

From: [Dean Davis](#)
To: [Plastic Action](#)
Cc: Minister.Dawson@dpc.wa.gov.au
Subject: Port hedland forum update
Date: Friday, 5 July 2019 4:07:35 PM

Good Afternoon

My Name is Dean Davis and went to your forum in Port Hedland I spoke about Government documentation recommending to place Biohazardous waste into general/ Recycling waste streams

<https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhealthy.wa.gov.au%2F%2Fmedia%2Ffiles%2FHealthyWA%2FOriginal%2F1850-safe-needle-disposal-poster.pdf&data=02%7C01%7Cplastic-action%40dwer.wa.gov.au%7C542f53ae3af44f4a363b08d7011fd479%7C53ebe217aa1e46feb88e9d762dec2ef6%7C0%7C1%7C636979108550112892&data=CREnLfcXsZ7ZkYZMuejJF2ZP%2BTsjWqezG%2F7%2BpS%2BLr0%3D&reserved=0>

1. it promotes contaminating domestic rubbish with biohazardous waste
2. the document states not to use frosted plastic yet they use frosted plastic in demonstration leaving it extremely misleading for people that have trouble reading or English is second language.

with refunds/money for plastic returns/Recycling this will see general public collecting plastic bottles, this type of government promotion will see Recycling stream contaminated and safety of public and Recycling workers placed in extra danger.

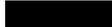
The bottles the government is promoting the use of are un-rated not colour coded and go against all recommend procedures/policies dealing with biohazardous needle waste and place rubbish contractors, 3rd parties at risk and create unmonitored environmental issues as supplied to Minister Dawson of the town of port hedland landfill.

This perceived risk needs to be addressed.

Last year bringing our landfill environmental issues and biohazardous waste your office and minister Dawson attention and being told no procedures/policies in regards to NSP unprotected/unmonitored biohazardous waste dumping and no reported action being taken.

I would like to be informed if this has been corrected and the department now has procedures/policies guidelines for NSP biohazardous waste and for a copy.

Regards
Dean Davis



From: [Dean Swift](#)
To: [Plastic Action](#)
Subject: Tip for reducing single use plastic bags
Date: Friday, 24 May 2019 8:59:42 AM

Hello,

I posted a video here (<https://www.youtube.com/watch?v=h05xUuRx19g>) for a great tip for reducing single use plastic bags.

This helps you to remember to bring your re-usable bags into the store you regularly visit so that you don't end up purchasing more plastic bags.

It uses the location technology and reminders that are easily available on the smart phone.

Check it out.

Kind regards,

Dean Britton


REDUCING SINGLE-USE PLASTICS IN WA - RESPONSE PAPER

The Detmold Group (Detmold) is a global packaging manufacturer, based in South Australia. We are recognised as a leader in packaging sustainability, receiving multiple awards from the Australian Packaging Covenant Organisation (APCO) and from some of the world’s largest foodservice brands. We strongly support the Government of Western Australia in pushing to take a global lead in the banning of unnecessary single-use plastic products.

Detmold supports similar programs in other states, Europe, China and the US.

We believe the WA Government should legislate that all single-use carry bags, cups, straws, plates and grocery bags must be recyclable by 1st July 2020. By taking a strong stance on recycling, and working with the many organisations who want to create a better future, we believe that together we can inspire the population in pursuit of this important goal.



Response to key questions

Do you believe single-use plastic products are causing environmental problems?

Yes, Detmold believe single-use plastics are a significant problem in litter and marine pollution. Plastics should be diverted from landfill, however they are not being recycled at an acceptable rate in Australia today.

Detmold strongly support introducing measures to address single use straws and coffee cups. All acceptable alternatives should be recyclable or genuinely reusable. The measures should extend to all beverage cups (not just coffee) and include plates.

What regulatory or other approaches do you support to address consumer single-use plastic in WA?

Detmold support banning any single-use bags or plastic items that are not recyclable. We are also concerned about biodegradable, degradable and even compostable bags or single-use plastic items as these present a high risk to the environment in terms of microplastic residues and marine pollution. These 'bio' plastics are challenging for recyclers and none of them facilitate keeping material resources in use and contributing to a circular economy. Detmold believe genuinely reusable options and paper packaging are the solutions that should be endorsed.

We believe the ACT Government should legislate that all single-use carry bags, cups, straws, plates and grocery bags must be recyclable by 1st July 2020.

As a manufacturer, importer or retailer of consumer single-use plastic products, what cost and other impacts do you think need to be considered as part of this discussion?

As an Australian manufacturer and retailer of single-use packaging, the majority of packaging items that we supply are paper and board based and 100% recyclable through existing waste streams.

We offer recyclable alternatives for cups, bags, straws and plates today, and support Government intervention to drive the community towards these sustainable products. There are cost impacts in many situations but the costs are manageable and can often be reduced by careful limiting of the use of disposable items.

We have seen industry and consumers adapt to the lightweight plastic bag bans with minimal impact in many states now across Australia, and the same will happen with other product categories. By introducing legislation the Government will simply be providing the final additional push that industry need to switch to more sustainable packaging options. This is difficult for a single operator to implement when competing with many other retailers, but if entire territories or states shifts at once, no business is unfairly penalized.

Further:

By choosing recycling over composting the WA Government will be showing true leadership. Only through recycling do we reduce the number of trees being cut down to make paper products, and only through recycling are we 'keeping products, components and materials at their highest utility(ii) which is fundamental to creating a circular economy.

Packaging is an acceptable filler in commercial compost, but PLA lined packaging slows the composting process(iii) leading to logistical and cost issues, and increasing the risk of releasing a product which contains microplastic residues into agricultural areas. In Australia, there is limited access to industrial composters, meaning that composting is not a viable commercial solution for packaging, or a globally scalable solution (iv) (v). If we are going to use legislation to drive an environmental outcome, let's target the solution which follows the 'imperative to keep material resources in use, or 'circulating' for as long as possible' (vi), and that is recycling paper back in to paper products and plastic back in to plastic products, wherever possible.

Detmold is willing to take a leading role working with businesses, Government and other motivated organisations to implement this change. We are uniquely placed to support the transition with our global exposure to sustainable packaging solutions, our relationships with thousands of foodservice, grocery and retail brands, and our genuine commitment to making a better Australia.

ii Green Industries SA 'Potential Benefits of a Circular Economy in South Australia' (2017)

iii Field Study: Foodservice Packaging as Compost Facility Feedstock October 2, 2018, Compost Manufacturing Alliance

iv Introducing compostable packaging before processing systems are in place is creating a problem not solving one', AUCKLAND, May 30, 2018, The Packaging Forum

v The compostable cup you can't compost, and the trouble with our recycling system, By Liam Mannix, Sydney Morning Herald, 1 July 2017

vi Green Industries SA 'Circular Economy for SA Summary' 2017

Why Bans on Specific Non-Recyclable Packaging Is Appropriate

There are multiple, commercially viable, recyclable solutions available for each of the products for which Detmold supports specific enhanced legislation. A simple (but decisive) step to legislate recyclable options would be the catalyst needed to convince brands and retailers to change from single-use plastics to recyclable alternatives.

Our recommended list of products that should be specifically identified in recycling legislation are:

Item	Banned 	Allowable 
Carry Bags	Lightweight plastic (already in place) Heavy-weight plastic (30-100um) Plastic/paper laminates	Paper bags Innovative materials where the retailer can provide a recycling guarantee
Cups	PE Lined Paper (Hot and cold cups) PLA Lined Paper PLA Plastic Cups	Recyclable Paper Cups (where retailer provides recycling guarantee) PET Plastic Cups PP Plastic Cups
Straws	Plastic Straws PLA and biplastic straws	Paper (re-pulpable) straws Non-plastic plant based materials (pasta, bamboo, wood)
Plates	Plastic plates Plastic coated plates	Paper Plates Moulded pulp
Grocery Bags	LDPE Bags HDPE Bags	Paper Innovative materials where the retailer can provide a recycling guarantee

Detmold believe PLA straws, compostable plastic carry bags and grocery bags all present the same risk for marine pollution, litter and wildlife as other plastics, and therefore should not be approved alternatives.

PLA lined paper cups and PLA plastic cups are not recyclable and do not meet circular economy principles. Whilst Detmold pioneered compostable coffee cups in the Australian market, we no longer believe they are a leading solution for the coffee cup challenge facing us today and they do not reduce the need for more trees. Instead Detmold offer the RecycleMe™ cup solution which utilizes a next generation coating and provides a collection system which guarantees that every cup collected will be recycled.

The RecycleMe™ lining reduces plastic use by over 40% in coffee cups (reducing plastic content from 5% to 3%), and it is easily removed during the re-pulping process making RecycleMe™ coffee cups a valuable source of high quality bleach paper fibre, which is in great demand in Australia. Coupled with the comprehensive RecycleMe™ cup collection service, and the many partnerships with coffee and foodservice businesses across Australia, there is finally a viable, innovative solution for disposable coffee cups going to landfill.

Detmold support the use of the APCO Towards 2025 definitions for recyclability, the use of the Australasian Recycling Label (ARL) to provide clarity for disposal. We also support consideration of a bold approach that requires all retailers to accept back all used packaging that is not recyclable through other widely available streams, and that those retailers are required to ensure that this returned packaging is disposed of appropriately. Minimum targets could be set and enforced for businesses to divert their waste (include that returned to them by customers) from landfill. Over time this waste collection supply chain will become a valuable, clean and sorted resource stream.

The WA Government must ensure that any of the solutions that are supported by this new legislation are also considered from an ethical and legal sourcing and manufacturing standpoint. We must protect against introducing products which meet the end of life goals, but are made from controversial forestry sources or with questionable employment practices. Detmold has FSC™ and PEFC™ sustainable forestry certifications and achieves 'A' ratings in Supplier Workplace Accountability audits in both its South Australian manufacturing facilities and its global operations.

Implementation

Detmold is well placed to assist the WA Government to work with industry and other organisations to successfully introduce single-use plastic bans. Detmold already works closely and collaboratively with APCO (AUstralian Packaging Covenant Organisation, Planet Ark and other packaging companies. We are on the global Sustainability Leadership Council for McDonalds, we work on sustainability strategy and packaging planning with Hungry Jacks, KFC, On The Run, Coles, Woolworths, Subway, Nandos, Country Road, Witchery and many other leading retailers and consumer good brands. We work with collection partners, recyclers and paper mills globally and are happy to collaborate right across all sectors to assist the WA Government to implement the vision of progressively removing single-use plastic products and becoming a world leading circular economy.

From: [Eric Gorman](#)
To: [Plastic Action](#)
Subject: Survey
Date: Tuesday, 18 June 2019 7:32:26 PM

Wouldn't allow me to move on, anyhow I think what did we do before single use plastics?, stop the supply, make people use there own lunch boxes, cups, spoons etc

Sent from [Mail](#) for Windows 10

From: [Finn Parker](#)
To: [Plastic Action](#)
Subject: Ideas for reducing single-use plastic waste
Date: Thursday, 11 July 2019 1:29:23 AM

Dear Manager,

Australia's environmental regulations at the governmental level are poor to say the least in comparison to other countries of similar wealth. While community awareness and input is rising, the whole point of such support is for change, and that can only come from you. With the help of Sea Shepherd, I have developed a few points that I think are of personal critical importance, that must be revolutionised if we are to help conserve the environment in which we live. When better to start than now? I suggest the following:

- Like SA, ban all single-use plastic items, like straws, plates, and cutlery; as well as takeaway coffee cups and polystyrene containers.
- Introduce guidelines and new targets for reducing plastic food packaging - this may also hopefully help the survival of smaller businesses such as butchers and fruit markets.
- Restrict sale/ tax all single use plastic shopping bags to reduce their usage - if you tax the sale of them, you can also make a profit!
- Implement a universal smoking ban on all WA beaches.
- Provide clear, unambiguous and standardised labelling which indicates how waste should be disposed (recycling or landfill etc.). I recommend the inclusion of lists of negative effects of packaging next to these symbols (especially plastics going into landfill).
- 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.
- Increase signage (it's relatively cheap and easy!) at popular beaches highlighting the impacts of plastics in our oceans, encouraging beach-goers to take their rubbish home or face fines. Interesting signs are always better; maybe try including a different fact about plastic on each one to encourage people to read every sign and as conversation starters about the issue. Facts could include: half of all plastic made is designed to be used once, every single piece of plastic made is still with us today, 13million tonnes of plastic are dumped into our oceans daily, etc.

Thank you very much,

Finn

Yours sincerely,
Finn Parker

This email was sent by Finn Parker via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Finn provided an email address [REDACTED] which we included in the REPLY-TO field.

Please reply to Finn Parker at [REDACTED]

To learn more about Do Gooder visit <https://aus01.safelinks.protection.outlook.com/?url=www.dogooder.co&data=02%7C01%7Cplastic-action%40dwer.wa.gov.au%7C448631aa4c6940f90f4308d7055c24f1%7C53ebe217aa1e46feb88e9d762dec2ef6%7C0%7C0%7C636983765631510184&data=MdkGXeGVT35YAbvk5mg7BVKConLl2l5VoZ38qc6qOfg%3D&reserved=0>

To learn more about web protocol FC 3834 visit: <https://aus01.safelinks.protection.outlook.com/?url=www.rfc-base.org%2Frfc-3834.html&data=02%7C01%7Cplastic-action%40dwer.wa.gov.au%7C448631aa4c6940f90f4308d7055c24f1%7C53ebe217aa1e46feb88e9d762dec2ef6%7C0%7C0%7C636983765631510184&data=BSVy%2BeuqauMuQ1wtUZEgmOIYEY1842icizIiEAsCtI8%3D&reserved=0>

From: [fox_ward](#)
To: [Plastic Action](#)
Subject: Feedback - Reduction of single use plastics
Date: Monday, 10 June 2019 10:25:35 AM

Good Morning

I'd like to request some further information, in relation to the paper and survey that has gone out to the public, regarding a reduction in single use plastics. Unfortunately the awareness of this has taken some time to get to my eyes, so I have missed the opportunity to participate in the workshops in my area.

I am a huge supporter, of Australia and Australians, finding ways to improve our environmental impact. At my current workplace, a huge push to reduce the use of single use plastics has gained fantastic momentum. However I have grave concerns about how this impacts other areas, and would like to know what considerations will be taken for these impacts, if changes are implemented state or nation wide, to reduce single use plastics.

The reduction of single use plastics in my workplace has seen an increase of water usage to keep the multi-use alternatives clean. With an ongoing campaign to "Use Water Wisely" I feel this would need to be addressed on a community scale, if the uptake of multi-use plastics was to increase, and am keen to learn what considerations have been taken into account here?

Although single use plastics is an issue I strongly believe should be addressed, I think to do it as a stand alone issue is thinking rather narrowly.

I believe waste reduction should be looked at as a whole, to ensure we don't just shift one problem to create another.

I would very much like to hear how this has been considered.

Kind regards

Fox Ward.

GREENBATCH FOUNDATION



8th July 2019

“Let’s not draw the short straw” reduce single use plastics

Greenbatch Foundation’s collation of 3 community workshops, involving 82 people looking beyond just the single use plastic.

Contributors: Melissa Dor; Darren Lomman; Phil Dowling; Abi Ankrach; Fay Enston; Ian McRae; Robin Coombe; Katie Feenan; Victoria Wildie; Jeroen en Marloes; Vincci Cheng; Lisa Properjohn; Nicole Buschgens; Tim Gates; Madison Stone; Karen Ireland; Suzanne Miles; Sofia Katzin; Kristian Madaschi; Anu Bhatadwaj; Danielle Pisconeri; Lauren Hamilton; Meredith Rubery, Jane Rebeiro; Maryline Cassov; Tyrone Atter; Sean Standen; Natasha Rogers.

