitary (tissues, nappies, condoms, fem hygiene, cotton buds)	244	894	3,851	6,752	5,809	17,550
Shoes leather & fabric	8	110	265	100	354	837
GLASS & CERAMIC ITEMS						
Fluorescent light tubes & bulbs	-	38	30	106	8	182
Glass beer stubbies & pre-mixed alcohol bottles	805	3,447	4,695	4,580	1,496	15,023
Glass jars & sauce bottles	-	32	781	39	61	913
Glass or ceramic broken	729	3,751	12,548	13,627	6,960	37,615
Glass wine, spirit and similar bottles	88	182	492	229	168	1,159
CLOTH ITEMS						
Binding, thread, string & cord natural	51	72	300	427	217	1,067
Cloth, clothing, hats & towels	356	1,124	2,069	2,208	1,430	7,187
METAL ITEMS						
Aerosol cans	9	24	38	125	54	250
Aluminium cans	618	2,031	5,299	4,318	1,893	14,159
Foil wrappers, packets, bladders & alfoil	348	547	2,491	2,949	3,455	9,790
Metal bottle caps, lids & pull tabs	1,525	4,259	5,562	5,128	3,273	19,747
Metal fishing items (sinkers, lures, hooks, traps, pots)	121	74	1,050	439	409	2,093
Tins under 4 litres (food, drink tins and similar)	15	45	80	221	112	473
PAPER & CARDBOARD ITEMS						
Newspaper, magazines & brochures	1,482	915	484	381	532	3,794
Paper & cardboard packaging	2,439	12,699	21,392	18,116	12,464	67,110
Tetra packs & drink cartons	227	193	492	651	164	1,727
RUBBER ITEMS						
Balloons, balls & toys, elastic straps & bands	189	291	950	994	755	3,179
Rubber footwear & thongs	27	1,733	1,870	359	1,911	5,900
Rubber remnants	84	807	1,964	1,310	962	5,127
WOOD ITEMS						
Brooms, brushes & paint brushes	6	9	9	12	17	53
Processed timber, pallets & other wood:	71	356	987	971	321	2,706
Wooden confection sticks, pencils, matches, etc.	66	501	759	472	366	2,164
TOTAL OF ABOVE	42,239	208,496	278,128	274,383	157,096	960,342
ADDITIONAL ITEMS TOTAL	1,420	2,953	7,316	2,447	4,170	18,306
TOTAL ITEMS COLLECTED	43,659	211,449	285,444	276,830	161,266	978,648
TOTAL PLASTIC ITEMS COLLECTED	32,731	174,358	209,628	209,848	113,890	740,455
Total Kgs	569	2,885	5,086	4,193	2,175	14,908
No of Volunteers	268	1,139	2,122	2,428	1,154	7,111
Bags	99	247	635	731	365	2,077
Length of Beach Cleaned	2,200	7,800	39,800	60,700	32,935	143,435
No. of Clean-ups	10	42	46	59	38	195



Department of Water and Environmental Regulation
Locked Bag 10
JOONDALUP DC WA 6919

11 July 2019

To Whom It May Concern

RE: CONSULTATION ON REDUCING SINGLE-USE PLASTIC

Thank you for the opportunity for the South Coast Sustainable Waste Alliance to provide comment on potential approaches to reduce single-use plastics and their associated impacts in Western Australia.

Through the South Coast Sustainable Waste Alliance the Shire of Plantagenet, Shire of Denmark and City of Albany are committed to working together on a sustainable approach to waste management that meets the needs of our communities in a manner that is cost effective and innovative.

In our unique location the impact of disposable plastics is a growing concern for our South Coast communities who are deeply connected to and reliant on the natural environment. Plastic comprises up to 30% of the contents of our general waste bins and is a frequently littered item along roadsides and in waterways and reserves.

Many critical issues have been raised in the Let's Not Draw the Short Straw Discussion Paper and the South Coast Sustainable Waste Alliance applauds the State Government for pushing for action to address the impacts of single-use plastics. We offer the following comments for your consideration.

Plastic Packaging Target

1. While avoidance of single-use plastics is the preferred choice in the Waste Hierarchy this is not always a valid option. Benefits of plastic packaging include decreased food wastage, lower carbon footprint for transporting goods and efficiency in mass production of commercial goods. To this effect the discussion paper refers to the need for sustainable product design and includes the agreement by government ministers and the Australian Packaging Covenant Organisation (APCO) for "100 per cent of Australian packaging being recyclable, compostable or reusable by 2025 or earlier". While this is a positive step forward the Alliance identifies some significant shortcomings.
2. In the first instance the target only considers Australian goods and has no legislative backing for compliance. The target ultimately needs to be extended to include products not made in Australia but for the Australian market. This potentially could take the form of an extended producer responsibility scheme, but consideration would need to be given to the impact on the end user and potential negative impacts on the poorest and most vulnerable of our society.
3. Significant volumes of plastic waste comes from the packaging of products for transit. Increased priority needs to be placed on more sustainable requirements for packaging materials.

Definitions & Labelling

4. The Alliance also seeks clarification on the definition of *recyclable* in relation to the packaging target. While soft plastics and polystyrene, for example, are technically recyclable, the low market demand and profitability in collection and processing of these materials results in limited genuine recycling options.
5. Current labelling is extremely confusing even for those working in waste and recycling. In a similar vein to WALGA's Consistent Communications and the State Government's Waste Sorted program, a simplified national language needs to be legislated for packaging. This would potentially reduce confusion associated with current terms such as *biodegradable*, *degradable* and *recyclable* and would help reduce contamination rates in kerbside commingled recyclables bins.

Local Solutions

6. Sustainable product solutions such as compostable and recyclable will only be viable solutions to the problem if local solutions can be implemented. For example, when something is marketed as compostable under commercial compost standards this will only be a viable solution if a local commercial compost solution exists. If not, this material will still most likely end up in landfill and become permanent plastic waste. Local solutions must be supported and funded by State Government to ensure that Local Government is not burdened with the expense.

Biodegradable Plastics

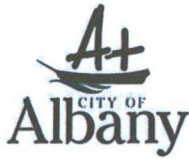
7. The phase out of particular products such as soft plastic bags in 2018 sent a strong message to the community and offers a lot of value not only in removing these issue products from the market place but also through the education of residents of the issues these products present. The greatest value these bans provide is for broader behaviour change, and making people more conscious of their consumer decisions, this forces market pressure on producers. This is something that the State government should continue to pursue.
8. The Alliance recommends that biodegradable plastics be included in any ban on single-use soft plastics. The use of biodegradable plastics does not support the circular economy model and, although less detrimental to terrestrial or marine fauna, still create environmental impacts. The use of biodegradable plastics is a step in the wrong direction, repeating previous approaches which have governed the waste and manufacturing industries across the globe which do not address the need to stop the linear approach to our economy.

Mixed Plastics

9. The current issue of limited markets for mixed plastics is a significant concern. While markets for PET and HDPE plastics appear to be stable there is a growing issue for the options for mixed plastics, especially for regional areas with additional transport costs. The Alliance strongly encourages the State Government to increase funding and resources to seek local and regional recycling options for these types of plastics.

External Plastic Pollution

10. While the discussion paper considers local approaches to the issue of plastics in our environment there is growing concern over waste plastics on WA beaches which have arrived on ocean currents from international sources. To address this



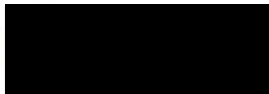
growing problem the Alliance suggests that initiatives to address plastic pollution from other countries be given priority by the State Government.

In summary, the Alliance recommends that the State Government's platform to address the growing impact of single-use plastics in our environment must consider the need for greater product stewardship, standardised labelling and clarity of definitions, consistent language for community education campaigns, assistance with finding local solutions for recycling and composting, strong support through State Government funding and regulation, and inclusion of international initiatives.

Thank you for your consideration of the South Coast Sustainable Waste Alliance's submission on reducing single-use plastics and the associated impacts. We look forward to seeing Western Australia become a trailblazer in the solution to the plastic problem.

Please do not hesitate to contact me on [REDACTED] or email [REDACTED] for further information.

Yours sincerely



Rob Stewart
Chief Executive Officer
Shire of Plantagenet
On behalf of the South Coast Sustainable Waste Alliance

Reducing Single-Use Plastic
WA Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919
By email: plastic-action@dwer.wa.gov.au

10 July 2019

Feedback on single-use plastics

Dear Sir/Madam,

I am writing to provide feedback on the Department of Water and Environmental Regulation (DWER) April 2019 Issues Paper '*Reduce single-use plastics*' (Paper).

The issues outlined in the Paper are of particular concern as I have a background in veterinary medicine, conservation science and animal welfare and have witnessed the devastating effects of plastic waste on animals. Recent scientific papers have highlighted the harm to animals caused by plastic waste globally (Parton et al 2019, Roman et al 2019).

Locally, dolphins in Perth's Swan River have died as the result of entanglement in plastic waste particularly fishing gear (Mercer 2018, WA Today 2018, Guardian Express 2019). Sea urchins on Ningaloo have been documented covered in plastic packaging (A.Sutton *pers. com.* July 2019; Figure 1A) and plastic fragments have been found inside the digestive tracts of loggerhead turtle hatchlings in WA (E.Young *pers comm.* February 2018; Figure 1B).

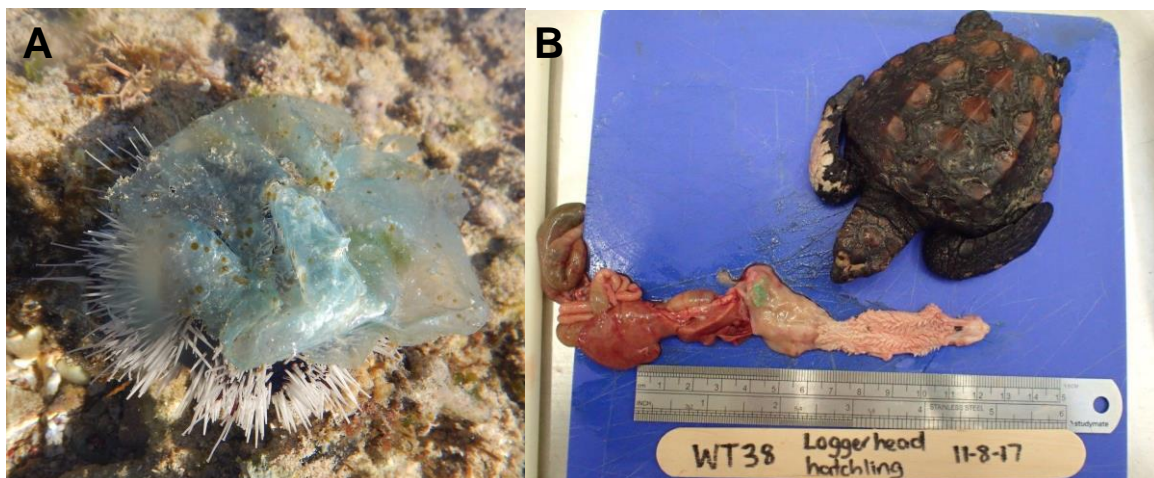


Figure 1A Sea urchins on Ningaloo covered in plastic packaging (A.Sutton, July 2019).
Figure 1B Loggerhead turtle hatchlings found dead after ingesting plastic fragments (E.Young, February 2018).

Single-use plastics pose tangible threats locally and globally. Indeed, "*Unlike other types of pollution, plastic has the potential to injure animals regardless of its environmental concentration, with even small quantities of ingested plastics having negative effects*" (de Vere *et al.* 2018). Together we must reduce these negative effects. Policy, legislative and community action is urgently required to prevent the ongoing harm caused by single-use plastics.

The McGowan Government, Minister for Environment and DWER are to be congratulated for taking action to reduce single-use plastics including the introduction of the WA Bag Ban and Container Deposit Scheme (CDS), the Own Your Impact initiative and State Government funding for the Plastic Free Foundation. However, as acknowledged in the Paper, there is still much to be done to reduce and prevent the negative effects of single-use plastics. Here, I address some of the issues and questions raised in the Paper including specific single-use plastic items, degradable, biodegradable and compostable plastics and plastic reprocessing. My key recommendation is that voluntary strategies must be complemented by robust regulatory tools.

Specific single-use plastic items

Helium balloons

Helium balloons are one of the types of single-use plastic waste mentioned in the Paper. A recent study concluded that balloons (in general not just helium balloons) are the highest-risk plastic debris item for seabirds (Roman *et al.* 2019). Given that there are numerous alternatives to balloons, the suffering and death they cause is entirely preventable (Sustainability Victoria 2019). The City of Fremantle voted in June 2019 to introduce local laws prohibiting the release of helium balloons on council land including parks and beaches. The City of Fremantle's decision is a positive step but this is not an issue that can be adequately addressed by one shire. The threat of entanglement and ingestion remains unless other councils or the state take similar action.

Cigarette butts

Cigarette butts are highlighted in the Paper as a major cause of litter and the question is posed - Should fines for littering of cigarette butts be increased? Under the *Litter Act 1979*, the fine

for littering a cigarette butt is \$200 for an individual. As a participant in several beach clean-ups in the Perth metropolitan area, I can attest that the current legislation is insufficient to deter smokers littering our beaches (Figure 2). For example, on Saturday 23 February 2019, over just a few hours, 57 participants in a Seaside Scavenge retrieved over 1,500 cigarette butts from Burns Beach (Seaside Scavenge 2019).

Prohibiting smoking on beaches would address the significant scourge of cigarette butt litter on WA beaches. Smoking is already prohibited on beaches in three WA local government areas including Joondalup, Cockburn and most recently the Town of Cottesloe (de Kruijff 2019). Smoking on beaches must be prohibited across the state for the benefit of human, animal and environmental health.