Greenbatch Foundation

“LET’S NOT DRAW THE SHORT STRAW” REDUCE SINGLE USE PLASTICS

EXECUTIVE SUMMARY

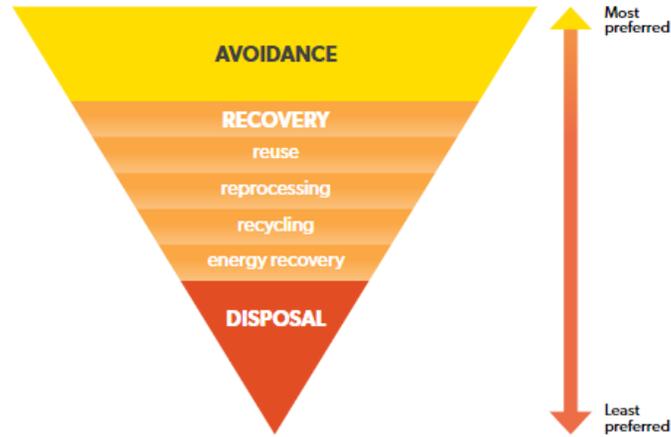
Whilst Greenbatch Foundation commends the WA State Government on its initial efforts to address plastic pollution, the community is expecting much more from its elected leaders and Departments. These expectations include broadening Government’s view of the problem (ie taking a value chain and circular economy approach) which will lead to more systemic and substantial solutions being considered, such as building a stronger coalition of support from the community and enabling alliances with industry that will redesign the WA plastic value chain.

There is significant public concern about the management of plastic waste in our environments, with no less than 55% of respondents to the 2017 Plastic Waste Survey of WA Households conducted by the Boomerang Alliance, expressing concern for plastic products and plastic waste in our community. (see Appendix 1 for the table of results).

The Department of Water and Environmental Regulation’s (DWER) Issues paper “Let’s not draw the short straw: reduce single use plastic” (The Issues Paper) framed the problem in a similar way to the Waste Avoidance and Resource Recovery Strategy (WARR Strategy), as the “wicked problem” of over consumption and production of single use plastics by the community and industry. It proposes solutions such as a ban on specific plastic products like straws, plastic cutlery and balloons. However, alternative solutions were not perceived to be readily accessible or available either economically or within the existing infrastructure.

In 2016-2017 Western Australians consumed 368,600 tonnes of plastic with 27,200 tonnes (7.4%) being recycled (O’Farrell, 2016-2017). A possible solution presented in The Issues Paper is aligned with the Waste Hierarchy of **avoidance** being the most preferred. Whilst Greenbatch agrees with this position to a point, there is strong community interest and support for a more systemic approach of also increasing the recovery, reuse, reprocessing and local recycling infrastructure of plastic waste across all sectors.

Figure 3: Waste hierarchy

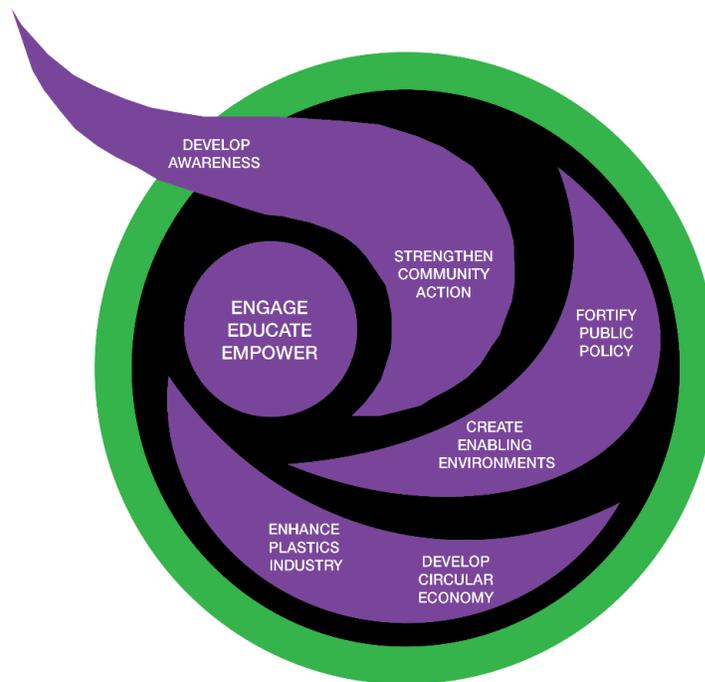


Resource recovery options recover value from materials, thereby offsetting the environmental impacts of extracting and processing raw materials. Energy recovery is the least preferred recovery option.

Disposal is the least preferred option. Disposal generally recovers the least value from materials and delivers the least environmental benefit.

Waste Avoidance and Resource Recovery Strategy 2030. Government of Western Australia 2019.

Working towards achieving these goals, Greenbatch Foundation recognised the need for an alliance between industry, government and community and as such invited community to provide collated feedback in a series of three 1.5-hour workshops capturing diverse demographics totaling 82 people. The following submission is the collated responses from the workshops.



GREENBATCH ADAPTATION OF THE OTTOWA CHARTER, 1986 (WHO)

The framework informing the workshops was a model adapted from the Ottawa Charter 1986, with Greenbatch Foundation's mission of Engage, Educate and Empower underpinning all three pillars of;

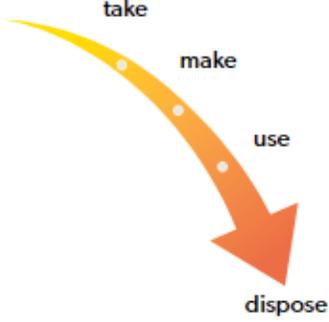
1. **Community:** Develop Awareness; Strengthen Community Action;
2. **Government:** Fortify Public Policy; Create enabling environments and
3. **Industry:** Enhance plastics industry; develop circular economy.

To inform the Workshop audience, there was a 30-minute presentation regarding the content and design of the Issues Paper and alternative solutions from around the world exemplifying a circular economy approach. The overarching question was asked of the participants; What do they want government and industry to be considering regarding single use plastics and waste plastic pollution in their home, their local community and their State? The participants were then asked to break into 3 groups and participate in a "Placemat" activity where they were asked to write down ideas for actions that Government, Industry and Community could to improve the rate of recovery, reduce the use of single use plastic and increase the rate of diverted waste from landfill, with the key objectives of Western Australia's Waste Strategy paper; Waste Avoidance and Resource Recovery Strategy 2030, firmly in mind. The Top 3 ideas from each group were placed in the middle of the "Placemat". Appendix Four has the complete transcripts from these sessions.

As a follow-up of the workshops, an online collaborative open source document was made available for all participants in the workshops to author a contribution to the final submission. These public contributions have informed the following submission alongside research and Greenbatch Foundation's position on the Issues Paper.

Overwhelmingly the responses were very aligned with the circular economy ideals of 'closing the loop'. Responses also included the call to adopt more transparent discussion of the problem, with additional policy instruments being implemented to provide clear directives for industry and local government regarding collection, recovery, processing and **recycling of plastic packaging**. Many responses also aligned with the Australian Packaging Covenant Strategic Plan 2017-2022, which has identified the need for "clear and consistent consumer information to alleviate confusion" (Australian Packaging Covenant , 2016).

Figure 4: Current waste approach versus circular economy

Current approach	Circular economy
	
<p>Linear flow of materials – ‘take, make, use and dispose’ model.</p>	<p>Circular flow of materials – materials sorted and retained in the economy for as long as possible.</p>
<p>Limited use of renewable materials and energy.</p>	<p>Preference for renewable materials and energy.</p>
<p>Significant volumes of materials disposed of and lost to the economy. Loss of embodied materials, energy and water.</p>	<p>Materials recovered as high up the waste hierarchy as possible. Embodied materials, energy and water retained in the economy. Organic materials re-enter and regenerate the environment safely (for example, as compost).</p>
<p>Materials managed locally and globally.</p>	<p>Preference to manage materials locally to reduce the costs and impacts of transport, and to provide local employment and investment opportunities.</p>
<p>Economic value of materials, employment and investment not fully accounted for.</p>	<p>Economic value of materials, employment and investment accounted for.</p>
<p>Limited focus on life cycle thinking.</p>	<p>Products designed and manufactured to minimise environmental impact through whole of life.</p>

Waste Strategy paper; Waste Avoidance and Resource Recovery Strategy 2030

Informed by the public contributions, an action plan has been identified by Greenbatch Foundation which includes:

- Make the achievement of a circular economy the top priority aligned with SDG12.
- Shift the position of the regulators from being in a reactive state to adopting a proactive state with a stronger leadership position.
- Develop a sustainable appetite for recycled products by all sectors to drive the demand for infrastructure.

THE PROBLEM

The Issues Paper focuses on the singular use of plastic almost exclusively, however it is not the use of the plastic items that is the dominant problem, but rather the single use design and the waste pollution created by user behavior. If the plastic products are re-used, recovered and recycled then the plastic becomes a resource rather than a disposable item. The 3 pillars of our economy would benefit from a mindset shift to start considering plastic as the reusable resource it is, with a significantly reduced environmental footprint than processing virgin plastic, recycling aluminum or glass, or manufacturing compostable products. The problem of plastic waste pollution is a global challenge and recognised universally as one of the world's most urgent and pressing problems, but on a local level it is even more pressing as Western Australia's environmental footprint in plastic consumption continues to increase since we have very little reprocessing capacity.

The 368,600 tonnes of plastic that Western Australia consumes¹ annually creates an urgent need for a systemic approach. The Issues Paper addresses just the 'tip of the iceberg' of the problem and does not provide solutions for sustainable plastic waste management which should include recovery, reuse, reprocessing and recycling as part of the policy solutions directed by government.

Table 20 – Plastics consumption by jurisdiction and polymer type in 2016–17 (tonnes)

Polymer type	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Total
PET (1)	5 800	110 500	3 500	69 200	24 200	7 300	88 800	36 300	345 600
PE-HD (2)	9 400	180 600	5 700	113 200	39 600	12 000	145 300	59 300	565 000
PVC (3)	6 100	117 700	3 700	73 800	25 800	7 800	94 700	38 600	368 200
PE-LD/LLD (4)	5 600	107 100	3 400	67 100	23 500	7 100	86 100	35 100	335 000
PP (5)	5 500	105 200	3 300	66 000	23 100	7 000	84 600	34 500	329 200
PS (6)	800	15 000	500	9 400	3 300	1 000	12 100	4 900	46 900
PS-E (6)	1 100	21 500	700	13 500	4 700	1 400	17 300	7 000	67 200
ABS/SAN/ASA (7)	900	16 800	500	10 500	3 700	1 100	13 500	5 500	52 400
PU (7)	1 300	24 800	800	15 500	5 400	1 600	19 900	8 100	77 500
Nylon (7)	2 100	40 200	1 300	25 200	8 800	2 700	32 300	13 200	125 600
Bioplastic (7)	<100	<100	<100	<100	<100	<100	<100	<100	<100
Rubbers (7)	9 300	177 300	5 600	111 200	38 900	11 700	142 600	58 200	554 800
Other (7)	3 700	70 100	2 200	44 000	15 400	4 600	56 400	23 000	219 300
Unknown polymer	7 100	136 300	4 300	85 400	29 900	9 000	109 600	44 700	426 300
Total	58 600	1 122 900	35 200	704 000	246 200	74 400	903 300	368 600	3 513 100

(O'Farrell, 2016-2017)

Australia's plastic consumption is rising again following a reduction in 2015-2016 substantially as the 2016-2017 Australian Plastics Recycling Survey- National report illustrates. (O'Farrell, 2016-2017)

As is being seen in South Australia's proposed State-wide ban on single-use plastic straws, plastic cutlery and plastic stirrers following public consultation, there is significant confusion and misinformation regarding what the difference is between 'biodegradable', 'degradable', 'oxo-degradable plastic' and 'compostable'. (Government of South Australia: Green Industries SA, 2019) Asking for public submissions regarding single-use plastic items and suggesting that these may be produced from materials that are somewhat 'biodegradable'

¹ Consumption; total use of product by Australian industry and consumers. Includes local made and used product, imported product and locally utilised recycle. Does not include locally made product that is exported for sale. (O'Farrell, 2016-2017)

needs to include comprehensive definitions of what these terms mean and the impact to any current or future recycling infrastructure, before presenting them as viable alternatives.

The lack of transparency and information regarding the current state of Western Australia’s recycling infrastructure has created an environment of mistrust and anxiety amongst community members as they discover the recyclable material that they diligently place in recycling bins has been shipped offshore without local reprocessing facilities being available. See Appendix Four for the workshop transcripts of the placemat activity supporting this assertion.

On a national level, the export of waste materials offshore, as can be seen from the tables below, is substantial and represents leakage in the potential circular economy loop that has been identified as a key target in the Waste Strategy paper; Waste Avoidance and Resource Recovery Strategy 2030.

Data table for Figure 18 Exports of waste materials for recycling by type from Australia to all destinations, 2006-07 to 2017-18

Kilotonnes

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	CAGR
Metals	1,575	2,011	1,981	1,852	1,874	2,432	2,401	2,695	2,466	1,965	2,141	2,447	4.1%
Plastics	100	129	249	207	233	290	259	268	256	226	215	220	7.4%
Paper, card	1,105	1,332	1,265	1,497	1,384	1,466	1,567	1,497	1,497	1,535	1,453	1,324	1.7%
Other	84	197	137	111	255	306	296	309	326	327	400	315	12.7%
Total	2,864	3,669	3,632	3,666	3,746	4,494	4,523	4,768	4,545	4,053	4,209	4,306	3.8%

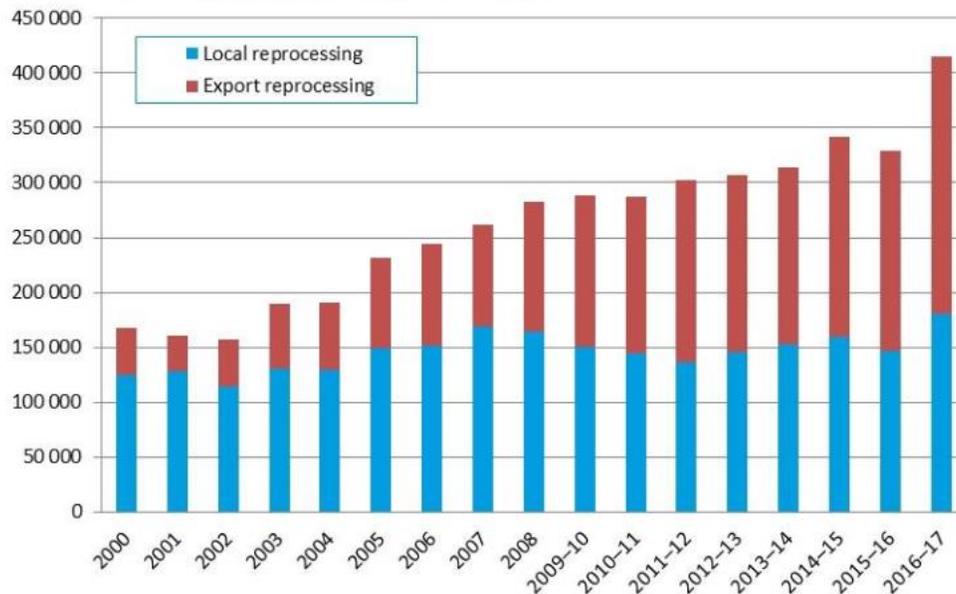
Data table for Figure 19 Exports of waste materials for recycling by type from Australia to China, 2006-07 to 2017-18

Kilotonnes

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	CAGR
Metals	255	471	846	580	459	558	432	236	232	174	203	156	-4.4%
Plastics	94	113	190	137	141	155	138	108	130	144	125	27	-10.7%
Paper, card	648	910	916	1,173	1,060	1,108	1,188	1,067	938	996	920	562	-1.3%
Other	2	18	1	1	2	11	3	2	2	2	3	3	2.2%
Total	999	1,512	1,953	1,891	1,663	1,833	1,760	1,414	1,301	1,316	1,251	748	-2.6%

(Blue Environment Pty Ltd, 19 November 2018)

Figure 2 – Annual Australian plastics recycling 2000 to 2016–17



(O'Farrell, 2016-2017)

As an integral part of the circular economy loop of plastic waste, the recovery rate of plastics, as can be seen in the table below, is a systemic issue requiring improvement across all sectors of government, industry and community. As the table below indicates, at 13% nationally it represents 87% of plastic resources being lost to the local economy in raw materials, value-add manufacturing and labour. Studies have demonstrated repeatedly that for “every one job involved in landfill and 10,000 tonnes of waste, over four are created by resources recovery’. (The Senate, June 2018). See Appendix Three for the complete extract from the Senate Report in 2018; “Never waste a crisis: the waste and recycling industry in Australia” for the submissions from contributors in the waste industry, recyclers, local governments relating to the domestic markets and the development of supporting infrastructure to create a sustainable circular economy.