Figure 2. Just some of the cigarette butts collected at a Seaside Scavenge (S.Hing, November 2018).

Meat packaging

The Paper highlights barrier bags for packaged meat, poultry and fish as a particular challenge. While some consumers choose not to purchase these products at all, my understanding is that some small businesses permit consumers to bring in their own clean reusable containers to purchase meat, poultry and fish. However, where these products are pre-packaged, it is incumbent upon suppliers and retailers to seek plastic alternatives particularly because no recycling facilities in WA accept meat trays in the yellow-lid recycling bin as of January 2018. Industry and government must commit to plastic alternatives. In July 2018

Plantic Technologies and Coles are reported to have introduced meat packaging made from “a combination of recycled and renewable products” but this is still plastic packaging (Coles Plantic Joint Press Release 2018).

Other items

As the paper highlights, avoidance is the preferred strategy in the waste reduction hierarchy. At present, there are a variety of readily available alternatives to single-use plastic items such as plastic bags, coffee cups, straws, disposable cutlery and even female hygiene products. Over the past financial year, WA has also seen a number of new bulk-foods stores open giving more consumers the choice to purchase their groceries packaging free (Figure 4). However, there remain some everyday single-use plastic items such as stationary items, plastic push tabs for medication and laboratory consumables that may be more challenging for individual consumers to avoid and in these cases solutions must be driven by industry and government.



Figure 4. WA's bulk-foods stores give consumers the choice to purchase packaging-free groceries (S.Hing, November 2018).

Degradable, biodegradable and compostable plastics

Plastic is plastic whether it is degradable, biodegradable or compostable (ie. plastic that will only breakdown in specific conditions and will still degrade into microplastics). In 2016, the Chief Scientist of the United Nations Environment Program (UNEP), described reliance on biodegradable plastics as “well-intentioned but wrong” (Vaughan 2016). Empirical evidence

indicates that there are no significant differences in the degradation of some biodegradable plastics compared to conventional plastics (Hardin and Pretorius 2017) hence they pose the same threats to human, animal and environmental health. Degradable, biodegradable and compostable products must be included in any ban on single-use plastics.

Plastic reprocessing

The current model of plastic reprocessing is untenable. We cannot continue to see entire shipping containers of plastics rejected by overseas buyers due to contamination and growing mountains of single use plastic waste that are stockpiled or sent to landfill (Figure 5). While avoidance is the preferred strategy, effective and efficient local reprocessing is critical to the circular economy. *“At the moment, with no WA-based reprocessing plant, most of our plastic rubbish is either sold into the international waste market or...incinerators”* (Daly 2017).

The WA State Government must explore opportunities for WA-based reprocessing (ie. manufacturing into new products not incinerated). In addition, improved community education is needed to address widespread confusion about what can and cannot be recycled. State Government support for schemes such as ‘Own Your Waste’ should be ongoing to ensure consumers understand that contaminated waste streams ultimately result in vast quantities of recyclables being sent to landfill. Some Perth councils offer residents the opportunity to attend site visits at reprocessing plants and this should be encouraged so we all have an awareness of the scale of our waste, its fate and potential solutions.



Figure 5. Mountains of single use plastic waste at a Perth waste recovery centre (S.Hing, November 2018)

Options to reduce single-use plastic waste

I strongly encourage the WA State Government to continue supporting voluntary plastic waste reduction strategies, agreements with businesses, procurement procedures, education campaigns and behaviour changes strategies. However, these measures are not enough. In some cases, waste reduction campaigns have been running for several decades yet the waste crisis continues. WA supermarkets are still filled with products covered in layer upon layer of plastic. Every day, WA bars and restaurants are still handing out plastic straws and cafes are distributing single-use coffee cups. Regulatory tools are urgently required to reduce the negative impact of all these types of single-use plastic waste as well as balloons, bags (not just bags <30gsm with handles), cigarette butts, disposable cutlery, fishing gear, takeaway containers, microplastics and personal hygiene products.

From April 2020, plastic straws, drink stirrers, cotton buds with plastic stems will be banned from sale and use in England (Harvey 2019). By 2021, an EU law will prohibit single-use plastics items including the above as well as disposable cutlery and plates. The EU also plans to have manufacturers help with costs of cleaning up waste associated with their product packaging (Chow 2018). During the public consultation process early 2019, the majority of over 3500 respondents to South Australia's *Turning the Tide on Single-Use Plastic Products* Discussion Paper, supported legislation to curb single-use plastic and in July 2019, South Australia became the first Australian state to ban single-use plastic items including drinking straws and cutlery. WA, with our unique terrestrial and marine environment, should be amongst the jurisdictions leading on plastic waste reduction. We can and must do more.

Thank you for considering my feedback. If you have any questions, please do not hesitate to contact me.

Sincerely,

Stephanie

Dr Stephanie Hing

BVSc (Hons), MSc Conservation Science, PhD

References

- Chow L (2018) EU moves to ban 10 most harmful single-use plastics. EcoWatch <https://www.ecowatch.com/eu-plastics-ban-2573215290.html>
- Coles Plantic Joint Press Release (2018) http://www.plantic.com.au/Latest_News/coles-plantic-joint-press-release
- Daly (2017) Perth engineer wages war on plastic with WA's first plastic recycling plant. WA today 3 November
- de Kruijff P (2019) Town of Cottesloe to ban smoking on beaches. The West <https://thewest.com.au/politics/local-government/town-of-cottesloe-to-ban-smoking-on-all-its-beaches-ng-b881147582z>
- de Vere *et al.* 2018. Anthropogenic impacts on the welfare of wild marine mammals. *Aquatic Mammals* 44:150-180
- DWER (2017) Implementing a lightweight single-use plastic bag ban in WA – discussion paper.
- Guardian Express (2019) Swan River dolphin calf dead after being tangled in crab net <https://www.communitynews.com.au/guardian-express/news/swan-river-dolphin-calf-dead-after-becoming-tangled-in-crab-net/>
- Harding KG and Pretorius GS (2017) “Biodegradable” Plastics: A myth of marketing. *Procedia Manufacturing* 106-110 <https://www.sciencedirect.com/science/article/pii/S2351978916301901>
- Harvey F (2019) Plastic straws, cotton buds and stirrers to be banned in England. The Guardian <https://www.theguardian.com/environment/2019/may/22/england-plastic-straws-ban>
- Mercer D (2018) Swan River dolphin Highnitch found dead with tackle wrapped around its fin. The West Australian <https://thewest.com.au/news/animals/swan-river-dolphin-found-dead-with-tackle-wrapped-around-its-fin-ng-b88935416z>
- Parton KJ *et al.* (2019) A global review of shark and ray entanglement in anthropogenic marine debris. *Endangered Species Research* DOI: 10.3354/esr00964
- Roman L *et al.* (2019) A quantitative analysis linking seabird mortality and marine debris ingestion. *Scientific Reports* <https://www.nature.com/articles/s41598-018-36585-9>
- Seaside Scavenge (2019) Independent scavenging WA <https://www.seasidescavenge.org/blog/2019/3/4/independent-scavenging-wa>
- Sustainability Victoria (2019) Balloons <https://www.sustainability.vic.gov.au/You-and-your-home/Live-sustainably/Single-use-items/Balloons>
- Vaughan A (2016) Biodegradable plastic ‘false solution’ for ocean waste problem. The Guardian <https://www.theguardian.com/environment/2016/may/23/biodegradable-plastic-false-solution-for-ocean-waste-problem>
- WAToday (2018) Dolphin calf dies after fishing line tangle in Swan River <https://www.watoday.com.au/national/western-australia/dolphin-calf-dies-after-fishing-line-tangle-in-swain-river-20180828-p500da.html>

- END -



Sweeter Banana Bread

Email to: plastic-action@dwer.wa.gov.au

10 July 2019

Dear Minister

Sweeter Banana Co-Operative Submission to issues paper on single use plastics

The Sweeter Banana Co-Operative has been packing and marketing Carnarvon Bananas since 1998 and over the last 20 years has enabled the Carnarvon banana industry to remain a sustainable and viable industry employing over 100 people through direct employment and indirect supply chain partners.



Figure 1 - Sweeter Bananas in Store Display

By encouraging West Australians to purchase Carnarvon Bananas we create WA jobs, reduce Carbon emissions by reducing imports from Qld and provide Western Australians with a better tasting and spray free banana.

However our industry is under threat from the continued push against plastic and packaging, despite the fact that our packaging uses less plastic than that which comes with “loose bananas”.



Sweeter Banana Bread

We make the submission below so that Government and the Minister understands that there is no easy solution, and in particular local businesses need to be supported in our endeavours to reduce single use plastic.

We invite you to visit Carnarvon and see for yourself the issues that we face and the challenges we are responding to, as well as the innovation and opportunity we have created by turning a banana that was the cheapest and often thrown away due to imperfections, into the premium banana in WA.

Sweeter Banana Co-operative – Background

So why do we need to package our bananas.

Carnarvon bananas are sub-tropical and therefore very thin skinned. Under normal supermarket conditions (people picking them up and putting them down, breaking bananas from the hand etc.) they become bruised, unsaleable and subsequently result in very high volumes of food waste.

Before we started packaging, we were throwing away 60% of our crop and the major retailers would not stock our bananas. The industry was on its knees with no market as the larger (thicker skinned) Qld banana was preferred by all the supermarkets – no-one was buying Carnarvon bananas because they didn't look as good or last as long. Our bananas are smaller and more skin markings due to the way we grow them as we grow them close together to create a micro climate, and this results in the leaves rubbing on the banana and creating blemishes on the skin.

Putting the banana in the bag changed the market, We are now sold in all the major retailers and people understand that Carnarvon Bananas are grown differently and taste different. Initially, in the 90's, when the growers formed the co-operative the packaging was about branding, but we soon realised that it protected the bananas from marking, which meant that consumers kept buying them.

Without the packaging we have high food waste and ultimately, we would not be able to grow and market bananas from Carnarvon. All bananas would then need to come from Kununurra or Far North Queensland, which would have a greater carbon footprint and greater environmental impact than our packaging.

The packaging has reduced our food waste from 60% to 4%. To put this into context this has saved over 1560 tonnes of food waste from our production system in an average year. Waste of only 4% is unheard of in horticulture and Sweeter Banana's success is purely due to our investment in packaging and education of consumers.

Co-Operative how it all began

The Sweeter Banana Co-Operative was formed in 1998 by growers who were selling their bananas at below the cost of production. Initially established as a marketing group, the co-operative established a packing shed for consistency and quality control. Packing on behalf of over 20 farming



Sweeter Banana Bread

families the co-operative has developed value added products, direct markets and invests in the marketing and promotion of Carnarvon Bananas.

Sweeter Banana packs and markets 50% of the production volume from Carnarvon, however 90% of the bananas sold from the region are packaged to ensure shelf life quality is maintained.

Our Environment and parameters for packaging

Bananas are grown in our arid sub-tropical environment. This means we can get very high temperatures with summer heat as high as 45 degrees Celsius, and 100% humidity, the other extreme is low humidity periods where hot winds from the desert can result in drying air with less than 10% humidity.

The high heat, extreme low humidity and extreme high humidity impact on the shelf life of any packaging that we use. Particularly with compostable packaging we need to ensure that packaging can sustain these extremes of temperature and ensure that the packaging does not begin to break down before we use it.

The packing shed environment is wet, with all bananas washed and sanitised in chlorinated water and water sprinklers used to cool fruit in hot summer temperatures.

Due to these conditions many types of packaging are not suitable - for example paper or cardboard can become soft and tear when exposed to moisture. In addition retailers have advised that consumers like to see what they are purchasing when they buy bananas so any packaging needs to be clear.

Our requirements for any product to replace our packaging is that it needs to be clear, have longevity in our hot and dry or hot and humid environment, be impervious to moisture as bananas are wet when packed, and be cost effective –i.e. We can't increase the cost of our bananas significantly because of more expensive packaging and expect the consumer to pay more.

Banana growers are “price-takers” that is the price of bananas is set by the market, depending on the volumes from all around Australia. This is how the supply and demand driven fruit and vegetable market operates in Australia.

This means that we cannot set a price for our product, if we are too expensive compared to the Qld banana consumers will not buy and as bananas are fresh produce and deteriorate with age, we cannot hold them for another week or month until the price goes up.

Any additional costs for more expensive packaging may need to be borne by the producer. In a market where the sale price often dips below the price of production, this would mean growers making a loss.



Sweeter Banana Bread

Environmental Benefits of Sweeter Bananas

There are many positive environmental impacts of our bananas - versus bananas grown anywhere else:

- We use zero pesticides, insecticides or fungicides in the growing or post-harvest process for our bananas. This is unusual; Bananas grown in other parts of Australia and worldwide are routinely sprayed/dusted/injected with fungicides, insecticides and pesticides. There is no “greener” Banana than a Carnarvon Sweeter Banana.
- Our bananas are naturally grown using Bugs for Bugs to create a healthy eco-system – we don’t use any insecticides, pesticides or fungicides instead using healthy insect populations to control pests. Walk through our plantations and you will see a variety of bugs and spiders. Dig up our soil to find many beneficial insects living in the ground.
- We use minimal fertiliser hence the small size of our bananas.
- Sweeter bananas take twice as long to grow than tropical bananas and are therefore sweeter and creamier with more banana taste.
- We pack into re-usable crates for our bananas. All Queensland Bananas are shipped in Single use cardboard cartons. I have obtained information from the suppliers of the crates on the environmental benefits of this and I have detailed them below.
- Crates vs Corrugated Cardboard Cartons
 - Produces 31% lower CO2 emissions
 - Produces 85% less solid waste
 - Consumes 65% less water
 - Requires 34% less energy
 - Contributes significantly less environmental pollution (72% lower eutrophication, 51% lower ozone depletion and 48% lower acidification)
- Most “loose” bananas are packed in single use cardboard cartons with a large plastic bag inside, and sheets of plastic interleaved between each hand to protect them on their journey from long distances away. Just because packaging is not visible on the shelf it doesn’t mean that those bananas are plastic free. Our packaging is thinner and there is less of it than that used for “Loose” bananas.
- Our bananas are freighted only from Carnarvon to Perth, about a fifth of the distance that Bananas from Qld must travel. That equates to less food miles and therefore lower carbon emissions.
- We support over 30 families of farmers and workers in our co-operative, supporting traditional small-scale farming which gives back to regional communities.
- Our bananas taste so much better because of the length of time and natural processes we use to grow them.
- Our bags can be recycled in the soft plastics bins (REDCYCLE) <https://www.redcycle.net.au/faqs/> at Coles and Woolworths supermarkets. This is recycled in Australia by Replas and used to make things like playground furniture, outdoor furniture, bollards, decking, signs, fitness trails, and road base. It is all reused and manufactured in Australia. <https://www.replas.com.au/> There is an interesting video on how this process works - <https://youtu.be/eXX5l9xy6p8>. Bins are found in all Coles and Woolworths supermarkets to collect soft plastics.