Data for Figure 33 Resource recovery and recycling rates for core waste by material category, 2016-17

Material category	Energy recovery rate	Recycling rate	Recovery rate
Ash	0%	43%	43%
Glass	0%	57%	57%
Masonry materials	0%	72%	72%
Metals	0%	90%	90%
Organics	10%	52%	62%
Paper & cardboard	6%	60%	66%
Plastics	1%	12%	13%

(Blue Environment Pty Ltd, 19 November 2018)

THE WORKSHOPS

Low recovery rates contribute to single-use plastic pollution as well as other plastic waste pollution requiring proactive strong leadership to implement sustainable behavioral, industrial and waste collection change. Considering the larger issues, the workshop participants have responded to the Issues Paper with the following suggestions:

- higher taxes or levies on single use items rather than just placing a blanket ban,
- education in all schools and community groups,
- introduce legislative instruments such as;
 - the container deposit scheme,
 - landfill levy increases from \$75/tonne,
 - a tariff placed on virgin plastic products at the manufacturing part of the cycle,
 - tax manufacturers of products made from less recyclable plastics (eg grades 3-7 types of plastic),
 - all plastic product manufacturers must design packaging to be recycled and support the recovery infrastructure,
 - tax on export waste and reduction of taxes on imported recycled plastic products,
 - government and business procurement policies adjusted to embed the preferred use of recycled products in all contractual negotiations,
 - sign up and commit to the New Plastics Economy Global Commitment. <https://www.ellenmacarthurfoundation.org/news/spring-2019-report>
- increase funding for education on all plastic recycling including the bio-organics and 3-7 plastics,
- develop an online platform showcasing the lifecycle of various products,

- develop a labelling system for all packaging that is clear for all consumers,
- define timelines and realistic measurable targets for policy implementation and legislative changes allowing for stakeholders to have a transition period,
- develop reprocessing infrastructure locally creating jobs, encouraging secondary industries and create a transparent supply chain of plastic waste,
- local governments to offer households and businesses cheaper Council rates if the landfill reduction targets are met as a collective,
- build refillable water stations into all public spaces,
- proactively build the demand for recycled consumer products, and
- examine the choice architecture that is created for consumers in retail environments.

Taking into consideration some of the suggestions as well looking further afield it is revealing to see what other jurisdictions are doing and the metrics of waste generation and end of life cycles they have created. Second only to the U.S, Australia generates 1976kg of waste per person annually, with 36% being disposed of, 62% being recycled (offshore) and 2% used for energy recovery. The 62% which is currently recycled by shipping offshore represents 4,306,000 tonnes shipped offshore in 2018.

Data for Figure 34 Comparison of annual waste generation and fate per capita, Australia and selected OECD countries (excluding hazardous waste, ash and landfill gas energy recovery)

Kg per capita

Country	Disposal	Recycling	Energy recovery	Generation
Australia	738	1,230	8.16	1,976
Denmark	74	1,253	479	1,806
Norway	401	755	700	1,856
United Kingdom	414	1,227	26	1,667
United States	1,283	1,138	105	2,525

(Blue Environment Pty Ltd, 19 November 2018)

The use of legislative instruments in a “carrot or stick” capacity was a common theme running through the workshops and through the Senate Report 2018. One suggestion, in particular, was expressed multiple times, being landfill levies. In the Senate Report, the benefits were submitted as beneficial outcomes of waste levies, namely:

Mr Tony Khoury, Executive Director, Waste Contractors and Recyclers Association of NSW, (WCRA), told the committee that the waste levy in New South Wales has 'done many positive things' for that state. Mr Khoury explained that:

...we've seen a lot of investment in recycling because of the waste levy. There are many facilities that now operate because of the waste levy.

(The Senate, June 2018)

THE ACTION PLAN SOLUTION

- Make the achievement of a circular economy the top priority aligned with SDG12.
- Shift the position of the regulators from being in a reactive state to adopting a proactive state with a stronger leadership position.
- Develop a sustainable appetite for recycled products by all sectors to drive the demand for infrastructure.

When considering plastic waste management with The United Nations' Sustainable Development Goals (SDG12), there are key business themes which are aligned with WA's Waste Strategy and are applicable:

- Sustainable sourcing
- Resource efficiency of products and services
- Materials recycling
- Procurement practices
- Product and service information and labelling

(SDG Compass, 2016)

The consideration of the SDG's, particularly SDG12 which provides key business actions and solutions regarding waste as;

The below examples are non-exhaustive and some may be more relevant to certain industries than to others.

- Implement product portfolio analysis tools to understand environmental and social footprint of products within lifestyles as well as production. Innovation must align products and applications to appropriately address sustainability megatrends.
- Develop innovative business models such as moving from selling products to selling services, to retain ownership of the products and help close the materials loop.
- Enable sustainable consumption by developing innovative solutions can reduce energy need in usage and educate consumers about these benefits.
- Reduce manufacturing impacts by substituting virgin raw materials in products with post-consumer materials through recycling and upcycling.
- Apply modular design, so products' constituent parts will be easily separated and either re-used without further processing, or easily recycled near the point of disposal.
- Significantly reduce waste and ensure that any unavoidable waste is utilized to the fullest degree (e.g. organic waste as fuel or fertilizer).

(SDG Compass, 2016)

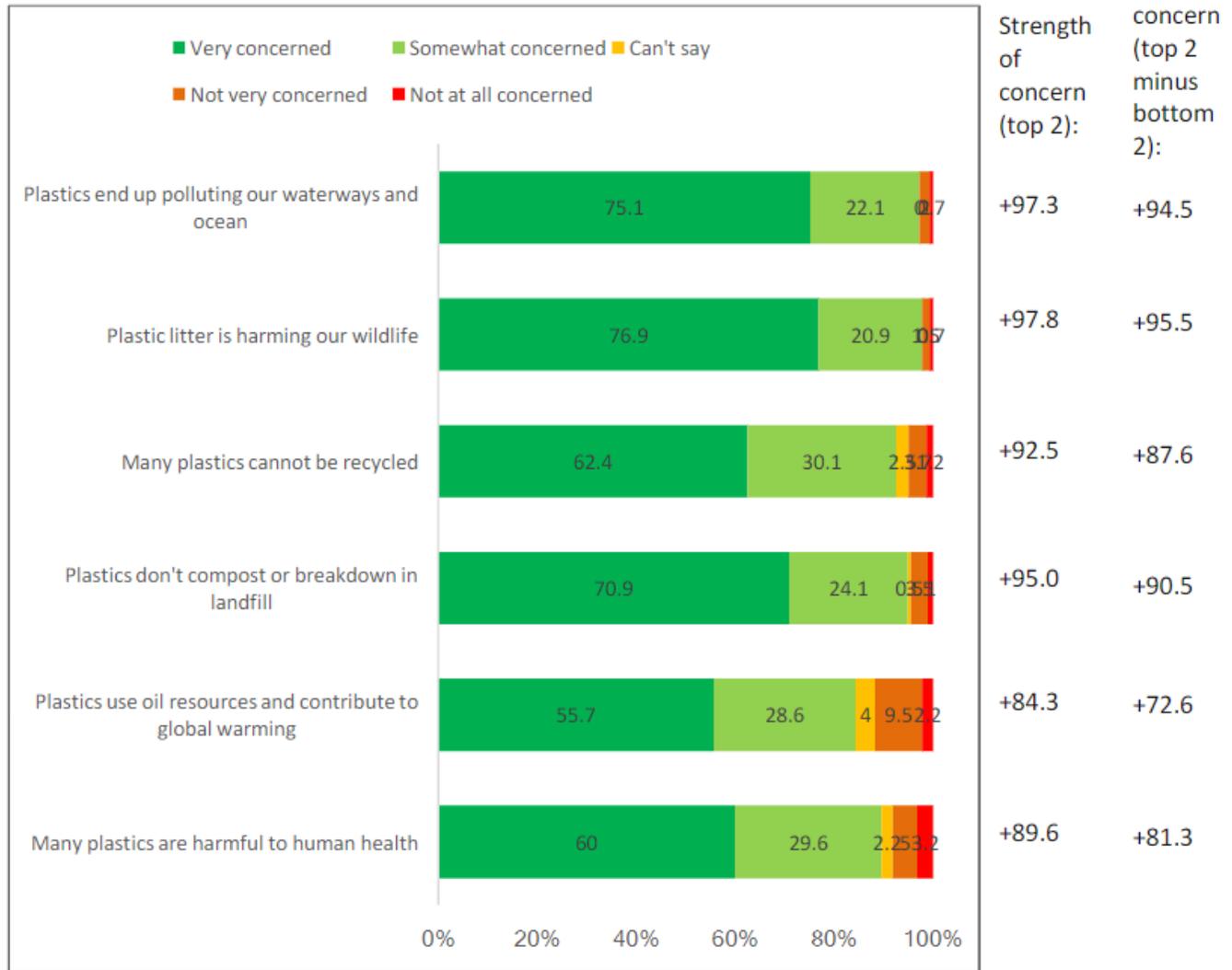
Appendix

Appendix 1



Plastic Waste Survey of WA Households 2017

Figure 3: Strength of community concern regarding plastic products and waste



(Ashton-Graham, 2017)

Appendix 2

Department Premier and Cabinet

POLICY: REDUCING THE USE OF DISPOSABLE PLASTIC

Number:2018/03

Issue Date:12/11/2018

Review Date:30/06/2021

This policy seeks to significantly reduce the amount of single use plastics procured by State Government agencies. It aims to support agencies to make better purchasing choices through the integration of sustainability in the procurement process.

Appendix 3

Extract from the Senate Report 2018; “Never waste a crisis: the waste and recycling industry in Australia”

Domestic market and circular economy

5.60 In response to the lack of domestic markets for recycled content and the crisis caused by China's National Sword policy, multiple submitters argued that recycling in Australia needs to transition away from being export-focused to an industry that supports waste being processed and reused to make new products domestically.

5.61 Submitters stated that the most effective way to transition away from an export-focused industry was by the establishment of a circular economy in Australia. A circular economy is an alternative model to the traditional linear economy which is based on 'take, make, use and dispose'. It is a self-sustaining system founded on the principle of keeping material resources in use, or 'circulating' for as long as possible. It is designed to extract the maximum value from resources while in use, then recover and regenerate products and materials.⁷¹

5.62 Mr Max Spedding, Chief Executive Officer, National Waste and Recycling Council (NWRIC), noted the current rate of growth in waste production and stated: “If waste continues to grow at 4½ per cent per annum, which is currently what it's doing, and rises from the current 55 million tonnes, by 2040 Australians will generate 138 million tonnes of solid waste. Assuming that recycling, the national diversion, continues at 75 per cent, our recycling capacity we will need to increase by 400 per cent by 2040, which is an enormous amount.”⁷²

5.63 Mr Spedding, NWRIC, argued that this situation can only be remedied through the alignment of 'waste management planning, regulations and procurement practices to quickly transition the sector to a circular economy'. Mr Spedding noted that a circular economy would focus waste management on the recovery of materials rather than landfill and that 'an early transition to a sustainable circular economy is required to meet the challenges of increased waste volumes'.⁷³

5.64 The committee heard that circular economies are implemented in other jurisdictions, and that there are both environmental and economic benefits of transitioning to such a system. Ms Sloan, WMAA, told the committee that: “I submit that Australia's being left behind the rest of the developed world in transitioning to the circular economy and using waste commodities as a resource, with the effective

closure of China as a market for Australia's commodities, it's vital that the Australian government works with industries to create a circular economy in Australia and develop onshore local manufacturing. The added benefit beyond the environmental good of moving to a circular economy is increased job creation. Studies have found repeatedly that, for every one job involved in landfill and 10,000 tonnes of waste, over four are created by resource recovery.”⁷⁴

5.65 A number of suggestions were made to encourage domestic markets including mandating the use of recycled product in manufacturing, and the provision of government funding. For example, Mr Spedding, NWRIC, suggested that landfill levies could be used to stimulate the creation of domestic markets for recycled material. As noted in Chapter 4, Mr Spedding also suggested that landfill levies should be used to provide low-interest loans to the recycling industry, modelled on the Clean Energy Finance Corporation's approach.⁷⁵ In addition, the NWRIC supported the use of the Emissions Reduction Fund (ERF) to support greenhouse gas reduction initiatives, land for gas recycling and material efficiency.⁷⁶

5.66 Mr Mark Venhoek, SUEZ Australia and New Zealand advocated for the Australian Government to mandate the use of recycled material in producing new products. Mr Venhoek stated that currently, the manufacturing industry is hesitant to invest in the use of recycled material but that if it became mandatory then 'those investments will automatically come'.⁷⁷

5.67 Mr Venhoek told the committee that in other countries, government policy has required that infrastructure be created to support the pre-treatment, treatment and re-manufacture of recycled material. Mr Venhoek explained: “In Germany, for instance, there is a semi-government organisation that developed the dual system, or the green dot system. While they were tendering for the collection and processing of all materials, they said: 'Everything needs to be processed within our country boundaries. We are not there to have any kind of materials leaving our country and being treated in India or in China or anywhere else in the world.’”⁷⁸

5.68 Mr Venhoek noted that as a result, Germany's dependency on exporting recyclates outside of Germany has now dropped to almost zero.

67 Mr Terry Van Iersel, SKM Recycling, Committee Hansard, 20 November 2017, p. 37.

68 Mr Mark Venhoek, SUEZ Australia and New Zealand, Committee Hansard, 14 March 2018. See also Mr Jim Corrigan, ACT Government, Proof Committee Hansard, 21 March 2018, p. 11; Mr Kane, Visy Recycling, Committee Hansard, 20 November 2017, p. 29.

69 Mr Terry Van Iersel, SKM Recycling, Committee Hansard, 20 November 2017, p. 37.

70 Mr Peter Shmigel, Australian Council of Recycling, Proof Committee Hansard, 30 April 2018, p. 25.

71 Southern Metropolitan Regional Council, Submission 59, p. 1.85

72 Mr Max Spedding, NWRIC, Committee Hansard, 20 November 2017, p. 1.73 Mr Max Spedding, NWRIC, Committee Hansard, 20 November 2017, pp. 1–2.74 Ms Gayle Sloan, WMAA, Committee Hansard, 14 March 2018, p. 12.75 Mr Max Spedding, NWRIC, Committee Hansard, 20 November 2017, p. 8.76 Mr Max Spedding, NWRIC, Committee Hansard, 20 November 2017, p. 1.

Appendix 4

WORKSHOP COLLATION ONLY.

Appendix

Workshop One Tuesday 25th June 6.30-8pm.