Sweeter Banana Bread

What have we tried?

Zero Packaging

Last year we did a trial with Woolworths Geraldton, where they stocked only our bananas in their two stores, both loose and packaged. After 6 weeks they stopped the trial as customers complained of the poor quality of the loose fruit, even though it was the same as the fruit that was in bags. The fruit just didn't hold up on the shelves. As a result of this trial we know that zero packaging is not an option for us. We would simply go out of business as consumers would be buying our product. This is the situation the growers were in prior to the introduction of the bag.



Figure 2 Banded bananas - the solution was given up on by East Coast producers due to the uneven sizing of hands of bananas

Banding solutions

We were working on a paper banding solution, which would keep the bananas together and (hopefully) stop in-store handling damaging the bananas. However, early trials on the east coast show this method does not work well for bananas (as opposed to say celery or spring onions) because of the variability in size and shape of the hand.

The suppliers are now working on a new solution which includes stretchy plastic and paper. We have not had the opportunity to trial this yet and are waiting for samples.

Coles are using this for bananas on their kids' bananas on the east Coast. We won't know until we trial it if it delivers the protection and shelf life we are seeking. But being a relatively small player in the Australian Banana market (compared to the mass production in Far North Queensland) suppliers are not prioritising our requests for trial products as innovative ideas are being snapped up by those with greater volumes.



Figure 3 Fyffes is an international brand that has developed a banded solution; however this is not available in Australia

Fyffe's is an international Banana Brand which has developed a solution using banding, however this is not available yet in Australia and the IP may be owned by Fyffes. It is unclear if this solution also uses plastic or rubber. These bananas are not available in Australia so we can't test the solution.



Sweeter Banana Bread

Compostable Cellulose “plastics”



We have tried some compostable “plastic” made from cellulose, but it breaks down too easily and doesn’t cope with the heat or humidity – the compostable bags were tearing when we were packing into them. We have determined these were not fit for our purpose. The challenge is finding something that is compostable but can also deal with moisture.

Figure 4 Example of one of the compostable - cellulose bags (with paper) that was trialed but failed as it could not withstand moisture.

New age home compostable materials

Samples of new compostable material from Europe are being sent to us to trial. Early indications are that this will be around 5-6 times more expensive than plastic bags, and we need to trial the product to ensure it stands up to our environment. We also need to weigh up the carbon emissions on packaging from Europe vs plastic bags made in Australia. However, we are working on this as a potential solution.

As farmers we don’t like adding costs when they are not needed. If we could remove the packaging and packing process it would save us a significant amount of money and labour, but we would be forced to stop growing bananas as there would be no market for them.

Banana leaves for Packaging.

There are many practical reasons why we can’t pack bananas in banana leaves in Carnarvon.

Importantly we are not permitted to ship leaves or plant material to Perth due to biosecurity laws, because leaves can carry plant disease. As the current legislation stands the process would be illegal. Given the issues facing the banana industry in the world today with the rapid spread of Panama Tropical Race 4 and the potential destruction of the entire banana industry, it is unlikely this regulation will change.

Even if we could send leaves out of the region, the process to find leaves that are not torn by the wind is very difficult. We have strong sea breezes as we are located on the West Coast and by the time we harvest bananas the leaves are shredded. Plants that have not been harvested need all their leaves to create the photosynthesis required to grow the fruit.

Recently harvested leaves for a photo shoot and it took me around an hour to get four large leaves without tears. The labour costs and practicality of doing this would be impossible to do on a commercial scale. The picture below also demonstrates the torn leaves and why this would be impractical.



Figures 5 and 6 - Banana leaves in Carnarvon showing shredded leaves due to sea breezes.

Even if we could get the leaves, we would need to wash, sanitise and dry them using chlorinated water as food safety is a key factor for food producers in Australia. This would add to the cost and environmental impact with the additional use of water and electricity.

Labour costs including super, workers comp, superannuation and payroll tax is over \$28 an hour now. This process would increase the costs of packing bananas to a point where the cost of the packaging would be greater than the cost of the bananas.

In other parts of the world they don't have the same biosecurity regulations to protect their industries, bananas are grown in tropical areas with low wind speeds and high humidity, the leaves don't tear, and the cost of labour in other banana growing nations is a small fraction of ours, so I can see that it works in some other places. Wrapping in banana leaves, whilst looking beautiful, is just not practical in our climate or labour market.

Cliplocks



Bags are currently sealed using a "cliplock" plastic clip, and trials have been undertaken using fully compostable clips. Initial trials show these to be unsuitable as they break too easily when exposed to water/humidity. We continue to work on solutions to find a recyclable or compostable solution to seal bags.

Figure 7 Cliplocks made from compostable material. Shown warped and broken when exposed to moisture and pressure.



Sweeter Banana Bread

Summary

We have reduced our food waste from 60% to 4% through packaging. That is an incredible amount of food saved. There are many more carbon emissions in the production of food than in the packaging of it. To revert to high food waste to save plastic would be a travesty, given the valuable resources in growing food (water, land, labour and fertiliser)

Carnarvon Bananas make up less than 10% of the WA market and so are still a very niche product, the impact on plastic use if we change will be minimal (compared to addressing industries such as soft drink, snack food industry etc.)

However, if we stop growing bananas in Carnarvon and all bananas are shipped from Qld the environmental impact would be negative as more bananas would be consumed from regions that don't have the same environmental credentials in all other aspects of the production process.

In short removing packaging from bananas from Carnarvon would increase Australia's Carbon emissions and contribute more CO2 to the atmosphere and accelerate climate change. This would be an unintended consequence and not necessarily an improvement.

Adding costs would result in the growers making a loss. Bananas are still seen as a commodity and the price is set by the market, largely determined by the volume of bananas from Qld. If Banana volumes from Queensland continue to be high, the price is low and any additional costs incurred in packaging would not be recouped. We would revert to the same situation we were in before we began packaging. Resulting in the sale of bananas at below the cost of production. There is no guarantee that consumers would pay more for bananas because the packaging was now home compostable.

What can government do?

Analysis and Education

The first step in reducing single use plastics is to firstly pick the "low hanging fruit" i.e. Items where there is no benefit to packaging in plastic. Analyzing products where plastic improves shelf life and quality. An education campaign can be run to educate consumers that not all single use plastics are bad for the environment. Provided that these are disposed of correctly, they can have a positive impact in reducing food waste. We would argue that the reduction of food waste is more important than removing plastics from food, as the production of food creates more carbon emissions.



Sweeter Banana Bread

Redcycle – opportunities to create jobs and new products from soft plastics.



Figure 8 - Redcycle bin found in all Coles and Woolworths Stores

More promotion of Redcycle as the best way to dispose of soft scrunchable plastics would be of great benefit. This is the untold story of soft plastics. Not only are all of these soft plastics recyclable, but with a Redcycle Bin in every Coles and Woolworths store in Australia, Redcycle is accessible to most Australians. Even in remote regions here in Carnarvon we have Redcycle bins in our local supermarket.

There is a great deal of mis-education about soft plastics not being recyclable, when they are and in fact are one of the few products that are recycled in Australia.

The other benefit of Redcycle is that products made from the recycled plastic are also manufactured right here in Australia.

A company called Replas manufactures new products from the plastics – including signs, decking, outdoor furniture and bollards.

Investing in manufacturing in WA of decking, bollards, road base, and playground equipment, soft fall, outdoor fitness equipment, signs and all the other products that could be created with soft plastics would remove plastic from landfill, create jobs in Western Australia and remove plastics from the environment.

The WA Government could also support this by ensuring that furniture and bollards, roads etc. for projects developed by Government made use of these recycled materials.

<https://www.redcycle.net.au/>
<https://www.replas.com.au/>



Figure 9 Examples of manufactured products made from recycled soft plastics



Sweeter Banana Bread

Supply chain analysis

Government could support producers and manufacturers in reviewing the environmental sustainability of the supply chain so that the whole picture is presented. Whilst we use single use plastic packaging at a consumer facing level, it is still less packaging and soft plastics than that used for “loose bananas” and together with our low food miles, re-useable crates, low inputs, and environmentally sustainable ways of growing we are more sustainable and contribute less to Carbon emissions. Assistance with this supply chain analysis could provide businesses with pathways forward to address sustainability in the most appropriate ways that deliver the biggest impact.

Support producers who are seeking alternatives with R and D

Providing access to government staff who can assist with research, identify alternatives to plastic, grants to assist in R & D and finding alternatives will assist WA to become a more sustainable producer of goods and economic benefits that stem from successful businesses that create jobs and products.

For many small businesses like ours the R&D budgets of large corporations are out of reach, but by government supporting collaborative research into alternatives this could benefit all WA industry. The IP in these new age products is high and access to them is difficult and expensive for small WA businesses.

In particular encouraging manufacturers in WA to create new age sustainable compostable packaging in Western Australia, by linking with the existing European manufacturers, would assist in ensuring that the compostable plastics do not impact on the environment more than plastic, and reduce the cost of these products to levels closer to plastic prices. At 4-5 times the price consumers and producers are unlikely to wear the cost of these new age home compostable materials, and if they are imported from Europe the carbon emissions from freight would negate any benefit of less plastic in the environment.

I thank you for the opportunity to make a submission to this review, on behalf of the 30 farming families, the packing shed workers, truck drivers and ripeners who are all sustained by the production and consumption of bananas from our region.

Whilst our co-operative packs and markets around 50% of the industry, there are equal numbers outside our co-operative that pack into bags for the same reasons outlined above. Any blanket ban would impact on the lively hood of all of banana producers in Carnarvon, impacting on at last 50 farming families and their staff and supply chain partners.

Packaging has benefits and so does having affordable fresh produce that is locally grown. Any measures to punitively “ban” plastics needs to consider adverse impacts on all industry sectors and the availability and affordability of food, along with ensuring there are no unintended consequences such as food waste.

I have copied in Robin Chapple and Minister Alannah MacTiernan on this submission as I have spoken to staff in both of these MP’s offices in relation to this issue.



Sweeter Banana Bread

I invite you visit us in Carnarvon so you can see all of this for yourself, and we are happy to attend any meetings in Perth to further clarify understanding of this issue.

Please contact me if you have any questions or queries in relation to this matter and I look forward to your response and feedback.

Yours sincerely
Doriana Mangili
Business Manager
Sweeter Banana Co-Operative



Response to “Let’s not draw the short straw: Reduce single-use plastics” issues paper

Tetra Pak, the world's leading food processing and packaging solutions company, welcomes Western Australia’s initiative to address the environmental impacts of single-use plastics, and the opportunity to provide a submission on the April 2019 Issues Paper.

On 27 April 2018, Australia’s Environment Ministers announced a historic target to make 100 per cent of packaging in Australia reusable, recyclable or compostable by 2025 or earlier. As a company that operates in Australia, Tetra Pak aims to lead by example when it comes to deploying renewable materials, from sustainable sourcing to recycling.

Food packaging has an essential role to play in achieving the United Nations 2030 Sustainable Development Goals for “zero hunger, good health and well-being”. The UN goals set the framework and direction for governments and businesses alike, to provide safe food and nutrition to a growing population. We fundamentally believe that the packaging industry must help to meet these goals while reducing impact on the environment and consumption of natural resources.

In response to the issues paper, Tetra Pak offers the following recommendations to two specific issues:

1. Container deposit schemes (CDS); and
2. Contamination at materials recovery facilities (MRFs)

Mandatory deposits for beverage containers

Tetra Pak supports the inclusion of cartons in deposit-refund systems if supported by a business impact assessment and when the following conditions are met:

- **Mandatory requirements:** the deposit-refund system for beverage containers should be mandatory, not voluntary. This will ensure the system is fully financed, there are no free-riders and fair competition between brands and products.
- **Ownership of the system:** the most effective option is a system owned and operated by the beverage industry (fillers and packaging manufacturers) because industry can consider utilising existing logistic and supply chain networks for delivering packaged products. Each partner of the system should take part in the funding. If retailers own the collection process, we run the risk that retailers control the system and money and specify which materials they want to take-back.
- **Scope:** All beverage containers, **regardless of material composition** and regardless of the type of product should be included to maximise consumer participation and ensure a level-playing field;


- Historically, deposit-refund systems in place today have applied deposits to PET bottles, metal cans and glass bottles which contain carbonated soft drinks, water, beer and wine and spirits;
- Beverages which require barriers in the packaging (e.g. long-life milk and juices) to protect and keep products fresh are increasingly included in deposit-refund systems, to increase consumer participation and to ensure a level-playing field;
- As deposit schemes continue to be expanded and discussed in Australia, Tetra Pak also advocates for a harmonization of these schemes such that they can be effectively and efficiently implemented across the country.
- **Funding:** it should be transparent, with all funds retained to operate the system. Unredeemed deposits should remain within the scheme and used to offset programme costs; however, the scheme should not be designed to be reliant on unredeemed deposits since return rates are likely to rise, meaning that the funding from unredeemed deposits will fall.
- **Container recycling fees (differentiated fees vs. flat fee for all materials and products):** Where container return rates are high and operating costs exceed the off-setting revenue from sale of materials and the unredeemed deposits, the net cost of recycling should be differentiated by container type.
- **System design:** depot systems (non-retailer premises) should be considered since most retailers do not have the floor space or may not want to act as a collection point without significant financial support

In the case of container deposit schemes, Tetra Pak will ensure continued active engagement with the Western Australia government and system operators to secure a level-playing field for cartons and fair costs.

Contamination at Materials Recovery Facilities (MRFs)

Tetra Pak supports reducing contamination at MRFs as it is critical to making our recycling system effective and sustainable. At the same time, we believe that public policy and legislation should recognise that recycling packaging waste is a shared responsibility among government, consumers and the private sector.

- **National governments** set the conditions and responsibilities for each actor into legislation, provide adequate enforcement and measure progress as described above, based on traceable documentation.
- **Local authorities** secure separate collection of packaging wastes at source and ensure treatment and safe disposal of residual waste.
- **Consumers** separate waste at the source (e.g. at the household).
- **Producers of packaged goods** and **packaging manufacturers** should ensure recycling solutions are in place for the packaging they place on the market and participate in raising consumer awareness for recycling.



The path towards a solution to current challenges at the MRF with respect to contamination involves educating the public about properly separating their recyclables at the kerb, combined with improving personnel and technology that can more effectively separate materials at the MRF.

Conclusion

At Tetra Pak, we fundamentally believe that the principles of a circular economy are the preferred path forward to preserve the availability of natural resources for future generations. We appreciate this opportunity to provide input to the development of Western Australia's policy for single use plastics and seek continued engagement and partnership to advance this agenda.

12 July 2019

Submission by the Social Justice Commission of the Uniting Church Western Australia

Submission to the

Department of Water and Environmental Regulation's Consultation into
Reducing Single-use Plastics in Western Australia



Social Justice Commission

Uniting Church Western Australia

July 2019

Introduction

The Social Justice Commission of the Uniting Church in Australia, Synod of Western Australia (UCWA) welcomes the opportunity to make a submission Department of Water and Environmental Regulation's Consultation into Reducing Single-use Plastics in Western Australia.

The Uniting Church continues to reflect on its long standing commitment to social, environmental and intergenerational justice and views the threat of plastic pollution as an issue requiring urgent attention.

Motivation for Action

The Uniting Church in Australia is committed to social, environmental, and intergenerational justice, which is expressed in various Assembly documents and in the Synod of WA's own resolutions on the care of creation. The Uniting Church believes that the natural environment is not merely a resource for the benefit of human beings but has intrinsic value as part of God's good creation. The Church's commitment to the environment arises out of the Christian belief that God, as the Creator of the universe, calls us into a special relationship with the environment – a relationship of mutuality and interdependence which seeks the reconciliation of all creation with God. We believe that God's will for the earth is renewal and reconciliation, not destruction by human beings.

It is a sad truth that in our modern, civilised world, we have not kept the creation 'good'. With the increase of carbon dioxide from the burning of fossil fuels, we have changed the climate of our planet threatening the homelands of many people and the extinction of many animals. We also leave a trail of indestructible plastic garbage throughout the world. Right now, we have so many good reasons, as Christians and stewards of the planet, to live sustainably.

Addressing Plastic Pollution

The impact of plastics on the environment, particularly the marine ecosystems, is widely recognised to be highly significant. The 2014 CSIRO Marine Debris Report¹ found that approximately three-quarters of the rubbish along the Australian coastline was plastic. In some places the density of plastic in oceans ranges up to more than 40,000 pieces of plastic per square kilometre. Since debris is more highly concentrated around major cities, it is inferred that the majority of litter in Australian waters comes from Australian consumers and industries.²

At our last annual Synod meeting, the UCWA agreed to address this problem not only by looking at our own use of plastics but by requesting the State Government to commit to **phasing out all non-essential single-use plastics**.

The Synod wishes to congratulate the State Government on its successful implementation of the ban on single use plastic bags, but now urges that this important move be followed up with a ban that encompasses all non-essential single use plastic. We note with interest that the European Union has [recently agreed to a similar stance](#).

¹ <https://www.csiro.au/~media/OnA/Files/MarineDebris4ppFactsheet-PDF.pdf>

² <https://publications.csiro.au/rpr/pub?pid=csiro:EP147352>

We also acknowledge the McGowan Government's commitment to a container deposit scheme and look forward to its implementation in 2020.

It is the view of the Synod that the State Government also needs to model best practice in its own procurement standards by **phasing out the purchase of products made of synthetic fibres** (except where suitable and safe alternatives composed of natural fibres cannot be obtained). This is due to the unseen microfibers that are entering our waterways and marine ecosystems every time synthetic-based material is washed.

The Synod also wishes to see a ban on the manufacturing and sale of washable products containing microbeads and greater investment in promoting and expanding the local plastic recycling industry in Western Australia.

The UCWA sees the tightening of China's and other countries' recyclable material standards as an opportunity to develop more locally based solutions that save on shipping costs and carbon emissions, while also creating more local jobs. We acknowledge the review of WA's waste strategy currently being undertaken and request that the promotion and expansion of the local recycling industry be incorporated into that strategy.


Summary

The UCWA appreciates the opportunity to make this submission to the Consultation. It is our fundamental underlying belief that God calls us into a particular relationship with the creation – a relationship of mutuality and interdependence which seeks the reconciliation of all creation with God. It also makes good economic and political sense to ensure the long-term well-being of our natural world – there can be no security for humanity without a healthy ecosystem.

We therefore endorse strong action to address plastic pollution by the WA State Government.

For further information please contact:

Geoff Bice
Social Justice Consultant
Uniting Church in Western Australia
85-89 Edward St, Perth, WA, 6000
9260 9800



DEPARTMENT OF WATER AND ENVIRONMENTAL REGULATION.

Re: Community's ideas on changing behaviour to reduce single-use plastics and packaging.

Bunbury, 23/05/2019.

- Minimise the opportunities to give the community the option whether caring or not about the environment, this issue should not be "an option" but a duty to all of us.
- Raise awareness about the importance and **URGENCY** to take immediate and significant actions.
- Involve schools, teachers, big companies, corporate workers, housewives into being massive part of the solution from very young children to elderly.
- Promote the anti-plastic media massively through social media, documentaries, radio/TV etc. Community has to accept direct responsibility of their own waste.
- People have to understand that even our Australian cities and landscapes look spotless and beautiful, the plastic issue is a terrible menace for humanity – and very scary!

Plastic bags at the cashier, supermarkets and other shops:

Eliminating the gray-single-use bags and promoting reusable bags is excellent but not enough.

Plastic bags for packaging should be banned, no matter if they are reusable. Plastic is plastic! These strong-resistant "reusable" 15- cents bags should be **only a transition** and should be phased-out shortly. They will eventually end up in the bin anyway, maybe in less amount but will definitely cause even higher impact – **only** one plastic bag can cause unmeasurable damage. If the super wants to provide a better alternative, **replace** "reusable 15-cent plastic bags" with paper bags or empty boxes.

Plastic packaging for fruits & veggies:

This should be phased out asap. Consumers must take their own **reusable produce bags or buy loose** (especially big items). Some bags claim to be biodegradable but still take long time to do so, and during that time they cause preventable damage if never used in the first place.

Ban plastic in produce like sealed cucumbers for example, totally unnecessary.

Polystyrene (solid foam) must be banned from regular packaging too, replace with more eco-friendly materials.

Produce **pre-packaged in plastic bags is commonly cheaper** than bought loose. Very discouraging for the community to reduce plastic.

Soft plastics for packaging:

As soft plastics don't go in recycling bin they are disposed into the 'general rubbish'. However, some supermarkets have a "Soft plastic collection" community bin where we can pack and dispose our household soft plastic. Having said that, I want to highlight that unfortunately, in my whole social circle I only know ONE person that is doing this, and I have not seen ANY initiative for Soft plastic disposal in any shops, eateries or commercial buildings.

Industry & Corporate:

The fact of being ISO14000 certified is not guarantee that there's no room for improvement nor that there's not lack of environmental awareness.

Fast food / take away food:

Phase-out plastic packaging items and replace with sustainable eco-friendly materials (straws, cups, containers, bags).

I am sure, there must be many other initiatives around that must be heard and addressed promptly.

Thank you for your time and prompt actions! Hopefully we will all commit to work together for a more sustainable planet. We have no planet B.

Kind regards.

Vanessa Alonso





Department of Water and Environmental Regulation
Government of Western Australia
Prime House, 8 Davidson Terrace
Joondalup, WA 6027
Email: plastic-action@dwer.wa.gov.au

12 July 2019

Dear Sir/Madam

Re: Let's not draw the short straw

Thank you for the opportunity to submit feedback on the Department of Water and Environmental Regulation's *Let's not draw the short straw: reduce single-use plastics* issues paper.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the peak body for all stakeholders in the essential waste and resource recovery industry. We have more than 2,000 members representing over 500 individual entities nationally, operating in a broad range of business organisations, the three tiers of government, universities, and NGOs.

In WA, the projected value of the state's waste and recycling activity in 2017-18 is estimated to be \$1.4 billion. Total waste generation during that period is estimated to be 5.15 million tonnes, of which 2.73 million tonnes was disposed to landfill and 2.77 million tonnes recovered¹. This represents a marked improvement for the state, a trend that began in 2011.

The state government has continued to show its commitment to reducing waste and increasing recycling as seen in a range of initiatives including the 2018 ban on lightweight plastic bags and the proposed three-bin FOGO system for Perth and Peel by 2025. WMRR commends the government for progressing these initiatives and acknowledges its ongoing efforts in managing what remains a very challenging issue – the consumption and disposal of single-use plastics.

In reviewing the issues paper, WMRR acknowledges and supports DWER's emphasis on avoiding the creation of some of these materials as well as changing our habits to avoid using single-use plastics. WMRR also recognises the level of detail in the paper pertaining to the problems caused by single-use plastics, which will play an important role in the education piece.

While WMRR's submission below focuses on the options put forward in the paper, broadly, we support the use of regulation in eliminating single-use plastics as minimising the use of these materials will go towards reducing pollution, increasing reuse, and ideally, improving the quality of recovered recyclable materials.

Please do not hesitate to contact the undersigned if you'd like to discuss WMRR's submission.

Yours sincerely



Gayle Sloan
Chief Executive Officer
Waste Management and Resource Recovery Association of Australia

¹ Inside Waste Industry Report: volumes and values 2017-18

General comments	
<p>Barrier bags</p> <p>Degradable, biodegradable, and compostable bags</p> <p>(page 19)</p>	<p><i>Question 1: Are there alternatives to barrier bags that might be considered?</i></p> <p><i>Question 2: Do you support including degradable, biodegradable, and compostable products in any ban on single-use plastics.</i></p> <p>Firstly, WMRR advises caution in the promotion of alternatives as they seek to reinforce the values of a throw away society. Emphasis should be on avoidance, re-use and redesign.</p> <p>WMRR also agrees with the UN and DWER that biodegradable plastics do not readily break down in the natural environment and become microplastics when they break up, exacerbating the problem of plastics in the environment, and the use of biodegradable products does not decrease the volume of plastics entering the ocean.</p> <p>The ideal solution is to completely eliminate all these products, in addition to single-use plastic. However, until society reaches 100% avoidance and/or reuse, realistic solutions must be found, particularly as the use of barrier bags are part of a food business' obligations in accordance with the Australia New Zealand Food Standards Code.</p> <p>Thus, WMRR suggests the use of biodegradable plastics suitable for composting as an alternative (and as such, these plastics should not be part of the ban). These bags <u>must</u> meet Standards Australia's AS4736-2006 and be accompanied with composting infrastructure to be deposited in, including in public spaces.</p> <p>The roll-out and use of these bags must also be complemented by an ongoing education program and should be tied to the government's implementation of a three-bin FOGO system (ensuring there is an effective collection mechanism) to inform and educate the community about the proper methods of disposal of these bags, ensuring that they do not end up as contaminants in the kerbside recycling stream, in landfill where they will breakdown and produce greenhouse gases, or in our waterways.</p>
<p>Prioritising single-use plastics and actions</p> <p>(page 28)</p>	<p>WA should endeavour to prioritise and remove as many single-use plastic items as possible, particularly if there are readily available commercial alternatives.</p> <p>WMRR acknowledges that DWER has followed the EU's approach to first tackle ten (10) single-use items. WMRR encourages DWER to review the EU's list of problematic items and undertake an assessment to determine the applicability of a similar approach, particularly having regard to the work of WRAP UK and the <i>Roadmap to 2025</i>. There is also an opportunity for the WA government to work with other state governments (in particular SA) to facilitate a consistent approach towards single-use plastics, including the items that should be of focus.</p> <p>Additionally, DWER should investigate the pathway each material listed on page 28 takes through an audit of, as a start, mixed plastic waste collected at kerbside, to assist in determining priorities for action. Factors to consider include each material's recyclability, availability of viable end markets (and how to develop them), and renewability.</p>
<p>Options to reduce single use plastics – comments (pages 21-25)</p>	