Attendee: 24

Demographic: mix of ages and genders

- 1.) COMMUNITY
 - Positive Reinforcement
 - Recycling bins in community spaces

- B.Y.O packaging premises/labelling restaurants
- Job seekers work for environment
- Advertise achievements and positives
- Make it easy and approachable
- Standardise local governments recycling programs
- Pool resources, 'One Stop Shop'
- Environment app
- Displays and examples
- Clearer recycling plastic system
- A clearer identifying symbol
- Community drop off points ie. Local shopping centres
- Environmental app where I can buy things in my own containers etc?
- Community service collections, recycling
- Bring in transparent bins to shame non recyclers
- If recycling economy existed in WA, individuals recycling could be advertised as creating jobs for WA recycling workers
- Education schemes to improve consumer behaviour
- Standardized clear approach for 3 bin system
- Recycled plastic on packaging
- Affordable plastic free/plastic reduced food options
- 100% of waste reprocessed here in WA
- Supporting home composting/ encouraging home composting
- More affordable community bulk food and zero waste stores
- School programs- even outside of school programs
- Options to easily change to other options
- Pricing of loose products to be cheaper than prepackaged options of the same item
- Education
- Community pressure to: eg. remove plastic bags at fruit or veg departments, remove black plastic trays in supermarket meat departments
- Alerting departments to their over use of plastic
- More information
- Consumer behaviour
- Education at schools through social media
- Places to recycle computers, batteries etc.
- Extra money for takeaways packaging
- Community run events on selling recycled goods or providing education on how to use waste
- Community newspapers showcasing local recycling/energy efficient citizens
- Start recycling programs in your own workplace
- Education in schools in a way that changes the current mindset of convenience over environment
- Ask strata companies and councils of owners at apartment complexes to promote recyclable collection
- Ask restaurants, food trucks, cafes,bars and takeaways if their packaging is made from recycled material
- Use recycled materials for building- fences, roads, play equipment!
- Ask retailers to use PET/HDPE plastic packagings - for their products
- Provide info to households regarding what can be recycled, how to dispose of it and where??
- Recyclable fast food containers
- Butchers - take own containers, don't use meat trays/plastic
- Ban PVC - drink containers use PET only

- Primary schools collect any recyclables that could earn money and use as fundraising tools
- Share “feel good” stories on social media about personal waste production
- Community gardens use initiatives for people to drop off and get incentives
- Local community drop off services- ewaste, clothing, materials

2.) GOVERNMENT

- Incentivise reprocessing plant
- Reduction on the triangular arrow symbols
- Industry incentives to change to recyclable materials
- Government establish a plastic recycling plant or provide grants to industry
- Transparency about conflict of interests
- Money for investors in local reprocessing plant (or give all of it)
- More accessible Redcycle - home bin/council collections, and more education that it is an option
- Incentives for bigger companies to change and fines/additional taxes for those who don't
- Glass bottle/jar deposit return system for reuse
- Program for local communities to be able to assist in a greater capacity
- Reduce, eg. coffee cups
- Local government action-need to be proactive in recycling/processing collection at local level eg. in small towns, rural areas
- Education on waste, awareness
- Educate the public
- Top down approach legalisation
- Big picture long term thinking
- Reduce job vs environment conflict
- Legislate for change
- Proof of cost of inaction
- Will of media and support
- Fine industry, tax businesses- make EVERYONE pay for their waste
- Make the hard decisions for the future now!
- Get a sense of urgency about this issue!!
- Job growth incentive in repurposing
- Lead by example - buy repurposed items in government buildings
- Learn from others
- Keep it simple
- Sustainability targets by industry sector/incentives
- Advertise the bad not good
- Tax breaks on companies that buy 100% recycled products eg. Redcycle
- Tax on waste
- Connecting environment to individuals eg. extinction crisis
- Tax on waste
- Laws to regulate how the products are recyclable
- Recycling bins in all public places - parks, beaches, shopping centres, share cost with industry
- Utilise school workplace/centrelink workplace for industry and provide incentives
- Listen to our youth!!
- MAKE IT A PRIORITY!!!
- Future planning before landfills FILL

- Make other types of recycling bins more available and free
- Make lifecycle quality policies
- Pricing- subsidise recycling industries
- Make it mandatory to make nonrecyclable products more expensive
- Households rewarded for producing low amounts of waste and energy
- Bring in consistent bin signage instructions
- Government advertising and sponsoring REDcycle, Total e-waste, Greenbatch and other recycling initiatives
- Laws about which types of packaging can be used
- Legislate selection criteria for Minister positions eg. Environment Minister needs relevant degrees and experience
- Import taxes for products made of more than 50% virgin material
- Create a government trading enterprise for recycling and reprocessing
- Tax incentives or grants for businesses to employ an Environmental Sustainability champion with a relevant degree to lead organisational change towards recycling KPIs set by Government. Targets should be individually set for each business and revised each year, as no one size would fit all.

3.) INDUSTRY

- Ways to make thermal depolymerisation economic
- Industry to use more understandable recycling symbols
- Participate in incentives to encourage use of recyclable plastics
- Government to legislate so level playing field
- Numbers of plastics 1 and 2 etc. legislate so industry all have to make them readable/certain size
- Research grants with universities - with transparency
- Definition standards for biodegradable
- Legislate across industries. Provide options that can be rolled out in stages - so the community can be educated on the way
- Incentives for different companies to partner up with other support companies that can assist with recycling
- Advertising the three R's
- Total green recycling
- Lots of research
- Recycling labels on packaging needs to be bigger so people aware they are there
- Standards for claiming "biodegradable"
- Product categories - long lasting, low energy, recyclable, very visible on all products
- Different industries working together for efficient logistics
- Pay attention to public via social media
- Start recycling industry in WA
- Recycled/recyclable company accreditation
- Switch from glass/aluminium to recycled/recyclable plastic where ever possible
- Be more accountable for their waste
- Take back their empty containers
- Only supply containers that can be recycled - BAN others
- Heavy promotion and support of recycle/reprocess companies eg. Total Green Recycling
- Tax heavy polluters to landfill
- Reduce costs of composting facilities to encourage more use

- Government incentives for industry to reuse/repurpose
- Industries that use own initiative to be rewarded with tax breaks
- Sell reusable products cheaper, and make it know eg. recycled and compostable packaging
- Make buying 'virgin products' unattractive
- Incentives
- Subsidies for profitable reprocessing
- Increase consumer products on manufacturing
- Accountability
- Legislate to use only recyclable plastics eg. 1 and 2
- Taxes for waste
- Champions in industry
- More leadership from interested party
- More transparency
- Environmental offices
- Increase awareness and education

Workshop Two: Thursday 27th June 10a-11.30am

Attendees: 22

Demographics: Predominantly women and between 25-60yrs

1.) COMMUNITY

- Simplify so less choice. All packaging is recycled not just recyclable. A levy on new plastics, ban all single use plastics - levy would make recycled goods cheaper goods cheaper , and consumers will respond positively
- Lower cost of products, produce and meat with recycled items to incentivise circular economy
- Demand increased pressure on government by community
- Local solutions
- Remove gender bias ' Not women's work only!'
- Remove individual/consumer focus-remove 'I' replace with 'We!'
- Every plastic to be clearly labelled to be recycled
- Engaging community
- Educate
- Boomerang bags
- Make recycling convenient
- Incentives for bringing your own takeaway containers or vessels to keep bulk food products
- Education and awareness/transparency
- Monetary incentives for bringing back packaging to be recycled
- Increased convenience in supermarkets/shops
- Personal habit changes lead to collective change
- Transparent bins?
- Public forums
- Increased transparency of where our plastic is going
- Provide increased info on where soft fall plastics can be recycled (eg. REDcycle drop off points at supermarkets)

- Increased community awareness of what can/can't be recycled in their council - currently rather difficult to figure out what is/isn't recycled. eg. New guidelines say you cant recycle coffee cups but there is recycling symbols on coffee cups
- Reinforcements of values (through Pd., meetings etc.) to improve community coherence
- Unification of community recycling practices eg. consistent bins and attitudes
- App or system implemented by local government
- Community goals
- Community competition - best recyclers!
- Outlet for ideas, questions and suggestions
- Art/programmes/engineering/science
- More protesting
- Enable food waste apps- sharing compost apps
- Local workshops
- Facebook/buy nothing groups
- Seeing recycled items as fashionable
- At home system to help easily sort
- 1 and 2 plastics recycling bins
- Takeaway operators using keep cups/packaging - BYO packaging
- Have your own backpack with coffee cup, water bottle, cutlery, plates that you get a discount for bringing
- Retailers getting certified tick of approval, 'Friends of Greenbatch' package- retailers can display sticker
- More places in public places/parks/CBD to collect plastics
- Plastic Free July- plastic free each month with a target
- Social media, Greenbatch and individuals
- Living Smart education in community
- 'Friends of Greenbatch'
- Discounts for BYO
- Supermarkets provide produce bags
- Coffee cup hiring system
- No-plastic supermarkets
- Marketing- Buy nothing sites, Facebook groups
- Workshops for adults
- Promote green living
- Financial incentives

2.) GOVERNMENT

- Be brave
- Choice architecture
- Educate- with the will of the people the premier could be passionate
- You would be re-elected!
- More economic control
- Better education re plastics vs others
- Fund a processing plant
- Innovate
- Global leadership and science

- Employment opportunities - design, science, sorting, collections, process, educators, market circulation
- Tax the worst types of plastic
- Stop thinking in election cycles
- Innovate rather than follow
- Lead by education and vision then follow by passion for creating
- Culture of showing we care, consumers are responsible
- Create jobs
- See rubbish as a resource
- Subsidise recycled products in supermarkets
- Levy on virgin plastics
- Investment in education programs in schools
- Promotion of programs designed to educate and change mentality - change 'the norm', socially acceptable behaviour
- Legislation against non-recycled and hard to recycle packaging
- Supermarket regulations
- Tax companies that don't recycle
- Incentives for use of recycled products
- Protest more
- Average person doesn't know what government can do, or how to get them to do it - less protesting
- Education - school programs, make it normal for younger generations
- Look at bottom up methods, ownership and empowering people
- Follow countries that are ahead in their thinking
- Funding a reprocessing plant in WA
- More taxes on plastics that can't be easily recycled
- Education programs

3.) INDUSTRY

- Reprocessing plant necessary now!
- People pressure or legislation which is more effective?
- Levy on virgin plastic
- Legislation Unity Bin systems worldwide not only Australia!
- Industry reusing products - reduce construct costs for companies
- Industry funding for reprocessing plant ie. CCA
- Levy on virgin plastic packaging
- Tax deductibility for investing in reprocessing plant
- Science based solution ie. best plastic type to use
- Responsible for the waste they produce
- Government Legislation
- Government to help retool the factories for different plastics
- Expand CDS to cover more plastic items
- Regulation is essential
- Only use two types of plastic- PET and HDPE
- Levy on original new plastic packaging
- Tax on producers to make material recovery economically viable for industry
- Tax by volume
- Provide economic incentives to industry

- Reprocessing plant
- Tax by volume/type of packaging
- Start the refill of original bottles
- Responsibility
- Funding stimuli- economic incentives program
- Standards
- Making industry aware of the benefits that come with being more sustainable - lower cost, increased profits, more customers, differentiates their products from others?
- Encouraging standards like ISO
- Benefits of reprocessing - jobs, improve local economy
- Establishing reprocessing facilities
- Industry awareness - education of manufacturers on impact of plastics
- Repair standards
- Certificate system for maintaining level of recycled material? Production, recycled material
- Inspire innovation - government grants
- Incentives for 'repairability', spare parts

Workshop Three Saturday 29th June 9am-10.30am

Attendees: 36

Demographics: Professional, industry and diverse age group.

1.) COMMUNITY

- Solve issue at the source eg. create economic environment that solves the problems rather than making the individual consumer/household to sort eg. into 8 categories etc.
- When I sort my waste I want to see where it goes and know that it is being recycled
- Make sorting commonplace - public places, schools, stadiums etc.
- Make it easier for me to choose recyclable products
- Make recycling visible
- Evidence of benefit from consumer participation - tangible evidence, will renew hope and trust in the process
- Central community recycling (recycling stations in locality) - lowers carbon emissions from transport and encourages community participation
- Workplaces being supported (financially) to have more recycling options
- Transparency and traceability of the collection, processing and sorting process
- Making our voices heard
- Choice architecture
- Informing people about products, using recycled or recyclable products, influencing consumer habits
- Make it convenient
- Education
- Council to pick up soft plastics and 1 and 2 plastics
- Restaurants, cafes, schools - no single use plastics
- Soft plastic recycling for industry
- Healthcare - consider infection control vs plastic moderation
- Transparent procurement decisions at local government level/ schools/ services
- App for knowing what plastic

- Compulsory washing machine filter (for micro-plastics)
- Labelling packaging - Public needs an easier more visible “health rating” (how easily it can be recycled) on packaging. And that darn triangle needs to be on ALL packaging and more easily readable
- Certificates and standards
- Use recycled materials for public infrastructure- playgrounds, bicycle parking, bollards
- More community and workplace recycling, including “buy back” schemes
- More education - too much crap in recycling bins, poor awareness of things that can’t be recycled, more funding
- Make product information accessible to consumers
- Empowered to influence your community including your workplace
- Education consumers
- Labelling - certificate of biodegradable or compostable
- Transparency at a local level - in my waste chain. Understand where my waste us and how it is being recycled so I know how to recycle effectively.
- Create homes/push designs around sustainable housing designs that encourage effective/economical waste management processing within your home
- Recycled green procurement
- Mandatory sustainability/recycling units in schools
- Bigger soft plastic collection depots, not just the REDcycle bins at Coles and Woolworths
- More supermarkets/shopping outlets where you can bring your own containers
- Education driving awareness
- Policy reform via public workshops
- Best in class recycling facility
- Driving consumers to not buy things unnecessarily
- Stores (bulk stores) to buy things by bringing your own packaging
- Making manufacturers pay a levy for the waste that they are creating
- Renting and repairing
- The public should be paying levies for non-recyclables
- Education
- Councils should be more proactive with the public
- Go to schools to teach the younger people for the future, the younger people (children) will influence the older generation
- Streamlined plastic packaging, packaging tax on plastics
- Glass collection and washing of bottles and standardised bottle sizes
- Regulation on biodegradable packaging
- Be able to get organic produce from major supermarkets in bulk
- All fruit and vegetables at supermarkets unpackaged
- No packaging that can’t be collected in WA kerbside bins
- Cafes that sell biodegradable products must collect it for it to be taken to commercial composter
- Local collection points for recyclables so we can separate at source with people there to help sort, get rid of kerbside recycling bins
- Curriculum- there is no “AWAY”, embed deep understanding about linear economy at schools
- Issues with “biodegradable”, misinformation
- Promote initiatives like ‘share-waste’-composting in your neighbourhood
- Regular interesting, engaging workshops
- Clear information from council about what can and can’t be collected in kerbside bins

2.) GOVERNMENT

- Mandatory recycling units in schools
- Lead by example, no single use plastics in government house etc.
- Weigh public's bins, tax heavier red bins
- Build a reprocessing plant!
- Invest in Greenbatch!
- Introduce legislation against limited-lifecycle products, eg. washing machines, printers etc.
- Create a culture of repair
- Fund a best in class recycling facility
- Incentivise cleanup initiatives eg. ocean plastics
- Incentivise green technology eg. alternative products, data capture and modelling
- Advertising
- Interpreting environmental studies as part of a subject in schools
- Put a tender out to solve the problem of a certain budget
- Government should spend its money on research to recycle and start a plant for all types of recycling. Money to be spent on sorting different products (using) barcodes.
- Government should build and own plant so it can be modified to improve the process - not profit. Will vote to get government to start, the public.
- Advertising campaigns
- Track where leakages are in recycling program
- Think big picture for the reprocessing of all materials
- Barcodes on all products for recycling and where the paper/plastic/glass comes from
- Prioritise waste
- Find \$20 million and build a plant
- Look at other countries and compile what's best
- All government offices and public places should model best practice waste minimisation and collection practices eg. not have single use packaged products, have compost and soft plastic bins.
- Kerbside landfill bin weighing - charge for contamination
- Do a survey of best waste practices around the world eg. Europe, could do a university study
- Waste minimisation and regenerative lifestyle, practices taught in schools - part of Australian curriculum
- Government owned recycling, sorting and reprocessing facility rather than companies selling our waste overseas
- Increased advertising
- We don't need to reinvent the wheel - follow the lead from other countries
- Collect data and use information to demonstrate opportunities re: economy env.
- Story telling for education
- Australia as a GLOBAL LEADER in protecting the environment
- Leadership eg. Jacinta Arden
- Learn from EU etc., examples of economic growth opportunities from circular economy, lean on success of public health campaigns like anti-smoking
- Inclusion - everyone along for the journey
- Invest in a WA processing plant/s
- Education around reusables/recycling and circular economy
- Levy on plastic packaging
- Put the onus on industry to create good practices and enforce habits for a sustainable future
- Give incentives for recyclable products

- War on waste and single use plastic bag ban- why did government push for it? Can we repeat that strategy?
- Incentive for manufacturers to use recycled products
- Industry talking to government to help them meet their needs in environment
- Economics of manufacturing: tax deductions, create laws to encourage manufacturing industry to use recycled materials
- Legislation reform
- Business incentives, tax relief
- Education programs
- What influences decision making? Economy, stakeholders
- Sorting and washing: jobless people on centrelink have to “volunteer” a certain amount of time to sort plastics and clean up beaches and natural areas
- Funding equipment industry
- Virgin plastic tax
- Fund TV ads to educate public, why we should care and how we can make a change
- Ads for education/ awareness
- Challenge Uni students: outdoor programs/Department of Wildlife, stimulate INTRINSIC drive-why should I care?, empower, educate, support research and development
- Support Start-ups: their research and development, local manufacturers, local businesses
- Infrastructure, investment, legislation
- Provide funding to set up at least one recycling plant
- State government: education campaign, state of the problem, challenge “your right” to pollute compromises the right to a clean environment
- Legislate
- Local government introduce a price structure for household waste - cheaper rates for less waste
- Clarity on process
- Acknowledge problem
- Education for community and industry, advertising campaigns, graphics on bottles of the final outcome?
- Industry incentives for using recycled plastic - tax breaks, ‘anti’ levy, brownie points (endorsement awards)
- Help community to separate recyclables for collection
- Cap amount of virgin plastic produced
- Consistency across all the local councils - state government takes leadership
- Legislate to make recycling of many different plastic types easier
- Follow a circular economy
- Action plan: collective action - government, local, state etc., Reporting collections (annual reports against the plan), tracking, financially supported by government
- Show leadership, acknowledge will
-

3.) INDUSTRY

- Reward industries who increase their recyclable products eg. Awards
- Highlight companies who provide paper refuse bags and other products
- Industry could set up artistic/creative endeavors eg. “Wearable Art”, school kids annual projects - opportunity to advertise environmental awareness
- Logistics solutions - not having to put packaging into landfill if there’s other solutions
- Standards in plastics

- Research and development
- What would it take? Setting a new benchmark (even with one manufacturer) to drive competition in marketplace
- Co-fund recycling Facilities (partnership between government and industry), industry approach government
- Diversify business to ensure they can cop the blow when bans come in
- Industry needs to be taxed on virgin plastic use/incentive to use more recycled plastic
- Enforce industry to make their policies with regard to packaging public domain
- Government to help industries by putting money into research programs including universities
- Put more money on the ground not into consultancies
- Do not incinerate, start a plant to recycle all aspects and as it's working it can be improved
- Put WA into the forefront and export (it is trial and error)
- The government should subsidise from levies from the public
- Charge on virgin oil, paper, glass
- Producers bound by lifetime product warranty
- Help oil companies turn into reprocessing companies
- Charge a packaging tax for retail, food, building industry, medical. Higher tax for things that are harder to recycle
- Producers accountable for incorrect disposal of products- straws in ocean
- 100% of products recycled in Australia
- Extended producer responsibility- takeback and recycle their own products
- All single use medical waste must be collected for recycling
- Transparency on where recyclables go and information on what the items sent overseas get turned in to
- Require single use items to be made from recycled plastic, paper
- Recycle and manufacture all single use items in Australia
- Producers have to detail how much of their product is made from recycled materials on the packaging so consumers can make informed decisions (like energy star rating)
- Renewable energy
- Community education campaigns e.g. posters, activities, 'road show' type education to both metropolitan & rural communities. Many people don't necessarily realise the extent of plastic or of alternatives available e.g. using balloons to advertise an open day Vs earth friendly alternative
- educate businesses to plastic alternatives e.g. posters etc
- tick of approval symbol on recyclable plastic/glass/recyclable metals - has to be big enough to see, not placed in a corner or obscure position on the item
- make non-recyclable / difficult to recycle plastics more expensive or recyclable plastic cheaper
- even better, make easily recyclable containers etc cheaper e.g. glass
- make the numbering system for plastics bigger - often need a magnifying glass to see the numbers on the bottom of containers
- Local governments - provide water filling stations in high traffic areas to encourage the use of refillable bottles. Already done in limited way by some local councils, should be expanded
- ban plastic bags in fruit & vegetable shops/departments of supermarkets
- ban plastic wrapping fruit & vegetables completely - don't know why anyone would want their bananas plastic wrapped anyway :-{

From: [Dr Indre Asmussen](#)
To: [Plastic Action](#)
Subject: Single-Use Plastics in WA Submission
Date: Thursday, 4 July 2019 11:10:11 AM

Dear Manager,

I would like to point out that European countries have reduced plastic use for decades. We are not reinventing the wheel. We need to reduce packaging used. This requires changes by industry and potentially legislative change.

Also in coastal erosion we use geotextile sand bags these are made from polyester or plastic and will break down into plastic particles and add to the plastic loads in the ocean.

We also need to look at our clothes - every time we wash polyester and other fabrics we create small plastic particles. Choose natural fibres.

Shop wisely to change products through demand.

Choose natural fibre over plastic in all possible options and demand non-plastic things -ie take away containers etc.

Best wishes

Dr Indre Asmussen

Thank you.

Yours sincerely,

Dr Indre Asmussen

This email was sent by Dr Indre Asmussen via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Dr Indre provided an email address [REDACTED] which we included in the REPLY-TO field.

Please reply to Dr Indre Asmussen at [REDACTED]

To learn more about Do Gooder visit <https://aus01.safelinks.protection.outlook.com/?url=www.dogooder.co&data=02%7C01%7Cplastic-action%40dwer.wa.gov.au%7C8ec5581a9fa8453f395e08d7002d1f03%7C53ebe217aa1e46feb88e9d762dec2ef6%7C0%7C0%7C636978066110541512&data=c1MEBrtAHuJPIquSuynBLy1gIvMVJyoF%2BC1EOScPjSA%3D&reserved=0> To learn more about web protocol FC 3834 visit: <https://aus01.safelinks.protection.outlook.com/?url=www.rfc-base.org%2Frfc-3834.html&data=02%7C01%7Cplastic-action%40dwer.wa.gov.au%7C8ec5581a9fa8453f395e08d7002d1f03%7C53ebe217aa1e46feb88e9d762dec2ef6%7C0%7C0%7C636978066110551505&data=0hBneyjV5YdxLA%2FHNIjKA6xa8KH26MdiEN6DhTGr%2FfE%3D&reserved=0>

From: [Jackie Curtis](#)
To: [Plastic Action](#)
Subject: Submission on Reducing single-use plastics Department of Water and Environmental Regulation
Date: Monday, 8 July 2019 2:57:11 PM

Dear Sir or Madam,

Regarding : The Small plastic dots that are stuck on to every single piece of fruit and some vegetables.

While there has been a lot of focus on many single use plastics, I have not noticed any mention on the small plastic sticky dots that are attached to almost every piece of fruit and some vegetables.

There are *millions* of them, and they are just so small they cannot be recycled - some end up in the garbage, some in compost, some in the streets and in recreation areas like beside rivers and seashores, ending up polluting our earth and our waterways.

I assume these dots are for identification, but if the fruit and vegetables must have these dots on them, one solution would be to *ensure that they are made of paper, which can at least break down.*

I have attached a photo of these dots.

I hope a solution can be found to this, and that the plastic dots are banned.

Thank you for the opportunity of making a comment on this very important issue.

Yours sincerely,
Jackie Curtis






[REDACTED]

From: Jacky Patience [REDACTED]
Sent: Sunday, 14 April 2019 8:08 PM
To: Plastic Action

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon,

I have completed the survey on single use plastics. I just wanted to add that WA needs to own it's own waste and build a recycling plant in WA. Greenbatch is trying hard to prove it can be done. Replas and Terracycle are companies over East that are proving it can be done. We need a Government to step up and own this problem and build a recycling plant for the future . We don't need surveys we need action now!

Regards,
Jacky Patience

Hon. Stephen N. Dawson MLC

12th Floor, Dumas House

2 Havelock Street

WEST PERTH WA 6005

Dear Minister Dawson

I am writing to express my concern at the level of litter (including building debris, plastic ties and bags) along both sides of the Swan River.

As a regular dog walker along the river through City of Perth, South Perth and Victoria Park Local Government Areas I have become increasingly aware of mounting levels of rubbish discarded both by private companies and individuals.

Some recent examples of this include hundreds (and this is a conservative estimate) of plastic ties discarded on the ground. These appear to have been used by "hire a fence" companies for musical and gardening events (South Perth and Burswood) respectively.

The other site that is an absolute disgrace and disrespectful I believe to the Noongar people for whom this part of the river (opposite Heirisson Island) adjacent to the so-called "Waterbank" development. Here amongst the hundreds of oyster shells there are huge lumps of discarded cement, building rubble, material (blown off Waterbank's fencing) and plastic.

At a time when all responsible individuals are doing their best to minimize waste and use of plastic I find the practice of these companies particularly galling.

I have written many emails to the relevant Local Councils to no avail. I think it is very sad that we live on such a beautiful river where the water is toxic and rubbish is continuously being discarded near and in it. For a site that is significant culturally to the Noongar peoples and a place where many others enjoy recreation, fishing and boating this is an absolute disgrace.

I have also often observed people from other cultures fishing in this river and I can only hope that they have read and understood the recent warnings about the levels of toxicity in the fish life.

I am at a complete loss as to the lack of interest and complacency at all levels of government with regard to this. I am writing not just to complain but to hope that you will look into this and see what can be done.

Yours faithfully

Dr Jennifer Dodd

████████████████████

██████████

██████████

From: [Karen Ekeroth](#)
To: [Plastic Action](#)
Subject: Submission to single use plastics paper
Date: Monday, 8 July 2019 4:03:26 PM

To the Department,

The issues paper is a good start but it really is time for the state government to show some leadership in addressing the plastics problem which is a current and increasing problem affecting everyone and not just a small minority. It is good to ban/tax many plastics but in addition we need to be able to reuse/recycle the many recycleable plastics containers which will still be out there as we can't ban all plastics. For this to happen, we need a plastic recycling industry in WA.

I understand that government often wants to limit their involvement and allow private industry to come up with a solution but this not just industry that would be "nice to have", it's an industry we "need" to have. It should, at least initially, be considered as a public service. I believe that in this case, government needs to be involved and offer assistance to enable some recycling start ups and entrepreneurs to move to the next level of development/production and maintain the momentum that the public awareness has created. People are getting frustrated as they learn that the plastic they are carefully "recycling" is not actually being recycled.

As an example, locally here in Perth, I've recently volunteered at an organisation called Greenbatch. So far I have observed the drive and quality of the people running it. They are made up of many people from diverse backgrounds but many are qualified and have technical and business experience and they are determined and working towards a solution. There are also many similarly qualified and keen volunteers that offer their time. Then of course there are the many members of the public who save up their recycleable plastics and bring them down to the warehouse once a month because they want them recycled.

As a member of the public and a tax payer, I would be pleased with a state government that would offer some funding assistance to such an organisation to enable them to make their processes more efficient with new equipment so that they could progress their operations on a larger scale.

Especially because technology is already available, risks are relatively low but even if there was uncertainty, it's still something that government should be helping progress, regardless, given that the risks and consequences of not doing anything are far worse.

We really need some plastic recycling to be done in WA now, so please offer some assistance to organisations who are already trying to do it with the help of volunteers and the public. The public is getting angry that all their recycling efforts are going to waste!

Yours sincerely,
Karen Ekeroth



From: [Karen Joynes](#)
To: [Plastic Action](#)
Subject: Fwd: Balloon update
Date: Wednesday, 26 June 2019 8:12:11 AM
Attachments: [Dromanapenguin.pdf](#)
[Shorncliffe June19-2.pdf](#)
[shorncliffe 3 June19.pdf](#)

Hello,

This email adds weight to the need to ban the release of balloons and the use of helium to inflate balloons in the WA plastic reduction policy.

I will forward more.

Thank you,

Karen Joynes

----- Forwarded message -----

From: **Karen Joynes** [REDACTED]
Date: Tue, Jun 11, 2019 at 10:24 AM
Subject: Balloon update
To: Dawson, Minister <Minister.Dawson@dpc.wa.gov.au>

Dear Minister Dawson,

This email has been sent to all the state and territory Ministers for Environment. You will be aware of the petition presented to the WA Parliament:-

There have been a couple of developments regarding the national movement to ban the release of balloons and the use of helium to inflate balloons.

On Tuesday 28 May, I (NBRA) and two members of PEBA met with a Senior Advisor to the NSW Minister for Environment and an EPA officer to discuss the removal of the 'up to 20' balloon release allowance. We pointed out this allowance was inconsistent with the NSW Litter Act and that community - and industry - expectations had changed since the 1990's when the allowance was introduced. NBRA and PEBA felt buoyed by the meeting, and are hopeful that the release of balloons will be banned in NSW.

We referred to the Queensland ban on the release of balloons.

On World Environment Day, a petition by Lisa Hills of Boycott Balloons Fremantle was delivered to the Western Australian Parliament, asking for the Litter Act to be amended to recognise releasing balloons as littering:

At 1:35 in:

http://www.parliament.wa.gov.au/hansard/hansard.nsf/DailyTranscriptVideo?OpenForm&Video=http%3A%2F%2F203.26.91.200%2F%2Farchive%2F20190606+-+10.00+am.mp4&vhouse=Legislative+Council&vdate=06%2F06%2F2019&vtime=10.00+am&fbclid=IwAR0-gOoV7T8OX8qDqfKiw_-TYTy87ymWaNM7xFDzkmkb6PMqsoQETqxqvkl

The photograph of a dead penguin on the Mornington Peninsula, Victoria (below), killed by entanglement in balloons in May should be enough to nationally ban the release of balloons.

Finally, a post from Save Queensland from Balloons (please see photos attached): *Helium balloons need to be banned!*

On Monday morning a concerned 4017 local retrieved a helium-filled foil balloon from one of the shelters at Lower Moora Park, Shorncliffe. Before she got a chance to pop it, it got away somehow. This local was very disappointed that this had happened but then we discovered that the balloon had been caught high up in a tree. As it happened, there was a ute close-by with a ladder on it and its owner was happy to lend his ladder and a hand. Someone else produced a pool scoop with an extendable handle and with those tools two men managed to pop the balloon so that eventually it came floating down to the ground. Foil balloons are the worst kind of all balloons as they virtually never degrade and also can short out power lines.

The release of balloons is already banned in Queensland, yet balloons continue to be released as helium is easily accessible. A national ban, or at least severe restrictions, on the use of helium needs to be implemented, to ensure there are no accidental releases of balloons.