<p>Voluntary reduction strategies</p>	<p><i>1. Sustainable product design</i> As noted above, WMRR strongly supports an emphasis on re-design to create products that are reusable and made of recycled content, moving away from the use of virgin, non-renewable resources and would draw the government’s attention to the recently released Ellen MacArthur Foundation’ “Reuse: Rethinking Packaging” Report.</p> <p>DWER points to APCO and its 2025 target as the way forward. However, WMRR has long held concerns that the co-regulatory approach is both limited and ineffective in driving the target of 100% of Australian packaging to be recyclable, compostable or reusable by 2025, and that 2025 is too far in the distance. The assumption that the packaging supply chain will voluntarily deliver against this target cannot be relied on based on historical evidence and experience. APCO’s current operating model is too limited a system to achieve the 2025 goal and in being voluntary, APCO is powerless to drive real change. What is needed is a mandatory extended producer responsibility scheme, which APCO in its current form, is not.</p> <p>As such, WMRR does not believe that there will be a “significant reduction of single-use plastic packaging going to landfill and into the environment” as noted by DWER, through APCO or any voluntary scheme.</p> <p>Instead, WMRR advocates for the strengthening of regulatory settings being the way forward, particularly for packaging where a strong product stewardship model must be adopted. This model must ensure that products, including packaging, is both redesigned and made from recycled content. After all, Australia has more than four million tonnes of packaging waste that can be, and needs to be, used as an input back into packaging.</p> <p><i>2. Voluntary agreements with businesses and industry</i> As DWER quite rightly points out, “these agreements are effective if implemented by all industry players”, but as noted above, voluntary arrangements are not an effective way forward as we cannot rely on the assumption that businesses and industry will voluntarily comply. What is required is government leadership and intervention. Additionally, voluntary agreements run the risk of free rider issues.</p> <p><i>3. Procurement procedures</i> WMRR advocates for sustainable procurement by government, including all levels of government and their agencies. Government should use its ability to develop long-term solutions for eliminating single-use items and lead the way by ensuring the use of recycled content in all government procurement as well as the development of specifications that include recycled content. This should also apply to sustainable packaging.</p> <p>WMRR also encourages DWER to consider establishing mandatory recycled content procurement targets for all government departments in relation to the recycled content of materials bought directly or provided by private contractors.</p>
<p>Community education and behavior change strategies</p>	<p><i>1. Education campaigns</i> <i>2. Behaviour change strategies</i></p>

	<p>These campaigns and strategies should not be developed and/or run in isolation and government needs to balance and complement these with appropriate intervention and regulation in the product design and manufacturing stage of the supply chain.</p> <p>Additionally, despite its cost, as highlighted by DWER in the paper, these are necessary initiatives. The focus of these campaigns should be on changing consumption behaviours (encouraging avoidance and reuse), as well as developing recycling habits that reduce the risk of contamination. Importantly, education and support are required to assist community in preferencing recycled content in packaging.</p>
Regulatory tools	<p>1. State-wide ban on the sale or supply of single-use plastics WA and importantly Australia, should follow in the footsteps of the EU, Taiwan and Canada and eliminate the use of problematic and unnecessary single-use plastics (and to do so within the next three years). Doing so will reduce the use of these products.</p> <p>However, consideration needs to be given to the items included (see comments above on 'prioritising single-use plastics and actions') and education and communication campaigns should place emphasis on avoidance, not just substitution.</p> <p>There may be a short-term economic impact for businesses as they source alternatives however, adequate communication and engagement will allow businesses to plan for the change.</p> <p>2. Levies and extended producer responsibility schemes It is vitally important that DWER thinks beyond traditional polluter-pays and extended producer responsibility (EPR) and considers what a true product stewardship and/or EPR program looks like – i.e. truly closing the loop and not simply being an effective collection system.</p> <p>Thus, as indicated above, WMRR supports strengthening the laws and frameworks around extended producer responsibility (EPR) nationally and moving to a mandatory scheme, which must include mandated percentages of Australian recycled content in products.</p> <p>WMRR encourages DWER to look to Europe to understand the approach taken by the new plastic economy work and what extended producer responsibility best practice looks like, and then clearly define WA's EPR approach for single-use plastics and provide further details in the next iteration of this paper.</p> <p>On levies, WMRR agrees that consumers may start to normalise the marginal additional costs in the long run and return to old consumption behaviours. However, a levy has a number of benefits, including generating revenue that could be reinvested in industry to fund recycling initiatives, and to build funds and incentives for businesses that are actively redesigning, reusing, and using locally produced recycled content in their products.</p> <p>3. Labelling requirements A label needs to solve two problems - it needs to tell consumers how they can dispose of the waste, which DWER has captured in the paper, and if the product is made from recycled product.</p>



	<p>APCO is pursuing a voluntary labelling approach and WMRR reiterates that a voluntary initiative is ineffective. A successful labelling scheme is one that requires compulsory participation of all product manufacturers.</p> <p>WMRR's view is that labelling needs to be developed, adopted and rolled out nationally to ensure consistency. Along with a recycling label, WMRR is calling for a national 'Made with Australian Recycled Content' label to allow consumers to preference goods made in Australia from the recycled material that is collected from them and to give the public choice and ability to assist growing Australian remanufacturing and jobs.</p> <p><i>4. Sustainable product design</i></p> <p>WMRR advises caution in the promotion of alternatives as they seek to reinforce the values of a throwaway society. Emphasis should be on avoidance, re-use and redesign.</p> <p>However, until society reaches 100% avoidance and/or reuse, realistic solutions must be found and WMRR suggests the use of biodegradable plastics suitable for composting as an alternative. These plastics <u>must</u> meet Standards Australia's AS4736-2006 and the government must do two things:</p> <ol style="list-style-type: none">1. Ensure that there is a system to collect, process, and utilise these materials, e.g. through a FOGO system.2. Develop and maintain long-term education programs that teach the community how to dispose of these materials appropriately to prevent contamination. <p>Again, the APCO target noted in this section is, in WMRR's opinion, neither sustainable nor workable for the reasons mentioned throughout this submission.</p>
--	---

Conclusion

WMRR acknowledges the government's commitment to eliminate single-use plastics in our environment and believes that this draft issues paper is a good first step in building a framework to tackle the challenge.

Key to DWER's success in eradicating (or as a start, reducing) the use of single-use plastics is a combination of options but the bulk of these must be backed by regulation. It is also important that DWER develops a robust process of tracking and enforcement to ensure delivery of outcomes.

Finally, but perhaps most importantly, any initiative, program and the like, needs to facilitate a transition to a true circular economy. This means that changing consumption behaviours must be a priority, alongside the use of locally made recycled products.





WASTE RECYCLING EDUCATION NETWORK

Perth, July 9, 2019

Reducing single-use plastics
Department of water and environmental regulation
Locked Bag 10
Joondalup DC, WA, 6919

Object: Written submission in regards to: Reduce single-use plastics – *Let`s not draw the short straw*, presented by the Waste Recycling Education Network (WREN).

This submission paper in regards to Reduce single-use plastics – *Let`s not draw the short straw* is presented by The Waste Recycling Education Network (WREN), which is an independent group consisting of community volunteers (residents) from the Southern Metropolitan Regional Council (SMRC) member councils (City of Fremantle, City of Melville, Town of East Fremantle, City of Kwinana).

The role of the WREN, which has existed since 2007 (formerly known as the Community Advisory Group), is to increase community understanding of the importance of waste avoidance, resource recovery and recycling and sustainable living; increase community understanding of the operations and programs of the SMRC; gather community feedback and suggestions to assist with education and decision making; and, proactively assist the SMRC to respond effectively to issues arising in the community and industry.

The WREN salutes and appreciates the opportunity put forward by the Waste Authority to provide comments on *single use plastics* and also salutes the initiative in itself. Finally, we hope these comments will be considered in regards to how to deal with these waste items.

This written submission consists of 9 specific single use items we believe should be dealt with and the preferred options on how to deal with them. Most of the items were chosen based on the fact that they currently cannot be recycled at the Regional Resource Recovery facility operated by the SMRC or because they contaminate the composting and recycling process at the facility and hence the end products.

Chairperson:

[REDACTED]
[REDACTED]

Postal Address:

Isabelle Gagnon and writer of the submission

[REDACTED]
[REDACTED]

WREN, PO Box 1501, Booragoon, WA, 6954, smrc@smrc.com.au

Here are the 9 items and options for reduction we recommend :

1. Barrier / produce bags

- A fee should apply on each bag used, to discourage customers from using them and avoid wasteful usage (one tomato per bag).
- An alternative (sale of reusable options such as ONYA bags) should be provided near the points of usage in the fruit and vegetable section. Customers should also be allowed to bring their own clean containers and a scale should be provided for bulk items.
- State-wide education campaign targeting the myth that these bags keep the produce clean while in fact with or without a bag fruits and vegetables need to be washed before consumption. The education campaign should also provide tricks to help people remember to bring and use their reusables.
- A state-wide ban on the sale or supply should be introduced after a period of time where customers have had time to equip and prepare themselves for reusable options. Ban exclusion should apply to few exceptions such as wet produces.

2. Cling wrap

- State-wide education campaign on alternatives to use at home (re-usable containers, plate or bowl turned on top of the other, beeswax wraps, etc) and information about the fact that this material cannot be recycled or re-used without difficulty.
- A levy due to the difficulty/impossibility of recycling this material.
- Appropriate labelling on what to do with this material after use (non-recyclable).

3. Nappies and wet or baby wipes

- Aggressive education campaign on the real costs and how to use re-usable nappies, targeting pre-natal courses, new mother`s groups, etc
- Financial incentives for re-usable nappies where new mothers receive a lump sum or discount toward the purchase of a set of re-usable nappies.
- Appropriate labelling on what to do with this material after use as both items are non-compostable and non-flushable.
- A levy due to the difficulty/impossibility of recycling this material (both items). For the nappies, the levy should be introduced at the same time as the lump sum or discount for re-usable nappies to encourage parents to switch to reusable nappies.

4. Tetrapack containers

- A levy due to the difficulty/impossibility to recycle this material and to encourage producers to work on a sustainable product design.
- Appropriate labelling on what to do with this material after use (non-recyclable).
- Reinforce procurement directive to governmental and public organisations (schools, hospitals, etc) to reduce the purchase of this item.

5. Individual pouches (yogourt)

- A levy due to the difficulty/impossibility of recycling this material and to encourage producers to work on a sustainable product design.
- Appropriate labelling on what to do with this material after use (non-recyclable).
- Reinforce procurement directive to governmental and public organisations (schools, hospitals, etc) to reduce the purchase of this item.
- A state-wide ban of this product should be considered due to the difficulty or impossibility of recycling this product and the contamination it causes when put in the wrong bin.

6. Meat trays

- The rigid container should be re-introduced into kerbside recycling collection as it represents a significant amount of plastic destined to landfill if not recycled.
- Before re-introduction to the recycling bin, a state-wide education campaign on what to do with the different components of the meat trays (completely remove soft plastic pellicule and dispose along with the absorbent, rinse and recycle the rigid tray).
- Appropriate labelling on what to do with the different components of this item after use, in conformity with the education campaign.
- Incentives to the producers for a sustainable product design that is completely recyclable, at least significant portion of it such as the rigid tray.

7. Thicker plastic bags

- A significant fee should apply on each bag to discourage customers from using them.
- An alternative option (sale of reusable options) should be provided near the points of usage. Avoiding any single-use type of bag such as paper.

- State-wide education campaign on the difficulty/impossibility of recycling this item. The education campaign should also provide tricks to help people remember to bring and use their reusables.
 - A state-wide ban on the sale or supply should be introduced after a period of time where customers have had time to equip and prepare themselves for reusable options.
8. Cigarette butts / filters
- A country-wide ban on filters made of plastic with severe penalties to the non-complying producers.
 - A nation-wide education campaign to explain the reason for the ban to the population and how to dispose appropriately of cigarette butts to avoid contamination of recycled material (not in a drink bottle or can even if made of non-plastic material).
9. Plastic beverage containers including lids
- A country-wide levy on virgin plastics to incentivize producers to use recycled plastic in the production of new containers and lids.
 - A mandatory significant recycled content in all containers and lids produced and sold in Australia, including containers made of aluminum and glass.
 - Onshore recycling facility here in WA and across Australia to process used containers into new ones for the same purpose. The same should be done with all plastic containers (food and non-food).
 - Incentives to the producer for a sustainable product design that is completely recyclable including a tethered lid to allow recovery and recycling not only of the container but the lid.

We thank you for taking the time to read our comments in regards to the reduction of single-use plastic items and the options we believe should be put in place to tackle effectively plastic waste pollution. Please, do not hesitate in contacting us if you have any questions.

Kind regards,

Isabelle Gagnon,
Chairperson, WREN

Submission on DWER Lets Not Draw the Short Straw Single Use Plastics Issues Paper



June 2019

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission therefore represents the consolidated view of Western Australia Local Government. However, individual Local Governments and Regional Councils may have views that differ from the positions taken here.

This Submission was considered and endorsed by the Municipal Waste Advisory Council on Wednesday 26 June.

1. Introduction

The Association appreciates the opportunity to comment on the State Government Issues Paper *Let's not draw the short straw reduce single-use plastics* and commends the Government for engaging in public discussion and debate on this issue. Local Government has a strong interest in single use plastics from a number of perspectives, as a community representative, service provider and regulator. Single-use refers to products – often plastic – that are 'made to be used once only' before disposal¹.

As a community representative, Local Government has supported the ban on single use plastic bags. Some Councils have also adopted policies to ban the release of helium balloons on Local Government land and the use of single use plastics at Local Government events, in Local Government operations along with smoking on public beaches. As a service provider, Local Government frequently has to deal with the impacts of single use plastic in its operations. As identified in the Issues Paper, this includes impacts at landfill facilities, Material Recovery Facilities, compost facilities and waste water treatment facilities. In addressing single use plastics, Local Government also has a role as a regulator and can issue infringements for litter.

This Submission provides comment on the scope of plastics and priorities for action identified in the Issues Paper, as well as the various approaches that can be taken to reduce single use plastics.

2. Scope of Plastics and Priorities for Action

There are a variety of ways that products can be selected and prioritised for action. Tonnage or volume is frequently used in Waste Management as a way of measuring outcomes. However, this may not be an appropriate measure for single use plastics, as they can be low in tonnage and/or small in volume. Data from the National Litter Index and the Tangaroa Blue Foundation indicates that cigarette butts are a frequently littered item, but only contribute a small amount to overall tonnages of litter. If a tonnage based approach is used, then the highest priority is likely to be packaged products, as these items are consumed at high rates. The information collected by Tangaroa Blue through the Indian Ocean Territories Marine Debris Project (which includes the Shires of Cocos (Keeling) and Christmas Islands) indicates that there is strong need to focus not only on material which is generated in Australia and becomes marine debris, but also material that is generated in other countries. The

¹ 'Single-use': Term used to refer to throw away plastic named Collins word of the year 2018 (2018). Available online <https://www.thejournal.ie/single-use-plastic-4327219-Nov2018/>.

information collected through the Marine Debris Project indicates much of the material washed up on the beaches of the Shires of Cocos (Keeling) and Christmas Islands originates in Indonesia. To address this issues, international action will be needed. The impact of marine debris has also been identified in the Northern Territory where direct engagement with the Indonesian Consulate has occurred².

Recommendation: That the State Government works with other State and Territory Governments and the Federal Government to influence plastic reduction and avoidance initiatives in other countries.

A Circular Economy based approach could also be used to determine priorities for action. This would involve focusing on whether a product is made from renewable materials and is readily recyclable. In this context, recyclability is defined as having an effective collection system in place (that is easy and convenient for consumers), with viable end markets for any collected material. Where products do not meet the criteria for recyclability and are not renewable, they should be phased out using a combination of the approaches identified in Section 3 of this Submission.

Additional research is required to determine if the range of products that are currently collected through the kerbside recycling system are recyclable. Plastic can contaminate the glass and paper streams processed by Material Recovery Facilities. As a material in its own right, there are currently limited viable markets outlets for mixed plastics, given the implications of China's National Sword Program. It is suggested that the DWER funds an audit of the mixed plastic stream processed by Material Recovery Facilities to identify materials that are problematic to recycle.

Recommendation: DWER funds an audit of the mixed plastic stream processed by Material Recovery Facilities to identify materials that are problematic to recycle.

In addition to the products listed in the Issues Paper, the Association would also like to suggest that nappies are included. These products frequently contaminate the material collected through the kerbside recycling system, contain non-renewable resources (plastic) and produce methane if landfilled. Additional research is required to determine why nappies are placed in recycling bins and what effective interventions could be used to reduce the generation of nappies (for example, encouraging the use of reusable options).

Recommendation: Nappies are included on the list of single use plastic items, with options to reduce the generation of this product prioritised.

3. Approaches to Reducing Single Use Plastics

The Waste Avoidance and Resource Recovery Strategy 2030 uses a combination of approaches to address the various issues identified in the Strategy, including:

- Knowledge
- Enabling infrastructure
- Incentives.

Based on the social practice theory, this approach provides an effective way to address complex issues. Appendix 1 of this Submission provides some management options that could be used to address the products listed in the Issues Paper, including:

- Legislation
- Engagement
- Infrastructure
- Operational
- Policy.

² ABC News (2019) Northern Territory luxury retreat at risk of being swamped by tides of toxic trash. Available online <https://www.abc.net.au/news/2019-06-16/bremer-island-plastic-pollution-worsens-turtles-tourism-issues/11178050>.

Recommendation: That the DWER uses a combination of approaches to address the issue of single use plastics.

The Issues Paper identifies a range of options that could be used to take action on single use plastics, along with the positive outcomes and examples of limitations of each option. Table 1 provides some commentary on these options and the situations in which they can be used.

Table 1: Policy interventions for reducing single use plastics.

Options to reduce single use plastics		Comment
Voluntary Reduction Strategies	Sustainable product design	<p>The approach of ensuring that products are designed for recyclability and minimize the use of non-renewable resources is strongly supported. As an entirely voluntary approach is not likely to be effective, the use of legislation to deliver sustainable product design is supported.</p> <p>WALGA has previously expressed concerns about the voluntary approach used by the Australian Packaging Covenant. A recent Submission on the APCO Towards 2025 Discussion Paper highlighted:</p> <p><i>Limited improvement and impact on Packaging Design - The Covenant aims to have an impact on packaging design, to make packaging more sustainable. However, aside from a few case studies, there is no clear sector wide data to demonstrate that this is the case. Feedback from a number of companies, gathered from responses to complaints lodged by WALGA, indicated that the main driver in designing packaging, was to make packaging attractive to consumers. Research undertaken by the Covenant indicates packaging is moving towards lighter weight plastics and composite packaging – both of which are difficult to recycle in many areas. There is no consistent labelling as to the general recyclability of packaging and attempts to introduce this through the Covenant have failed.</i></p>
	Voluntary agreements with business and industry	<p>WALGA has concerns with how voluntary agreements (such as certain Product Stewardship Schemes) have been progressed. These concerns were documented most recently in the Association’s Submission on the Review of the Product Stewardship Act. Any approach where the agreement of multiple parties is required to move forward can be difficult to manage and deliver undesirable outcomes.</p>
	Procurement procedures	<p>When the Government sets an example on how to practically avoid and reduce the use of single use plastics, a positive message is delivered to both the community and Local Government. However, this must be complemented by the provision of clear guidance for Government agencies on acceptable alternatives.</p>
Community education and behaviour change	Education campaigns	<p>Education campaigns are essential to ensure the community is aware of the need to act on single use plastics. Behaviour change strategies such as Plastic Free July, assist the community with making change at an individual level. However, education campaigns should not be used in isolation. In many cases, Government intervention is required to change systems and influence what products are put onto the market.</p>
	Behaviour change strategies	
Regulatory Tools	State-wide ban on the sale or supply of single use plastics	<p>A ban on the sale of certain single use plastic items could assist with a reduction in the use of these products. The Association and Local Government supported the ban on single use plastic bags. However, the Submission on the Single Use Plastic Bag Ban highlighted the need for the Government to monitor what products were used by retailers in place of light weight plastic bags and to intervene if there was a shift to heavier weight plastic bags. As retailers have shifted to</p>

		heavier weight plastic bags, it is suggested that any future state-wide ban on the sale of single use plastics should include a waste avoidance component, rather than simply encouraging product substitution.
	Levies	The Association agrees that a Levy which marginally increases the price of a product is unlikely to change behaviour in the long term as people will factor in additional costs. However, a Levy that is structured to preference certain approaches may be more effective. For example, the Sugar Tax in the UK was structured to tax drinks with a high sugar content at a higher rate. This encouraged companies to voluntarily reduce the amount of sugar in all but their 'iconic' products – reducing the overall amount of sugar in the majority of beverages. If a packaging levy similar to that of the Green Dot scheme in Germany was introduced, products that are not renewable and/or difficult to recycle would be charged at a higher rate. This would provide companies with a financial incentive to change packaging over time. In addition, the Levy would generate a revenue stream that could be used to fund recycling initiatives.
	Extended producer responsibility schemes/ Product Stewardship	<p>The Association would like to highlight that the section on 'Levies and extended producer responsibility schemes' should be amended/enhanced and the definition of extended producer responsibility amended. Product Stewardship and Extended Producer Responsibility are specifically included in the Waste Avoidance and Resource Recovery Act. Both approaches require the producer of a product to take responsibility for their product (physical or financial) at end-of-life. The Issues Paper does not fully explore the range of options that are available using EPR or Product Stewardship approaches.</p> <p>The limitations section on 'levies and extended producer responsibility schemes' contains a comment that there can be large administrative overheads for government to manage the implementation and ongoing effectiveness of a levy. This assumes that Government will be managing a levy. However, it is worth noting that most Product Stewardship Schemes in Australia (with the exception of Used Oil) are managed by the industry and are not a responsibility of Government.</p>
	Labelling requirements	A voluntary labelling approach is currently being pursued nationally through the Australasian Packaging Label. Any labelling scheme needs to be compulsory to encourage all producers to participate within a reasonable timeframe.
	Sustainable product design	WALGA has previously expressed concern through the Submission on the APCO Towards 2025 Discussion Paper that product substitution must be carefully managed. This is a particularly relevant concern for biodegradable / compostable plastics, as it is difficult for existing processors to distinguish between these materials and traditional plastics. If disposed of through the kerbside recycling system, would these materials would be classed as contaminants. In landfill, these materials will break down and produce greenhouse gases. For product substitution to be effective, a system needs to be in place to collect, process and utilise any material that is produced (e.g. Food Organic Garden Organic (FOGO)).
Additional Regulatory Tools	Increasing fines / enforcement activities	Additional regulatory tools are available to Government, and should be utilised as part of a collective approach to reduce the impact of single use plastics. Adopting a whole of Government approach to this issue could include encouraging Police Officers to issue fines for littering – as has occurred previously.

Recommendation: That the DWER:

- **Further explore the options for Extended Producer Responsibility and Product Stewardship under the WARR Act**
- **Ensure increased fines and enforcement activities are included as a strategy to reduce the impact of single use plastic.**

4. Conclusion

The Association commends the Government for progressing initiatives to reduce single use plastics. In developing interventions for these materials, a range of approaches will be needed that encompasses voluntary measures, community engagement and is underpinned by regulatory action. The example provided in the Issues Paper where microbeads were successfully phased out in personal care products provides a good example of how a voluntary approach that is backed by a commitment to regulate can deliver change.

To achieve a Circular Economy, there is a need to change how we approach consumption and ensure that no product is placed onto the market unless it comes from a renewable source and there is a clear and easy pathway for that product to be recycled or recovered. Effective Product Stewardship / Extended Producer Responsibility Schemes are one way to achieve this outcome, ensuring producers take either physical or financial responsibility for their products at end-of-life.

Appendix 1: Material Type, Issue and Management Options

Material	Issue	Management options
Balloons	Litter issue	<p>Legislation - Ban mass release of helium balloons, as per NSW legislation.</p> <p>Engagement - Engage the party industry and other users of balloons to discuss alternative options. For example http://www.theballooncouncil.org/.</p> <p>Comment: some Local Governments have already banned the release of helium balloons on Local Government land. A statewide ban would be a more efficient approach. WALGA developed a Paper on Helium Balloon Litter which includes some options that Local Government can take to avoid the release of Helium Balloons.</p>
Fishing gear	Litter issue	<p>Infrastructure - Managed through the provision of bins in key locations.</p> <p>Engagement - Engage fishing groups/through outlets selling the material, promote responsible fishing programs.</p> <p>Enforcement - Fines for those littering material.</p> <p>Comment – there are existing programs in place such as Keep Australia Beautiful Clean Marine which could be enhanced. The remote nature of some fishing locations may make enforcement more difficult.</p>
Barrier bags Lightweight plastic bags Thicker plastic bags	Landfill - these materials have the potential to become windblown litter	Infrastructure/Operational - Install litter fences and undertake regular 'emu picks' of windblown material.
	Recycling - flexible plastics contaminate the mixed fibre stream and impact end markets. Recycling tied up in plastic bags is a frequent contamination issue	<p>Operational - MRF's currently address this issue by reducing the speed of processing to allow plastics and other contaminants to be removed by hand. This approach requires additional staff and increases the amount of residual waste produced.</p> <p>Engagement - Distribute consistent messages that flexible plastics are not to be placed in the recycling bin.</p> <p>Infrastructure - To remove plastic from the paper stream at MRF's, optical sorters are required (\$4-5M). There is also an option to install additional drop off locations for the community.</p>
	Compost – contamination issue	<p>Operational - Processors currently address this issue by installing pre-sort infrastructure and reducing the speed of processing to allow contaminants to be removed by hand. This approach requires additional staff and increases the amount of residual waste produced.</p> <p>Engagement - Distribute consistent messages that flexible plastics are not to be placed in the FOGO/GO bin.</p>
Bunting for elections	Litter issue	<p>Comment – As found in various High Court rulings there cannot be restrictions placed on implied Constitutional freedom of political communication. Suggested approach is that the scope be changed to the material type to plastic bunting used for any purpose.</p> <p>Legislation: Ban the use of plastic bunting for advertising.</p>

Cutlery, plates, stirrers Drinking Straws	Recycling - smaller items end up as contamination in the glass stream	Infrastructure - Undertake further sorting of the material. Policy - Ban materials and require products to be recyclable, reusable or compostable.
	Compost - contamination issue	
Prepacked fruit and vegetable Plastic packaging (non-food)	Recycling - material can be contaminated with food and the items may not be recyclable.	Policy - Composite packaging affects product quality. All packaging should be designed for recycling. Large scale uptake of the Australasian Recycling Label is also required to ensure the community knows what is / is not recyclable through the kerbside system. Engagement - Distribute consistent messages regarding correct disposal/recycling.
Lightweight food containers Plastic beverage containers	Recycling - material can be contaminated with food / drinks.	Infrastructure - Currently there are viable market for PET and HDPE. However, current market realities present an urgent case for the development of processing facilities in WA/Australia. Engagement - Distribute consistent messages regarding correct disposal/recycling.
Polystyrene	Landfill / Recycling – becomes windblown litter at landfills, and is a contaminant in the recycling system	Policy - Phase out polystyrene in packaging. Infrastructure - Polystyrene is problematic as it is a large volume but light weight material. Some Local Governments have established separate collection systems for this material at landfill sites that is sent for recycling. Engagement - Encourage residents/business to source separate polystyrene and take it to dedicated collection sites.
Cigarette butts/ filters	Litter issue	Infrastructure - A number of Gamification options can be used to reduce cigarette butt litter. Research from Terracycle also indicates that people are less likely to litter their cigarette butts if the butts are being recycled (i.e. if bins indicate 'recycle your butts here'). Engagement - Continue to deliver anti-smoking initiatives.
Cotton buds / sticks	Compost - contamination issue	Policy - If FOGO systems are established on a broad scale, there is an option to substitute this product with a compostable product. However, there must be prior engagement with processors, to determine if processing systems would still classify this material as a contaminant.
Sanitary wipes/ towels	Compost - significant contamination issue	Policy - If FOGO systems are established on a broad scale, there is an option to substitute this product with a compostable product. However, there must be prior engagement with processors, to determine if processing systems would still classify this material as a contaminant.
Takeaway coffee cups / lids.	Recycling - contaminant in the paper/cardboard recycling stream – also the shape is difficult for existing processing equipment to separate	Policy - If FOGO systems are established on a broad scale, there is an option to substitute this product with a compostable product. However, there must be prior engagement with processors, to determine if processing systems would still classify this material as a contaminant.
Microbeads	Litter issue and issue for Waste water treatment facilities	Policy - Significant progress has been made at a national level to voluntarily phase out microbeads in personal care products. This was backed by a commitment to regulate. This approach could be replicated for other products containing microbeads.