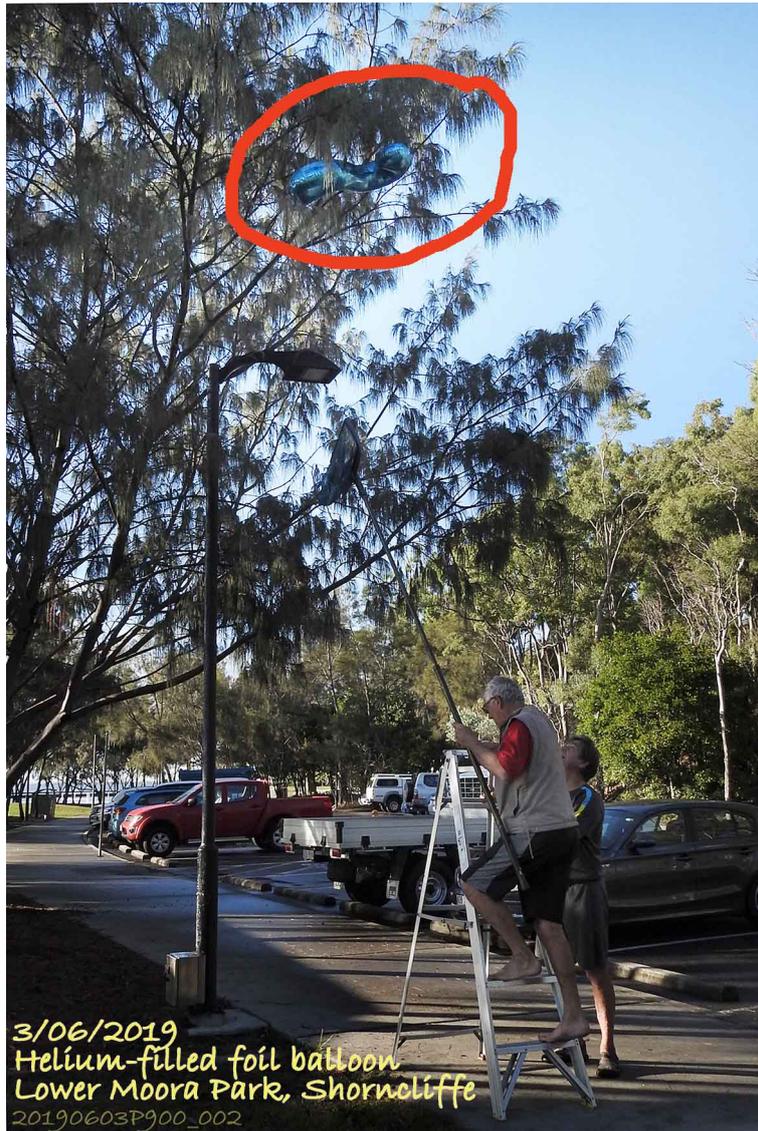
Can you please discuss a national ban on the release of balloons and the use of helium to inflate balloons at the next Meeting of Environment Ministers?

Yours sincerely,

Karen Joynes
No Balloon Release Australia







3/06/2019
Helium-filled foil balloon
Lower Moora Park, Shorncliffe
20190603P900_002



3/06/2019
Helium-filled foil balloon retrieved from tree
Lower Moora Park, Shorncliffe
20190603P900_006

From: [Karen Joynes](#)
To: [Plastic Action](#)
Subject: Fwd: A national ban required please
Date: Wednesday, 26 June 2019 8:16:56 AM

Hello,

More on why the release of balloons needs to be nationally banned, and the use of helium to inflate balloons.

Regards,
Karen Joynes

----- Forwarded message -----

From: **Karen Joynes** [REDACTED]
Date: Tue, Jun 18, 2019 at 11:15 AM
Subject: A national ban required please
To: Dawson, Minister <Minister.Dawson@dpc.wa.gov.au>

Dear Minister Dawson,

Further to my recent email, a national television program on Sunday night has demonstrated the need for a uniform, national ban on the release of balloons, and on the use of helium to inflate balloons.

Channel 7's Sunday Night episode on 16 June 2019 finished with a 22 balloon release (see below). The release was made possible by the easy, ubiquitous access to helium gas. Channel 7 showed no regard for the law, which, in NSW, bans the release of 20 or more balloons. Despite the show being screened across the nation, it did not acknowledge that the release of balloons is banned in Queensland, or that it is recognised as littering in Victoria, thereby encouraging illegal and environmentally irresponsible acts in those states.

The NSW EPA is following up on this incident, but after the act is too late.

To reduce littering and waste, to protect the marine environment and wildlife, and to protect terrestrial wildlife and farm animals, when will the Ministers for the Environment unite on a simple, national ban on the release of balloons and on the use of helium to inflate balloons?

When the United Nations reports that humans are responsible for the 6th mass extinction of wildlife on the planet, why is it so hard to take national action which would protect endangered and threatened species?

Yours sincerely,

Karen Joynes
[REDACTED]

At about 33.47 is the best view:

<https://7plus.com.au/sunday-night?episode-id=SNIT19-020&fbclid=IwAR0V92IGhUmihpwTcC4wkdrxOP9esyQGQDWI6eDmEAc1RUdTTJctu5GCvk>

screenshot1 balloonrelease.jpeg



screenshot3:16.6.29.jpeg



From: [Karen Joynes](#)
To: [Plastic Action](#)
Subject: Fwd: research paper into impacts of balloons
Date: Wednesday, 26 June 2019 8:20:27 AM

Last one - thanks,

Karen

----- Forwarded message -----

From: **Karen Joynes** [REDACTED]
Date: Sat, Mar 2, 2019 at 10:08 AM
Subject: research paper into impacts of balloons
To: Dawson, Minister <Minister.Dawson@dpc.wa.gov.au>

Dear Minister Dawson,

Please find following an ABC article and the research paper it refers to:

https://www.abc.net.au/news/science/2019-03-02/balloons-lethal-to-seabirds/10861022?fbclid=IwAR21LQ9C7F8RU0Xcfqq5js_G6XyC2rI5xfS6RWw3576vypMGNMywO5NTXo8

<https://www.nature.com/articles/s41598-018-36585-9>

Can you now please ban the release of balloons in your Litter Act and the use of helium to inflate balloons?

Can you also please encourage the other states and territories to follow?

Yours sincerely,

Karen Joynes
No Balloon Release Australia

[REDACTED]

Reducing Single-Use Plastic
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919
20th June 2019

Re: Reducing Single Use Plastic in WA

Dear Sir / Madam

The Katanning Landcare Group are very supportive of moves to reduce the amount of single-use plastics in WA. We understand the environmental impact of the plastics, and also some of the attitudes and behaviours behind single-use plastic use. Both are damaging our environment.

Katanning Landcare runs a small shop, to help fund our community operations, selling re-usable and plastic-free eco-products. We've been delighted with the response from a wide range of the community, and buoyed to see so many people keen to reduce their waste impact. We believe the West Australian community is ready to see strong government action on reducing single-use plastics.

Specifically:

- We would like to see a more extensive ban on plastic bags – including barrier bags in the fruit & vegetable section and thicker ('15c') bags. Since the ban came into place, we have seen so many shops simply buy thicker plastic bags and supply those (for a small fee, but a surprising number of people are still willing to pay it!).
- We would like to see biodegradable and degradable plastics only allowed to be used where there are guarantees of correct, high temperature facilities e.g. such as within a hospital situation. Compostable should be the only type allowed out into the general community.
- The overwrapping of products, including plastic pre-packed fresh produce and non-perishable foods with more than one layer of packaging (e.g. boxes with bags inside, boxes wrapped in outer plastic, individually wrapped items inside a larger bag etc.) needs to be addressed seriously at a regulatory level.
- We would like action taken to ensure more stores are welcoming of BYO containers, including for items such as meat and fish, or takeaway foods. Currently there a lot of consumer confusion about which stores will take them, and the reasons why. The refusal of Woolworths and Coles to use tongs into BYO containers at their deli counters is a huge frustration.
- We note that other countries are extending their bans to other products. We are supportive of these moves where there are alternatives available – such as straws, disposable cutlery and cotton buds with plastic shafts.



- We recognise that there are educational uses for items such as balloons, particularly in the school sciences / STEM area (without any clear alternative available). However, when just used for decoration or balloon releases, they can cause environmental damage for no 'real purpose'. We would encourage an approach that heavily restricts the access to and use of items such as balloons, so that they can be accessed for 'valuable' pursuits rather than just 'fun'.
- Pollution from cigarette butts continues to be a problem. Harsher penalties for littering would be good – but there also needs to be more eyes on the ground policing it. More Keep Australia Beautiful Litter Reporters would be good, and also publicly promoting how many fines have been issued by these community spotters may help to deter litterers.
- Disposable nappies continue to be a major source of plastic use, landfill content and general litter, as well as supporting the 'throw-away' attitude. The State Government could make a considerable impact on encouraging cloth nappy use, such as through cloth nappy education in public hospital maternity wards (as is being done at St John of God Subiaco), imposing a tax or levy on the purchase of disposable nappies, a public awareness (including TV) campaign about how fantastic modern cloth nappies are (and the environmental impacts of disposable nappies) and equipping child health nurses with samples of cloth nappies and information to give to parents about using them.
- We believe that too many people in the community see recycling as a complete solution – happy to use something if it is recyclable – and therefore don't see the need to avoid the creation of waste in the first place. We need to see public campaigns that focus on avoidance, in conjunction with the litter and recycling campaigns.
- We would be supportive of phase-outs of 240L wheelie bins and replacing them with the smaller 120L options right across WA – for both landfill and recycling. No one household should be creating this much waste or recycling in a week! If we keep giving people the space to fill up, they'll use it.
- Community education campaigns are important for addressing behaviour change in specific groups. Katanning Landcare supports programs such as the Waste Authority Community Grants, which allow local communities to tailor awareness raising to the specific needs of their demographic.

Thank you for the opportunity to comment, and we wish the West Australian State Government well in the mission to reduce single-use plastics.

Yours sincerely,



Ella Maesepp
Landcare Officer;
for Katanning LCDC



From: [Cr. Kate Driver](#)
To: [Plastic Action](#)
Subject: Submission for single-use plastics consultation
Date: Thursday, 11 July 2019 10:05:16 AM

Thank you for the opportunity to respond to this issue.

It is pleasing that the State Government is investigating this and there is hope that Western Australia will follow South Australia in taking strong action against single-use plastics.

I note the disability sector's concern in regards to straws, however I wonder that single-use straws are essential in this instance. Surely reusable straws will still be available, and people who require them will be able to carry them with them. As a society we need to change our behaviours, which is beginning to occur. Unfortunately, this won't happen without bans and education.

Given the seriousness of pollution caused by plastics, we need to take action as quickly as possible to mitigate the effects.

Regards

Cr Kate Driver



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From: [Margaret Halid](#)
To: [Info](#)
Subject: submission to survey "approaches to reducing single use plastic items"
Date: Saturday, 8 June 2019 4:59:15 PM

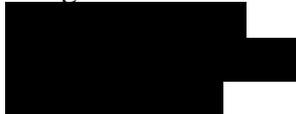
I append below my submission in relation to the survey you are conducting seeking community input on approaches to reducing single use plastic items.

I have completed your on line survey and I have recently written to the Premier and also the Minister for Local Government about the annual use of millions of non degradable plastic dog pooh bags that Local Authorities provide for use in dog exercise areas.

I give here in my submission the number of non degradable plastic dog pooh bags ordered annually by the City of Joondalup. Please bear in mind that there are 30 metropolitan and 100 rural Local Authorities in WA all ordering non degradable plastic dog pooh bags. It would be an interesting exercise to ask all of these authorities how many plastic non degradable dog pooh bags they order each year. The total would be quite astounding.

Regards

Margaret Halid



SUBMISSION

MILLIONS OF NON-DEGRADABLE PLASTIC DOG POOH BAGS USED ANNUALLY IN WA

I wish to draw your attention here to the millions of non-degradable plastic dog pooh bags being used every year in the Local Government areas of Western Australia. The majority of these non-degradable plastic dog pooh bags end up in land fill but, due to their location, some end up in the ocean, on ocean pathways, in sand dunes and in lakes, streams and other waterways.

The City of Joondalup use 4,500,000 non degradable dog pooh bags per year. Equate the numbers ordered by thirty Metropolitan Local Government Authorities in Western Australia and the result is the annual use and landfill disposal of multi millions of non-degradable plastic dog pooh bags.

The City of Joondalup has a contract for an annual supply of 4,500,000 non degradable dog pooh bags which expires on the 19th December 2019.

City of Joondalup have estimated that an order for 4,500,000 bio degradable dog pooh bags would add an additional \$150,000:00 to their annual budget.

It is obvious that this issue of plastic pollution through the annual use of multi millions of plastic dog pooh bags will need to be addressed by Governments in the near future. I suggest here that the State Government begin a process for reducing and then totally eliminating the use of non-degradable plastic dog pooh bags.

This process could initially take the form of legislating for biodegradable plastic dog pooh bags being made compulsory for Metropolitan Local Government animal exercise areas that are on a beach, on beach pathways, near sand dunes, lakes, streams and other waterways.

In addition, Metropolitan Local Government Authorities could cost save by liaising together to organise joint contracts for bulk supplies of biodegradable plastic dog pooh bags.

Providing dog pooh bags and bins is a public health initiative to maintain a clean and healthy environment and to prevent disease. RSPCA estimate that there are 4.8 million pet dogs in

Australia equating to 20 dogs for every hundred people. Dogs are the most common pets in Australia.

I noted whilst on holiday along the Great Ocean Road in Victoria that the various local authorities there provided biodegradable dog poo bags

Submitted by

Margaret Halid



From: [Michael Norman](#)
To: [Plastic Action](#)
Subject: Submission from Michael Norman - "Let's not draw the short straw" - single use plastics issue
Date: Thursday, 11 July 2019 4:12:47 PM

Dear DWER project team,

Thank you for the opportunity to make a written submission on this issue.

I am the voluntary Coordinator of "Friends of Sorrento Beach & Marmion Foreshore", a community based group that has been working on 2.5km of coastal foreshore south of the Hillarys Boat Harbour for 19 years. I have informally discussed the issue with members of that group.

Over the years we have collected a lot of litter from both the dunes of Sorrento Beach/Marmion coastal reserve but also along the adjacent beaches. The amount of litter accumulating in the dunes seems to have decreased (although we continue to also collect litter whenever we weed or plant there), but the marine debris washing up on the beach is still present, especially after storms. The main issue is the longevity of plastic and the fact that it breaks up into micro plastic in a marine or aquatic (and even other) environments and then either entangles or is ingested by wildlife.

And the surface of plastic in water absorbs mercury, arsenic etc plus "persistent organic pollutants" such as DDT, PCBs, Dieldrin, Dioxins etc and concentrates it so when marine life ingest plastic it bioaccumulates in the food chain.

I am aware that plastic production continues to grow world wide, and at the Workshop I attended I heard only about 9% is ever recycled. I am not convinced that the plastic items we put into our recycling bin are actually recycled.

A high percentage of plastic that is discarded is single use plastic, most of which can be replaced with reusable items.

It is noted that a Container Deposit Scheme will be introduced in WA in 2020, and that will certainly help reduce litter, but it covers only a small proportion of plastic items that pollute our environment. So it is only part of the solution.