**Western
Metropolitan
Regional Council**

Managing waste wisely

40 Marine Parade, Cottesloe WA 6011

PO Box 47, Mosman Park WA 6912

T 08 9384 4003 F 08 9384 7511 E admin@wmrc.wa.gov.au

www.wmrc.wa.gov.au

WMRC Submission on Let's Not Draw the Short Straw Issues Paper

Status of this Submission

This submission has been created following review of WALGA's submission on this paper prepared through MWAC and following consultation with WMRC Member Council staff and Elected Members. It is presented as a consolidated submission by WMRC and its five Member Councils (City of Subiaco, Towns of Claremont, Cottesloe and Mosman Park and the Shire of Peppermint Grove). Given the constraints of WMRC meeting schedules, it has not yet been approved by the WMRC Council; however, DWER will be notified if there are any changes following the next WMRC Ordinary Council Meeting on 1st August.

Commentary on WALGA's submission

The WMRC agrees with the points made in the WALGA submission and the recommendations it contains. In particular, the WMRC recommends the deployment of a suite of measures in dealing with single use plastic items to avoid the unintended consequences that may flow from the use of just one measure. For example, the 2018 lightweight plastic bag ban has had the unintended consequence of generating much wider use of heavier-weight plastic bags which are finding their way into the litter and waste management streams. Had the ban been coupled with further use of other options (eg voluntary agreements with business and industry and/or a levy/EPR scheme) this unintended consequence could have been minimised.

WMRC-based information on resident attitudes

A recent resident survey undertaken by the WMRC indicated a high level of public support for responsible waste management (97% support). When asked, they 96% agreed that they try to minimise their waste but only 52% find it easy to do so. Unprompted, eliminating plastic is one of the top 3 topics that residents wish to learn about in waste education material. This suggests a high level of public support for any actions to reduce single-use plastics.

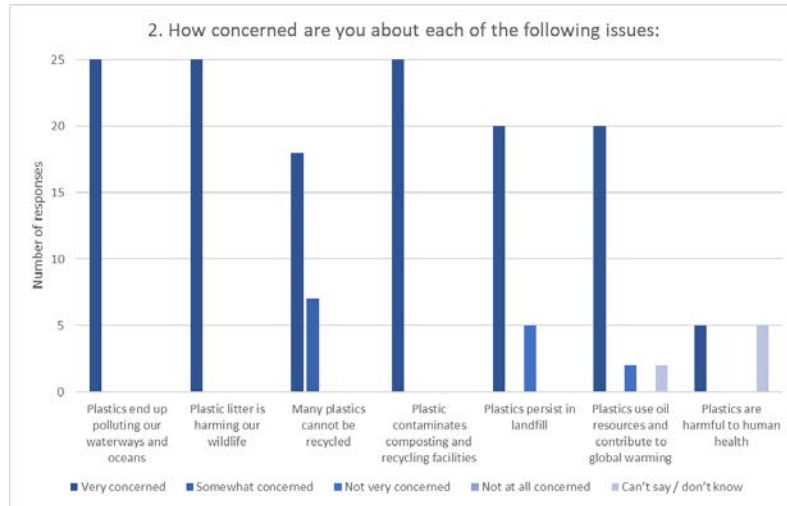
Commentary following WMRC's consultation on the Single Use Plastic issues paper

Consultation on the issues paper was undertaken with attendees at a WMRC-organised Plastic Free July morning tea for Member Council Staff and elected members. There were 22 people present representing most WMRC Member Councils and including Elected Members and staff. Attendees were invited to complete the DWER survey from the 'Let's Not Draw the Short Straw Issues Paper' in groups of 4-6, and the results compiled. Key points are listed below as responses to the five questions asked.

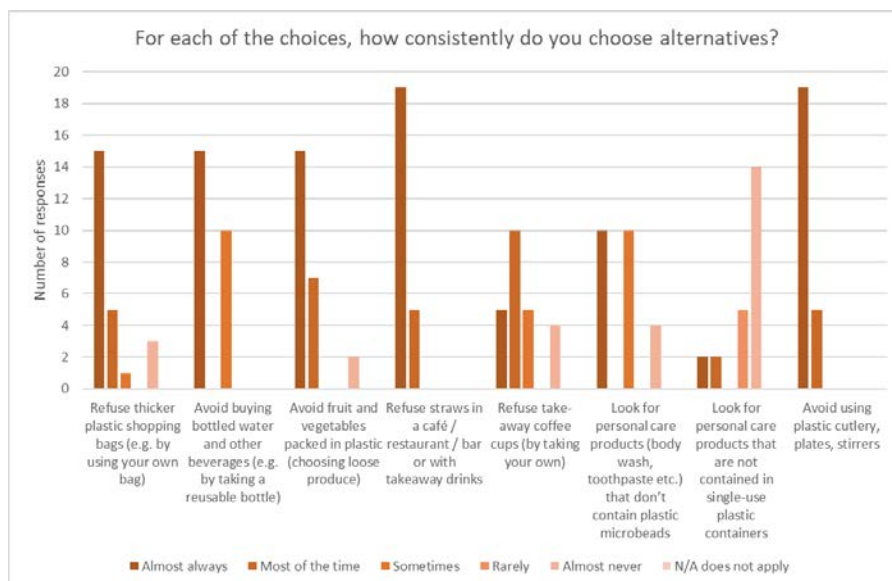
WMRC Member Councils

Town of Claremont | Town of Cottesloe | Town of Mosman Park | City of Subiaco | Shire of Peppermint Grove

1. All attendees support reduction of the amount of single-use plastics consumed
2. Concern was very high for all types of plastic with the following three items ranking universally as 'very concerned'
 - Plastic ends up polluting our waterways and oceans
 - Plastic litter is harming our wildlife
 - Plastic contaminates composting and recycling facilities



3. Attendees reported frequently choosing alternatives to single-use plastics with the following as the most consistent:
 - Refusing straws
 - Avoiding plastic cutlery etc
- And the following as the least consistent:
- Refusing take-away coffee cups
 - Looking for personal care products without microbeads
 - Looking for personal care products not contained in single use plastic containers



4. The following items ranked in 4 or 5 of the 5 groups' top 10 items requiring additional action:

- Plastic packaging
- Pre-packaged fruit and vegetables
- Takeaway coffee cups/lids
- Wet or baby wipes
- Cigarette butts/filters
- Drinking straws

5. Of the options to reduce impacts, the most frequently chosen were:

- Education campaigns/behaviour change strategies
- State-wide bans on the sale or supply

The least frequently chosen were:

- Procurement procedures
- Levies and EPR schemes
- Labelling requirements

There was however little agreement on the most effective measures for any of the items suggesting that a combination of measures for specific items will be acceptable:

	Sustainable product design	Voluntary agreement with business and industry	Procurement procedures	Education campaigns/behavior change strategies	State-wide ban on the sale or supply	Levies and extended producer responsibility schemes	Labelling requirements
Balloon releases							
Balloons							
Barrier produce bags							
Cigarette butts / filters							
Cotton buds with plastic shafts							
Cutlery, plates, stirrers							
Drinking straws							
Fishing gear							
Lightweight plastic bags							
Plastic beverage containers							
Plastic packaging							
Polystyrene							
Prepacked fruit and vegetables							
Takeaway coffee cups / lids							
Takeaway food containers							
Thicker plastic bags							
Wet or baby wipes							

These findings can be summarised as indicating that State Government regulatory action on plastic packaging and restrictions to the sale of plastic items for which there are viable non-plastic alternatives (eg straws, wipes, balloons/releases) could be successful in combination with relevant education campaigns and promotion of sustainable product design. It is to be noted that the responsibility for this last measure lies beyond the aegis of the DWER.

Recommendations

- 1. That DWER act on reducing the use of single-use plastics.**
- 2. That any intervention by DWER combine different types of measures (regulatory, educational, infrastructure) to build a robust response to reducing single-use plastics.**
- 3. That DWER engage with other State Government departments to promote more sustainable product design**

From: [Winsor Morris](#)
To: [Plastic Action](#)
Subject: Single Use Plastics
Date: Monday, 10 June 2019 6:21:12 AM

Hi, I often work in the mining industry and find 2 blatant overuses of single use plastic on a daily basis.

1 - Thousands of workers on mine sites across the country are breath tested every day for alcohol. In my experience, the plastic breathing

tube is always used, even though most breathalyser units have a "passive " test function which enables the test to be performed without

the tube.

2 - Again, thousands of workers on sites across the country, take lunch / smoko food to work from their camps.

Every site I have been to supplies disposable plastic containers for the workers to take their food in, along with plastic cutlery and bags.

My estimate would be an average of 2 to 3 containers per worker per day.

20,000 workers may be a conservative estimate ?

60,000 containers every day ?

This is shameful and easily avoidable.

Thanks and good luck !

Winsor

From: [Stuart Kull](#)
To: [Plastic Action](#)
Cc: [Mark Wright](#); [Craig Lovett](#)
Subject: Attn: Joanne O'Conner please.
Date: Friday, 5 July 2019 3:17:28 PM
Attachments: [image001.png](#)
[WISE - Presentation May 2019.pdf](#)

Hi Joanne,

It was great to chat on the phone this afternoon.

Here is a short video explaining what we do, and why.

https://www.youtube.com/watch?v=liiKM_qwml8&t=61s

It's be great if you could share this amongst your team, and eventually also with the minister.

I have put Mark Wright in cc. As I mentioned on the phone, Mark was in Perth 2 weeks ago and met with the senior management at the 4 major venues in Perth.

Mark can best answer your questions in relation to who he met and what was discussed.

I look forward to remaining in contact with you and your team., and working to ELIMINATE all single-use plastic beer, wine and champagne cups for all events in WA in the next years.

Have a wonderful weekend,

Keep up the great work.

Stuart.

Stuart Kull

Operations Manager

WISE – It's in your hands

Suite 101, Level 1 | 441 Docklands Drive | Docklands VIC 3008

t: +61 3 9629 1544 | [REDACTED]

| w: <http://www.itsinyourhands.com.au>



Wise

It's in your hands

"Fighting the war on waste"

WISE - It's in Your Hands

The WISE solution is a game changer via:

- Ecologically sustainable
- Reduced cleaning costs
- Elimination of single use plastic waste to landfill
- Reduced waste management
- Reduced reliance on labour
- Increased revenue
- Develop community support platforms without cost to venues
- Increase identity of special events
- Provide a 'Brand-in-Hand' advertising medium for product, event or activation

WISE Organisational Structure

WISE is the coming together of three global entrepreneurs to create a new and exciting strategic alliance in Australia.

- **Craig Lovett** – Co founder and CEO of WISE. The WISE day-to-day operations, client management and service delivery will be run out of Craig's Incognitus office in the Docklands in Melbourne. Incognitus is a global leader in the arena of operational readiness and sustainable management of major sporting events on the world stage.
- **Stuart Kull** – Co founder and COO of WISE. Stuart is a global entrepreneur and the architect of the WISE partnership. With his experience in designing and operating just-in-time logistics facilities throughout the world, Stuart will ensure that we deliver a seamless service to all WISE clients.
- **Mark Wright** - Business Development Manager. Mark is a stadia catering professional and brings to WISE and our clients his specialist insight on business development, marketing, sales and logistics services, through his global experience in the leisure, sport and event industry.

Savings & Income

SAVINGS

- No requirement to purchase single use PET cups.
- Post event clean, as no requirement for cleaners to pick up all of the used cups.
- Reduction in landfill costs, due to cups being re-used.

INCOME

- % revenue share with WISE and the SCG

Charitable Solutions

In our experience, we have found the best solution is to work with the Salvation Army, as they are the experts in collection of charitable donations. They will work in conjunction with the representatives from your charity of choice. The 2 charities would split all donations 50/50.



Elimination of
single use
plastic cups to
landfill



For every 100,000 WISE cups used, this will eliminate the equivalent of 354 wheelie bins (120 Litre) going to landfill.

Media

Video of what we do and why.....

<https://www.youtube.com/watch?v=day-BCkpLac>

Links below to recent media reports.

<https://www.ausleisure.com.au/news/plastic-drinking-cups-removed-from-sydney-showground/>

<https://www.triplem.com.au/story/rip-beer-snake-plastic-cups-to-be-banned-from-sydney-showground-131926>

https://www.rugbyau.com/news/2019/03/18/eco-cups-huge-success-at-2019-hsbc-sydney-7s?fbclid=IwAR21Rlo2oB1A_tnMHvXIJEKnofCQtrEuayYvcpq-iT-kjIU_6pziph_0UjY

WISE How it works - Logistics



WISE How it works - Patron

- The system works by the patron paying an additional \$2 deposit with their first drink
- They then receive unlimited free exchange cups throughout the event day.