So some comments and views for your consideration:

- Behavioural change programs are certainly needed, but I believe it should include messages about all our waste generation, and focus on "wiping out waste" as a lifestyle.
- But I am concerned that maybe only 10% to 20% respond to such programs. Therefore, such a program should be complimented by a state-wide ban of single use plastic items, where practical alternatives exist.
- But if some single use plastic items remain in use after a ban is applied, all disposable plastic items need to be clearly labelled so the whole item, or parts of the item, can be correctly recycled. That needs to be complimented with product stewardship regulation to mandate a good level of recycled content in new plastic items, to create a better market for recycled plastic (ie towards a circular economy). For example, at the Workshop, we were informed currently only 2% of plastic is turned back into plastic bottles. Furthermore, all government tenders should have "inclusion targets" for recycled content, where practical to do so.
- If a single use plastic ban eventuates, more products labelled as bioplastics or compostables will

inevitably come onto the market (Vegware and Biopak are two brands I am currently aware of) and I understand those need to go to a commercial composter to be processed effectively, but how many of them actually end up in a process capable of breaking them down? Especially coffee cups, bottles, straws and dog waste bags used by people in urban areas and then thrown into the nearest bin which is usually destined for landfill. Or just littered and ending up in the environment. People think that since it's "bio" it will be ok. Even if it finds its way to a commercial (FOGO) composting facility, it will look like plastic contamination which needs to be screened out. Or if they are put in a recycling bin, they could contaminate the plastic items that are separated out, as they look the same. So the question for all these products is: Does it break down quickly and harmlessly in ALL ENVIRONMENTS (including marine, aquatic etc) and will it cause harm if ingested by wildlife at any time in its lifecycle? The onus should be on the producer to have it tested by an independent and credible organisation.

Regards,

Mike Norman

(Coordinator, "Friends of Sorrento Beach & Marmion Foreshore", and,
Treasurer - "Joondalup Community Coast Care Forum")

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Plastic Action](#)
Subject: Let's not draw the short straw
Date: Thursday, 11 July 2019 9:42:51 PM

Hi,

I just wanted to share my families experiences from trying to reduce plastic usage in South Hedland. Over the past year we have actively separated recyclable materials and taken to the local recycling company despite us not having council pick up. We have also done away with the single use plastic bags (before the ban) by exclusively using own bags and eco bags for fruit and vegetables.

There are certain aspects which are preventing us to take this to the next level – **Avoidance**.

- Fruit and vegetable packaging: fruit and vegetables only available at 2 major supermarket chains and some products are only available packaged
- Meat: only available at 2 major supermarket chains, no independent butcher who may allow customers to bring own containers
- Bread: available at 2 major supermarket chains and 2 x bakeries which all package their products in plastic
- Water: the water quality in Port and South Hedland has a high level of calcination and is extremely poor to taste. Whilst, we filter our water I can see why others buy it bottled due to poor water quality in regional areas.
- Groceries: Some product groups are all in plastic e.g. pasta

Suggestions

1. If there were small businesses which allowed me to bring own containers I would use them instead of supermarkets. Is it an option to offer small business grants and/or subsidies to those which have a business model which promotes environmental outcomes.
2. Some materials can be recycled over and over without losing strength though as a packaging material may be more expensive. How can we influence manufacturers to use packaging materials which can be reused; levies, deposit schemes etc
3. Even though the single use bag has been banned, I still see a lot of the thicker bags being sold which is probably just as damaging to the environment. Can the government go the next step and ban all plastic bags. An education campaign could support the alternatives; buying reusable bags, put groceries back in trolley and take to vehicle.
4. Every tip should have a dump shop where good products can be repaired and resold for a small price therefore reducing landfill. These could be staffed by employment placement programs.
5. Microbeads: The biggest contributor to microbead pollution is from washing clothes. Stopping microbeads entering our waterways requires design changes to washing machines. Is this R & D being done by manufacturer's and can this be made a mandatory design standard for all new machines with retrofitting for existing machines.

I believe most people want to do the right thing. Education combined with opportunity (more environmentally friendly products) will go a long way.

Thanks

Michelle Dalziell
[REDACTED]



From: [Miguel Heatwole](#)
To: [Plastic Action](#)
Subject: Single-Use Plastics in WA Submission
Date: Thursday, 11 July 2019 11:48:33 AM

Dear Manager,

Nothing's too drastic when combatting plastic!

Yours sincerely,
Miguel Heatwole

This email was sent by Miguel Heatwole via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Miguel provided an email address [REDACTED] which we included in the REPLY-TO field.

Please reply to Miguel Heatwole at [REDACTED]

To learn more about Do Gooder visit [https://aus01.safelinks.protection.outlook.com/?url=www.dogooder.co&data=02%7C01%](https://aus01.safelinks.protection.outlook.com/?url=www.dogooder.co&data=02%7C01%7Cplastic-)

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Ministerial Advisory Council on Disability

Single-use plastic discussion: 25 July 2019

Overarching statements:

- The Council is supportive of a focus on reducing environmental impacts of single-use plastics.
- The Council acknowledges that plastic waste is highly prevalent, and a significant concern. However, availability, process and the safety of alternatives to single-use plastic items needs to be carefully considered.
- The Council is concerned that public policy and focus on plastic is limited in its perspective, whereby all community perspectives should be presented prior to further influencing public opinion, and not just environmental impacts.
- The Council recommends a significant focus on public education for any initiatives on reducing single use plastics.
- Consideration of plastic reduction initiatives should be carefully communicated. For example, the “*Let’s not draw the short straw*” issues paper highlights several plastic items that harm the environment. The Council is concerned that community perception of some single use plastics are being influenced and changing through the consultation period.
- Some people require single use plastic items within their daily lives and there are no reasonable alternatives. The Council is keen to ensure that these people do not feel unfairly judged through law and community perceptions on the use of single use plastic items.
- the possible extra cost impost on people with disabilities must be evaluated and considered
- The Council is willing to trial alternatives to single-use plastics, and expects education and availability of alternatives will be suitable for these trial changes. However, any changes should persons with a disability should not be disadvantaged by the reduced availability of plastic items any more than other community sectors.
- The Council is interested in investigating the possibility of exemptions to plastic alternatives.
 - Implementation of exemptions should be careful not to provide unintended barriers. E.g. requiring application forms to use continue to use single use plastic items, or requiring collection of plastics from an alternative location to its use (time impact).
 - The Council recommends plastic items (particularly straws) continue to be made available, but only on request.
- The Council are favourable to regulatory action on plastics via levies.
- Sacred Ibis birds are spreading rubbish and possible disease in communities
-

Specific plastics:

- Cigarettes and butts:
 - The Council again emphasises that any focus on cigarette butts focuses on anti-smoking campaigns.
 - The Council recommends cigarette butts be made out of a non-plastic material.
 - The Council advises that mental health perspectives should be considered for targeted education or action on cigarette butts. Individuals with a mental health condition should be consulted prior to any action or announcement.

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- Plastic straws:
 - The Council states that reductions to the availability of plastic straws will significantly impact the livelihood and accessibility to products and services for people with a disability.
 - The Council highlights that there are several health risks for particular persons and disability, and these differ for each straw alternative. For example:
 - Bamboo straws are rigid and present a safety risk for persons with an involuntary action.
 - Metal straws are also rigid, and present the same health risk as bamboo. Metal straws also draw heat and can lead to burns.
 - Glass straws mirrored the concerns for metal straws, and also carry risk for injury if broken when used with hard edged drinking vessels.
 - Silicone straws have a strange mouthfeel, which may be a deterrent for some users. Silicone straws may also not withstand or suitably protect from heat.
 - Paper straws lack suitable structural integrity to withstand heat. Users that take longer to consume a drink may have to use multiple straws.
 - Each of these straws (aside from silicone) present limited flexibility which could limit their use.
 - reusable straws are very hard to clean for people with some disabilities and who are living independently and will therefore, become single use straws.
 -
- The Council notes that hospital plastic waste is significant and should be a focus for large scale plastic reduction.
 - The Council suggests the healthcare sector would benefit from increased plastic life cycle analysis to identify reduction opportunities.
- Disposable nappies and incontinence pads:
 - The Council have observed nappies and incontinence pads as littered items, or building up in local bins.
 - The Council have also observed an increase in birdlife nearby to these locations as a result.
 - The Council supports approaches to reduce their prevalence.
 - The Council have discussed alternatives to incontinence pads, but have not identified a clear alternative.
 - Need to identify alternatives and trial their use.
- The Council indicates that pre-existing alternatives to plastic cutlery are already suitable.
- The Council recommends that impacts on waste streams from condoms and personal care products should be emphasised and not avoided.

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Feedback received and incorporated into above text:

Ministerial Advisory Council on Disability

Single-use plastic discussion: 25 July 2019

Council endorsement and comments

Six responses have been received and all said it was a comprehensive summary and added the following comments:

- Add that the Sacred Ibis birds are spreading rubbish and possible disease in communities
- The summary only partially covered the possible extra cost impost on people with disabilities
- Change where you have said that “MACD will take action”, to “MACD will support action”.
- Add that reusable straws are very hard to clean for people with some disabilities and who are living independently and will therefore, become single use straws.

Peta Kenworthy
Executive Support Officer
MINISTERIAL ADVISORY COUNCIL ON DISABILITY

6 August 2019



**National
Retail
Association**

SUBMISSIONS FROM THE NATIONAL RETAIL ASSOCIATION

In response to Issues Paper:

‘Let’s Not Draw the Short Straw, Reducing Single-use
Plastics’

Submitted to:

Western Australian Department of Water and
Environmental Regulation (DWER)

July 2019



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Enquiries:

David Stout, Director of Policy



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1. INTRODUCTION

The National Retail Association (NRA) welcomes the opportunity to make submissions to the Western Australian *Department of Water and Environmental Regulation (DWER)* regarding the 'Let's Not Draw the Short Straw: Reducing Single-use Plastics' discussion paper.

The NRA acknowledges the impact of plastic on the environment, particularly when disposed of incorrectly as litter, and supports the aim of reducing the impact of litter on our natural environment. The NRA is convinced by research which indicates that plastic waste affects marine life through ingestion and entanglement, is commonly littered and contaminates waste treatment facilities. The NRA also supports the Minister's view that plastic waste can impact terrestrial animals and can enter the human food chain, posing a risk to public health.

While we support the need to address the impact of plastic on our environment, we submit that initiatives must be carefully-considered, trialled and assessed in order to create effective, viable and long-lasting improvements. Though much research has been done on the impact of plastic litter when it enters our environment, there is little consensus on what the ideal solutions are, that is: which alternatives should replace functional plastics; which solutions produce the best long-term environmental impact; which are practical and possible with current materials, technology and infrastructure; which are available and affordable in the Australian marketplace; and which has greater net public benefit.

It is important to note that plastic is used by consumers and businesses for many valid reasons, including: meeting critical requirements and standards designed to prevent contamination and risk to human health; meeting consumer demand for convenience and mobility; meeting demand for products to be affordable to the majority of the population; meeting demand for products to be fit for purpose and intact upon purchasing; and meeting increasing demand to reduce food waste by reducing spoilage and extending shelf life.

For many years retailers across Australia have been proactive in various environmental initiatives, making alternative bags available, promoting their use with subtle messaging, and providing in-store recycling. The NRA submits that retailers are concerned about the impact of plastic litter on the environment, are already taking steps to improve sustainability practices, have complied with regulatory interventions to date, and need time and support to continue innovating while meeting consumer demands.

In terms of next steps, we submit that immediate action should be taken on 'low impact on industry' initiatives in which environmental impact is immediate, proven alternatives are widely available and affordable, and potential risk and impact on public safety is low. As such we are in favour of immediate action on banning outdoor balloon releases, phasing out microbeads and banning lightweight plastic shopping bags. We also support further education campaigns and harsher penalties for cigarette butt littering.

Further research is needed into 'medium impact on industry' initiatives such as reducing issues caused by cotton buds, fishing gear and wet/baby wipes. These products have sizeable consumer demand and have specific purposes, including medical uses, and in our opinion, there is little research to establish and clearly recommend viable alternatives at this point in time. Research needs to be undertaken to assess whether product redesign is possible (ie. Cotton buds) or whether consumer education and recycling initiatives (ie. Fishing gear and wipes) could resolve environmental impacts while managing consumer demand.

We submit that initiatives to reduce the use of plastics which contain, touch or protect foodstuffs are 'high impact on industry', or 'high risk' not only in terms of public health and safety, but in their impact on food waste, household budgets and modern lifestyles. These items, such as produce bags, foodstuff packaging, utensils, straws, beverage containers, coffee cups and takeaway food containers are used for a wide variety of purposes but are common in their need to meet high standards of food safety and also in their high consumer demand.

For high complexity/high risk items, we recommend a considered and evidence-based approach and submit that voluntary industry approaches, product labelling (where appropriate) and education/behaviour change programs are the most appropriate next steps. We also submit that government research and investment into infrastructure to sustain a circular economy are also needed.

2. ABOUT THE NATIONAL RETAIL ASSOCIATION

Currently, the Australian retail sector accounts for 4.1 percent of GDP and 10.7 percent of employment, which makes retail the second largest employer in Australia and largest employer of young people.

The National Retail Association (NRA) is Australia's largest and most representative retail industry organisation. We are a not-for-profit organisation which represents over 28,000 outlets from every category of retail including fashion, groceries, department stores, household goods, hardware, fast food, cafes and services.

We exist to help retail and service sector businesses comply with an ever changing and growing regulatory environment. Our services are delivered by highly trained and well-qualified in-house experts with industry specific knowledge and experience. We provide professional services and critical information right across the retail industry, including the majority of national retail chains and thousands of small businesses, independent retailers, franchisees and other service sector employers.

2.1. Specialist expertise

The NRA Policy Team helps retail businesses succeed and grow within an ever-changing regulatory environment. We work with a wide range of industry stakeholders – retailers, government, law enforcement, regulatory bodies, shopping centres, community groups, supporting associations and many more – to develop industry-wide policy platforms or positions on issues affecting the Australian retail sector. We bring the interests and concerns of retailers to the table to ensure that regulation is realistic, cost-effective and manageable across all retail businesses.

We work proactively at international, federal, state and local government levels to ensure the interests and needs of the Australian retail and services sectors are protected and promoted. Rather than running from inevitable regulatory change, we provide a bridge between retailers and government – facilitating the exchange of ideas and information, which ultimately leads to more informed, commercially-aware outcomes for all parties.

State-wide bag bans

The NRA was directly engaged by the Queensland, Western Australian and Victorian state governments to manage the engagement and education of retailers in regard to each state's bag ban legislation. To facilitate this, the NRA developed and implemented a Retailer Transition Program tailored to each state, including:

- developing dedicated online portals of information for retailers;
- developing custom resources and signage for retailers to display in their stores to help inform staff and customers;
- delivering hundreds of workshops and tours in shopping precincts resulting in direct engagement with over 30,000 retail businesses thus far;
- delivering a dedicated Bag Ban Hotline for retailer queries; and
- developing and implementing social media and traditional media strategies to increase awareness and education.

We were also engaged by both Queensland and Western Australian governments to develop and deploy state-wide customer education and awareness campaigns supporting the introduction of each state's bag ban. These two campaigns reached over five million Australians and contributed to significant consumer behaviour change.

The National Retail Association continues to deliver complaint handling and auditing programs in Queensland and Western Australia to ensure retailers comply with the relevant legislation.

Container Deposit Schemes

The NRA continues to work closely with the Department of Water and Environmental Regulation (DWER) to inform the design and implementation of the Container Deposit Scheme (CDS) in Western Australia which is due to be launched in 2020. The role of NRA in the CDS Advisory and Technical Working Group was to provide industry-

specific advice and workable solutions to inform strategy, complement existing programs and provide additional recycling incentives.

National Retail Association Sustainability Committee

The National Retail Association Sustainability Committee was launched in early 2019, consists of experts from across the retail industry, government and associated agencies, and aims to continue the positive momentum of sustainability initiatives in retail. We consider the impact of retail activities upon sustainability, the community and environment and investigate the effectiveness of policy and industry mechanisms to create sustainable change. We believe that all issues have individual causes and effects, with different commercially viable and environmentally sustainable outcomes. For this reason, it is vital to collaborate with all stakeholders to create long-lasting outcomes.

3. RETAILER ACTIONS TO DATE

For many years retailers across Australia have been proactive in various environmental initiatives, making alternative bags available, promoting their use with subtle messaging, and providing in-store recycling. The NRA submits that retailers are concerned about the impact of plastic litter on the environment, are already taking steps to improve sustainability practices, have complied with regulatory interventions to date, and need time and support to continue innovating while meeting consumer demands.