At the end of the event day the consumer has 3 x options:

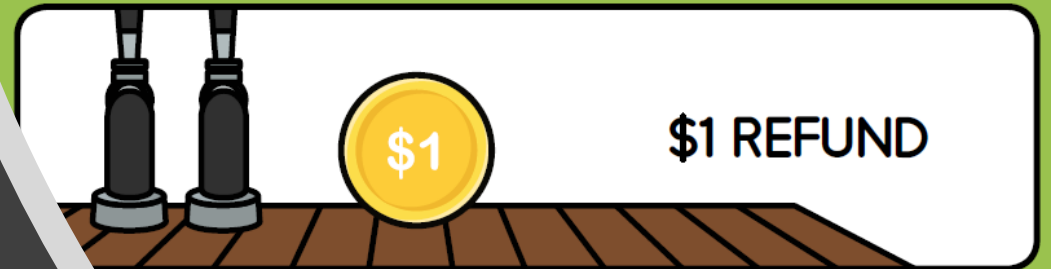
- Take the cup home as a souvenir
- Return the cup for a \$1.00 refund
- Donate the cup, and the \$1.00 refund, to the charity of venues choice



\$2 DEPOSIT



UNLIMITED FREE EXCHANGES



\$1 REFUND



IT'S IN YOUR HANDS

WISE On-Site Staff Training Sessions

WISE will conduct a hands-on walkthrough of the WISE cup process from BAR manager perspective

- Opening WISE crates
- Bar signage
- Stacking bars with cups
- Collecting \$2.00 deposits & free cup exchange
- \$1 refunds or charity donation
- Counting used cups
- Re-sealing WISE crates
- End of shift / stocktake



- **Why re-use over re-cycle?**

- Re-use - Remember the old Glass milk Bottles?? When washed and re-used they had next to zero impact on our environment
- Recycling - involves destroying the product back to its raw state and re-building it again from scratch.
 - This process is no different, and often more expensive due to the collection and sorting cost , than building the product the first time from virgin materials
- Re-use - requires a fraction of the effort and therefore also has a fraction of the environmental footprint of a recycled product.

- **How many Single use cups does each WISE cup replace?**

- Each WISE cup can be re-washed up to 500 times. In doing so, it will replace 500 Single-use PET cups in its life cycle.

- **Who pays?**

- WISE is a user pays system. The user pays at their first transaction and nothing more all day. There are unlimited free exchanges after the first purchase.

- **What happens after the event?**

- At the end of the event the consumer has 3 x options:
 - Return the last cups for a \$1.00 refund
 - Take the cup home as a souvenir
 - Donate the cup, and the \$1.00 refund, to a charity

F.A.Q's

- **Where are the cups made?**
 - Our Australian manufacturing plant is still under construction. In the interim, our cups are made in Europe.
- **What are the cups made of?**
 - All WISE cups are made from virgin Polypropylene. At the end of their useful life, our cups will be re-deployed as other WISE products in a true closed loop process.
- **Who designed the WISE wash-Plant?**
 - Our IP Protected WISE wash plants are at the cutting edge of technology and have been designed inhouse, in partnership with a major European manufacturer
- **How many cups do they wash / dry / cool per hour?**
 - With near zero emissions, they cycle up to 10,000 cups per hour
- **How much water does the WISE wash-plant use?**
 - In full production, the WISE wash plant consumes a record breaking 92 litres of water per hour
- **Where do the cups get washed?**
 - WISE has multiple dedicated wash facilities where the used cups are washed, inspected and hygienically re-packaged ready for re-deployment

Wise

It's in your hands



19 July 2019

Hon Stephen Dawson MLC
Minister for Environment, Disability Services & Electoral Affairs
12th Floor, Dumas House
2 Havelock St
West Perth WA 6005

By email: Minister.Dawson@dpc.wa.gov.au

'Let's not draw the short straw' Discussion Paper

Dear Minister

Woolworths Group is pleased to provide a written submission in response to the 'Let's not draw the short straw' Discussion Paper.

Woolworths employs over 14,000 Western Australians, operating 101 supermarkets, 17 Big W stores and over 150 BWS and Dan Murphy's liquor outlets throughout the state.

Our Western Australian supermarkets sell some of the State's most iconic food brands including Brownes Dairy, Yahava Coffee, British Sausage Co, Golden Eggs and Granny's.

Woolworths is committed to playing our part in reducing our use of plastic and helping our customers and teams to recycle.

We were the first major supermarket chain to eliminate single-use plastic bags and the sale of plastic straws from our stores nationwide, and we continue to work with our suppliers on reducing plastic across our product range while at the same time maintaining convenience and value for our customers.

Some items require further work before they can be eliminated. For example, technological developments are required to find alternatives to plastic straws attached to cartons. As a responsible retailer, we are also mindful of social and medical reasons for the continued use of single-use plastics by some members of the community.

Support of circular economy

We **strongly support efforts** by the Western Australian government to reduce the volume of single-use plastics in the environment and the transition to a circular economy. Ideally government action should take place on a **nationally consistent basis**.

At the same time, it is important that any changes to current laws and regulations **avoid any unintended consequences** for Western Australians or the environment. Reusable and/or recyclable plastic products can continue to play a role in supporting recycling, food waste reduction and broader sustainability initiatives.

We appreciate that the Government has a duty to respond to community sentiment. However, we note that voluntary online surveys of the kind made available in the current process are based on a self-selecting sample and may not be representative of the views of the mainstream Western Australian community.

Shopping bags

Removal of single-use plastic bags

Woolworths appreciates that single-use plastic shopping bags have historically been a highly visible contributor to plastic pollution.

We are proud to confirm that this type of bag is now no longer available in any of our Woolworths or Big W stores nationwide, even in markets where there has been no government intervention.

In implementing this change, Woolworths was cognisant of the fact that our diverse customer base has varying needs and shopping patterns. Consequently, we offer a number of alternative bag options.

- Our entry-level supermarket bag is the 15c reusable 55 micron low-density polyethylene (**LDPE**) plastic bag. The bag is priced for expense recovery rather than for profit. This bag contains at least **80% post-consumer recycled content**, is certified by Good Environmental Choice Australia (GECA) or Blue Angel and designed for multiple re-use by customers.
- We also sell a 99c 'Bag for Good', made from non-woven polypropylene. This heavy duty bag is also designed for multiple re-use. Customers only need to purchase this bag once, as it will be replaced for free should it become damaged or soiled. The returned bag is then recycled.

Any profit from the sale of this bag is used for good causes: it currently funds the Woolworths Junior Landcare grants programme, which encourages young people to play an active role in sustainability. The first round of grants has seen around over \$59,000 distributed to 60 schools and early learning centres in WA.

- Other options include a 99c foldable bag and a \$2.49 chiller bag. Both of these are also designed for multiple re-use.

The removal of free single-use plastic bags has had the intended outcome, with a dramatic **93% fall in the quantity of plastic bags** being annually distributed by Woolworths supermarkets across the country. Nationally, Woolworths Group distributed approximately 3.2 billion plastic bags in FY18, the last full year before the single-use bag removal came into effect. The number of reusable plastic bags distributed over FY19 fell by approximately 3 billion to 220 million a year.

By sales our most popular bag option is the 15c, 55 micron reusable bag. This bag plays an important role as an affordable 'emergency' bag for unexpected shopping trips and for those people who walk or take public transport to the supermarket and cannot take bags with them or have forgotten them. With cost of living pressures a real consideration for many Western Australians, it is important that an affordable bag option remains available for these circumstances.

Evidence suggests that Woolworths customers are using the 15c, reusable 55 micron bag as intended - as a bag to reuse over and over again. Current data indicates that **80% of customers are not purchasing a bag**, the average bag purchase over all transactions is much less than 1 bag per transaction, and the number of bags purchased in WA has declined since lightweight bags were removed from sale in the state.

Impact of alternatives

While our current 'emergency' reusable 15c plastic bag is already made from at least 80% post-consumer recycled plastic, Woolworths is continually evaluating new technologies and products.

However, our own life cycle analysis¹ and external research² suggests that the 15c LPDE bag is the **most sustainable option currently available** when all environmental impacts (climate change, water resources and other factors) are taken into account. Similarly, a Danish LCA concluded that a 55 micron bag has the least impact to the environment when all things are considered (ie energy, water, transportation, CO₂)³.

Production of alternatives such as paper, plant based or cotton bags all involve resource impacts⁴, and in the case of paper bags may not be suitable for continued re-use. For instance, a lifecycle assessment completed across a range of bags indicates that a paper bag would need to be re-used 43 times in order to offset its kg/CO₂ impact. Of course, there are also advantages to using paper as an alternative to plastic. For example, if you are trying to solve for litter reduction and reducing ocean plastic then paper is a better alternative since it can be recycled via kerbside bins.

We are also mindful that higher-priced bags would also have an impact on more vulnerable customer groups.

Plastic packaging

Our customer research suggests that plastic packaging is the top-of-mind issue relating to plastic (rather than reusable plastic bags). Our customers also tell us that minimising food waste is of greater concern to them than the elimination of plastic packaging.

¹ PIQET lifecycle analysis

² See for example, a February 2018 study by the Ministry of Environment and Food of Denmark (<https://www2.mst.dk/Udgiv/publications/2018/02/978-87-93614-73-4.pdf>)

³ <https://www2.mst.dk/udgiv/publications/2018/02/978-87-93614-73-4.pdf>

⁴ For instance, the February 2018 Danish study suggests that conventional cotton bags would need to be reused 7100 times to provide the same environmental performance of the average LDPE carrier bag, reused as a waste bin bag.

Woolworths is committed to reducing plastic packaging and **we have removed around 700 tonnes of plastic packaging** since 2018. We are also a member of the Australian Packaging Covenant Organisation (APCO) and have adopted the APCO target for 100 per cent of Australian packaging to be recyclable, compostable or reusable by 2025. A significant barrier faced by industry in this area is the **lack of sufficient Australian recycled content/resin**. The WA Government should consider measures to support the local recycling industry in close cooperation with other state and territory governments.

Plastic reduction is a complex task given that packaging protects the quality and extends the shelf life of fruit and vegetables as they are transported from the farm to the store and to our customers. For example, a plastic wrapped continental cucumber lasts 3 times longer than an unwrapped continental cucumber. The plastic also helps to prevent dehydration and physical damage to the cucumber in transit from the supplier to the customer - keeping the cucumber fresher for longer.

Food waste has a significant environmental impact. For instance, UK research found that the environmental impact of food waste is far higher than that of packaging - 50% more food waste is thrown away than packaging, and significantly more packaging is recycled than food waste is composted.

Environmental Impact Household Packaging v Household Food Waste

<ul style="list-style-type: none"> ● Household Packaging <180 kg per household per year ● 67% recycled or recovered ● ~ <2.5T CO₂ / Tonne 	<ul style="list-style-type: none"> ● Food waste 262 kg per household per year ● <20% composted/treated ● ~39T CO₂ / Tonne
---	--

Source: Wrap UK June 2018

Other plastic products

As noted above, Woolworths no longer sells plastic straws. We are also in the process of phasing out polystyrene cups from all of our stores nationally, which will see a reduction of 18 million cups.

For other products (such as plastic cutlery, plates, stirrers, cotton buds and food containers), our aim is to offer our customers the choice of plastic free alternatives, when available. Given the increased cost of some alternatives, we believe providing choice to customers ensures that value-conscious consumers are not left behind.

However, if the Government is minded to take legislative action on particular products, we suggest that it does so in line with the moves currently underway in South Australia, which has indicated it will legislate to ban plastic straws, cutlery and stirrers⁵. It is important that any ban excludes products made from bioplastics or compostable material.

Woolworths would be supportive of longer term Government efforts to eliminate the below single-use products across the state, bearing in mind there needs to be sufficient lead time

⁵ <https://www.greenindustries.sa.gov.au/priorities/plastics>

for industry and retailers to locate/develop and then transition to recyclable or multiple-use alternatives:

- Plastic cotton buds
- Plastic straws
- Oxo-degradable plastics
- Disposable plastic cutlery, stirrers, plates and bowls
- Non-recyclable coloured plastics (including carbon black plastic e.g. some ready-meal trays, premium meat trays, some pre-packed fish trays)
- Disposable plastic cups
- Polystyrene
- Multi-pack rings for canned drinks
- Traditional plastic produce bags

Boosting recycling

Every Woolworths supermarket in the state has a prominent RedCycle bin, for customers to recycle their soft plastics, including the 15c reusable 55 micron bag. Nationally over the past year, our **customers have returned approximately 200 tonnes of soft plastics** for recycling.

However, there is a clear role for government in boosting the WA recycling/composting industry and the **public availability of food and organic waste recycling**. Inadequate local recycling and reprocessing capacity in Australia has historically resulted in export of most plastic waste. This is more pronounced for WA as geographic constraints can make it cheaper and faster to export overseas than to transport to limited local recycling infrastructure in the Eastern states.

Changing international approaches to exported plastic waste present an opportunity for Australia, and WA, to demonstrate leadership by funding and/or providing incentives for the development of local plastic recycling infrastructure.

We are a strong supporter of the WA's planned container deposit scheme. The logical next step can be developing local recycling infrastructure to process the collected waste from both kerbside and CDS streams.

We also suggest that government **invest in a community education campaign** to improve trust in the recycling process (the role plastic plays in reduction of food waste, how to recycle particular products, what happens after material is collected).

Curbside organics

Our research tells us that customers want us to use more compostable packaging, but this is only feasible when consumers have access to facilities such as curbside organic bins to properly dispose of these items.

There is still much to do, but the Woolworths Group is committed to reducing the volume of single-use plastics in the environment and appreciates the opportunity to contribute to the Government's consultation.

Yours sincerely

Paul Crossley
Government Relations Manager
Woolworths Group Limited