3.1. Voluntary initiatives

- Prior to state-wide bans, several towns across Australia have introduced voluntary bans on the use of plastic bags. In 2003, Coles Bay in Tasmania became the first Australian town to introduce a voluntary plastic bag ban. In November 2012, Woorabinda Shire Council in Central Queensland became the first local government area to introduce a plastic bag ban to reduce the amount of litter in the community.
- Thousands of retailers – from small to large retailers – have voluntarily stopped using plastic bags.
- Alternatives have been in use for many years in Bunnings, IKEA, McDonalds, KFC and thousands of small retail stores and food outlets.
- Coles and Woolworths voluntarily ceased supplying lightweight plastic shopping bags nationwide in June 2018. This past June, Woolworths reported issuing 3 billion fewer bags from its Australian stores in the first year of bans in Australia, while Coles reported that they were able to divert 1.7 billion single use bags from landfill. Coles and Woolworths have also introduced a range of reusable bags including an entry level bag made from 80 per cent recycled content, and a range of reusable bags that support community organisations.
- In June 2018, Coles supermarkets committed to a number of packaging initiatives, which support the Federal Government’s 2025 packaging targets, including:
 - All Coles Own Brand packaging will be recyclable by 2020;
 - More recycled content will be included in Coles Own Brand packaging;
 - Excess packaging will be reduced across stores and the supply chain;
 - Soft plastic recycling options will be available in all Coles supermarkets (which has already been achieved) ; and
 - New labelling promoting recycling will be introduced.
- In 2017 manufacturers that sell wet wipes voluntarily developed labelling standards for their products which better informs consumers of correct disposal methods. This proactive action to educate consumers about the dangers of incorrect disposal into sewerage has been fully embraced by the industry.

There are thousands of examples across Australia of initiatives in which industry has proactively taken action to improve sustainability.

3.2. State-wide bag bans

By the end of 2019, seven of the eight states and territories in Australia will have a ban on lightweight plastic shopping bags in place. The vast majority of retailers, and the NRA, have expressed strong support for bans on lightweight plastic shopping bags, given they are nationally-consistent and apply to all retailer sizes and types.

NRA intelligence indicates that the vast majority of retailers are complying with bans and shoppers have embraced new habits using reusable shopping bags and increasing their rates of recycling plastic bags and packaging. Though the bans have been a positive success, it is important to recognise that they have been one of the most significant behaviour changes in the past decade and that retailers and their staff have been at the coalface of change, enduring consumer resistance and opposition especially during the first months of the bans.

Many retailers have introduced small fees for alternative bags to cover increased costs and further reduce consumption. Retailers report that total bag consumption (including reusable options) has reduced by up to 90 per cent due to bag fees. Retailers have weathered significant consumer complaints and media criticism by introducing bag fees but the resultant reduction in consumption should be recognised and supported. Many have also introduced reusable alternatives made from recycled content, providing a viable circular economy for recycled plastics.

3.3. Container Deposit Schemes

The NRA continues to work closely with the Department of Water and Environmental Regulation (DWER) to inform the design and implementation of the Container Deposit Scheme in Western Australia which is due to be implemented in 2020.

The impending WA container deposit scheme is a well-researched, carefully-implemented and collaborative solution which addresses and integrates with consumer behaviour, business systems, circular economy objectives, as well as current waste management infrastructure. The fact that this one scheme that deals with one type of plastic item takes several years to implement also illustrates that the best solution may not be the quickest but is one that is well-reasoned, tested, and ultimately designed to create real and long-lasting change.

The NRA urges decision makers to allow manufacturers, retailers and consumers time to adjust to the Container Deposit Scheme and to avoid any further regulatory intervention (and mixed messaging) until the scheme is established.

3.4. National Packaging Targets

The Australian Government has tasked the Australian Packaging Covenant Organisation (APCO) with implementing industry codes to deliver on the target of making 100% of Australian packaging recyclable, compostable or reusable by 2025 or earlier. Many retailers are already signatories to the code and have initiatives underway to reduce or replace unsustainable packaging.

3.5. Industry Code of Practice for Sustainable Shopping Bags

The National Retail Association is currently working in conjunction with state governments to develop an Industry Code of Practice for Sustainable Shopping Bags outline clear road maps for businesses to work towards thicker reusable bags, alternative materials and recycled content.

3.6. Other initiatives

There are numerous positive initiatives underway across the retail and related sectors. For example, Salvos Stores have launched 'Moving the Needle' textile recycling program encouraging circular economy systems between retailers, consumers and charity stores. The Australian Government's National Food Waste Strategy, which targets halving Australia's food waste by 2030, has also been embraced by many manufacturers and retailers through collaboration in the Business Cooperative Research Centres Program. Many businesses are also investigating new technologies to recycle or reuse materials, such as Detmold Packaging's Recycle Me coffee cup program and start-ups developing ways to return plastic waste to crude oil for reuse.

The NRA emphasizes that the retail industry is proactively involved in improving sustainability and has borne the burden of recent substantial regulatory and consumer behaviour change. The NRA submits that future actions should support, not restrict, current innovation and should employ a collaborative approach to ensure practical, long-term change is accomplished.

4. KEY CONSIDERATIONS

The NRA supports reducing the amount of single-use plastics consumed and the amount of plastic entering the environment through improper disposal. However, we urge DWER to collaborate with retailers, manufacturers and state and federal governments to ensure that solutions are practical, researched and consistent, and that actions take into account the following considerations.

4.1. Consensus, definitions and models

It benefits all stakeholders when we share a common definition on 'single use' plastic however this is difficult to ascertain. For example, if a plastic is made from recycled content, should it still be classed as single use? If a plastic is recyclable, should it still be classed as single use? While thicker plastic bags are designed for reuse but are disposed of after one use by a member of the public, should they be defined as single use plastic?

The NRA submits that there is lack of consensus on the desired sustainable alternatives and outcomes across (and within) industry and government. For example, the Waste Hierarchy model suggests that Reusability is preferable to Recyclability, however a plastic takeaway food container is more reusable than a paper container which is recyclable.

There are multiple stakeholders such as local councils, governments, suppliers and environment groups providing contradictory or uninformed advice on sustainable alternatives, resulting in confusion for consumers and business. For example, some stakeholders recommend cotton reusable bags while others argue these have a high greenhouse impact. Retailers and consumers need clear, consistent information to be able to take action.

The NRA believes that Circular Economy models are more applicable and that, at this point in time, more focus should be placed on supporting innovation in recycled and recyclable goods, educating consumers on improving recycling behaviour to create cleaner, higher value recycling streams, shifting consumer perceptions of items made from recycled materials, investing in innovations and infrastructure, and creating a robust and commercially-viable Australian recycling sector.

4.2. Health and safety

Food and safety regulations often contradict with retailers attempts to be more sustainable. For example, businesses are criticised by local food and safety regulators for stockpiling reusable boxes due to potential vermin issues. Businesses, particularly those that sell food or produce, are often faced with choices between hygienic plastic packaging and non-food grade but more sustainable materials.

Serious concerns have also been raised regarding the increased risk of contamination using consumers' reusable containers as businesses are not able to control the cleanliness and food grade standards. Current laws allow retailers to potentially be held accountable for any adverse health impacts of contaminated food even if the consumer uses their own container.

Policies designed to address sustainability objectives must align with health and safety policies and should be consistent and applied across all levels of government.

4.3. Food waste

The Australian Government's National Food Waste Strategy aims to halve Australia's food waste by 2030. According to the Fight Food Waste Cooperative Research Centre (FFWCRC), food loss and waste represents the third largest greenhouse gas emitter with food loss along the supply chain and food waste after purchasing. In a

recent lecture, FFWCRC representative Associate Professor Karli Verghese recommended packaging opportunities to reduce food waste including increased packaging such as portioned packets, resealability, protection, and optimal product design. Given conflicting government strategies to simultaneously reduce and increase packaging, businesses are understandably confused and more consensus on the optimum balance needs to be achieved.

4.4. Consumer behaviour

Modern consumers are now somewhat more spontaneous than they were in the past, doing their shopping in conjunction with social activities or on their way to or home from school runs, university or the gym. This means that they are not always prepared and do not always come with their own reusable items. This calls for more discussion around how retailers can provide inexpensive, environmentally sustainable alternatives, supported by infrastructure that allows customers to conveniently feed their disposed items back into the circular economy.

4.5. Consumer demand

While consumer concern for the environment is increasing, there remains high demand for inexpensive and convenient options at point of sale. Though a small proportion of customers have started to use reusable water bottles and coffee cups, we believe that, at this time, the majority of consumers are not prepared to bring their own reusable utensils, straws, food containers and cups on every outing. If a ban is indiscriminate or premature, it may impose unrealistic expectations and costs on consumers, resulting in negative perceptions and potential backlash. Any action needs to have widespread support and practical solutions to create positive and long-lasting change. The NRA submits that more research into alternatives and widespread consumer education is needed to ensure any action is practical (and therefore supported by) the majority of consumers.

4.6. Consumer understanding

The NRA believes that the modern consumer has a basic understanding of the environmental impact of plastic litter, however consumer understanding is still quite limited and often misinformed on many issues. For example, the NRA has found that many consumers and businesses still believe that “degradable” plastic is an environmentally-friendly alternative. Many also do not know the difference between biodegradable and compostable plastic, the difference between home and commercial compostability, and how to properly dispose of these items. We also believe that consumers would have little knowledge of the impact of plastics on waste management systems as explained in the issues paper.

The NRA submits that there is a high level of confusion and lack of consensus regarding sustainable alternatives, and that understanding of waste stream impacts is low. We submit that collaboration and extensive education should be primary objectives before any regulatory action is considered.

4.7. Impact on household budgets

Alternatives to single-use plastics such as paper or cloth options are more expensive, sometimes 1000 times more expensive. For example, a lightweight plastic shopping bag may cost 1 to 5 cents, while a paper bag of similar size costs 10 to 50 cents. In addition, there are only a handful of suppliers offering sustainable options in Australia, meaning choices are limited and prices are less competitive.

It is unacceptable to expect retail businesses to carry this increased cost burden and they will ultimately need to pass these costs onto consumers. The NRA recommends that policies be carefully considered and implemented to avoid placing a heavier burden on already-stretched household budgets.

4.8. Unintended social impacts

There may be unintended social consequences of widespread bans or individual bans for single-use plastics such as a ban on flexible plastic drinking straws. Replacing these with an alternative that does not have the same flexibility could unfairly discriminate against vulnerable sectors such as the elderly and people with disability who rely on these items. While exemptions to a ban have been proposed, we believe that having to identify a medical or private condition just to use a straw (or the like) would unfairly single-out vulnerable groups and compromise

privacy rights. Some parts of the community, particularly medical and care sectors, use disposable plastics for hygienic and safety reasons.

4.9. Existing business pressures

The vast majority of retailers in Western Australia have responded positively to the Western Australian lightweight plastic bag ban. However, some are still coming to terms with the practical implications of existing requirements. In addition, with conflicting research on the benefits of one material over another, it can be overwhelming for many businesses to even know where to start.

Adding further complex compliance demands would add more pressure to businesses who are already feeling a high degree of pressure. This is particularly true for vulnerable small businesses and franchisees. Numbering in the tens of thousands, these small local businesses make a significant collective difference to the economy and environment, and the NRA urges restraint so that local retailers have time to absorb the implications of current changes, and find practical, workable solutions before meeting further significant compliance demands.

4.10. Ensuring real benefit

While we support the need to address the impact of plastic on our environment, we submit that initiatives must be carefully-considered, trialled and assessed in order to create effective, viable and long-lasting improvements. Though much research has been done on the impact of plastic litter when it enters our environment, there is little consensus on what the ideal solutions are, that is: which alternatives should replace functional plastics; which solutions produce the best long-term environmental impact; which are practical and possible with current materials, technology and infrastructure; which are available and affordable in the Australian marketplace; and which has greater net public benefit.

The NRA submits that consensus on sustainable options based on research and collaboration must be prioritised before any further regulatory action is considered.

4.11. Anti-competitive considerations

The supply of sustainable packaging options in Australia is quite limited and therefore lacks market factors to ensure competition, fair pricing and ethical practices. If only a few manufacturers produce approved alternatives they can control and inflate market prices. The NRA submits that government needs to carefully examine and potentially invest in, the Australian sustainable packaging industry as well as strengthening the waste and recycling sector to produce viable circular economy outcomes.

4.12. The need for national consistency

A major issue for businesses is the need for a consistent approach across the states and across all types of businesses in an effort to reduce complexity, increase consumer understanding, and to produce targeted and consistent communications. We would urge the Western Australian government to ensure that any proposed actions align with existing initiatives and national targets to avoid confusion.

4.13. The role of local government

Local governments play an important role in ameliorating the impacts of disposable plastic, but the expense is ultimately borne by our communities. The NRA believes that government needs to consider substantial investment in improving Australia's circular economy innovation and infrastructure before further regulatory change. Currently, waste management and recycling systems in Western Australia vary in each local government area, with many residents, particularly those in remote areas, lacking access to sophisticated recycling facilities.

Over the past decade many European countries have revolutionised their recycling and waste management systems, combined with extensive consumer education programs, before implementing further bans. This ensures a greater level of adoption and acceptance by consumers and greater commercial viability for businesses involved.

5. RECOMMENDED ACTIONS

While the NRA strongly agrees that plastic poses serious threats to our environment when littered, we submit that each type of item needs to be carefully considered as there is no single umbrella solution.

The NRA urges decision makers to ensure that any action taken is practical, consistent, well researched and carefully considered in order to create real, long-lasting change. In some cases, we must also allow time for innovation, understanding and practicality to catch up to our good intentions.

The NRA submits the following recommended actions, identifying where current actions or initiatives underway are sufficient, then focusing on low complexity items for immediate action and/or regulatory intervention, to high complexity (or high risk) items such as plastics which contain or preserve food.

5.1. Current actions sufficient

The NRA submits that actions that are already underway are producing positive results and both retailers and consumers need time to fully adapt to these changes.

Item	Current actions	Comment
Lightweight plastic shopping bags	<ul style="list-style-type: none"> Regulatory ban (in effect) 	<p>The NRA expressed support for the ban on lightweight plastic shopping bags and this regulatory tool has been fully embraced by the retail industry. Since the WA ban came into effect in January, the majority of retailers and consumers have now accepted the change. However it is important to note some small businesses are still experiencing challenges given inconsistent information on the best alternatives and somewhat misleading information from suppliers.</p>
Thicker plastic bags	<ul style="list-style-type: none"> Voluntary Code of Practice (under development) 	<p>Given recent success of the bag ban, some retailers are now researching alternatives to thicker plastic shopping bags.</p> <p>Therefore, in conjunction with state governments across Australia, the NRA are currently developing and gaining support for a National Voluntary Industry Code of Practice for Sustainable Shopping Bags. This Code is designed to provide clearer pathways and incentives for retailers to move towards more sustainable options which are thicker and more reusable or made from recycled content.</p> <p>We support further voluntary industry action on thicker plastic shopping bags to first allow consumers and retailers to adjust to the recently-introduced ban, and allow them the next few years to innovate and move towards more sustainable alternatives. Businesses need time to research, innovate, test and negotiate substantial changes and a tiered code (recognising different levels of action) would offer necessary incentives.</p>
Plastic beverage containers	<ul style="list-style-type: none"> Container Deposit Scheme (due to launch in WA in 2020) 	<p>The NRA supports the CDS scheme currently due to be introduced in WA in 2020 and the proposed education and support services that will accompany it.</p> <p>Importantly, this scheme has taken several years to plan and implement as it is carefully-considered, involves a high level of collaboration between industry and government, and aims to create long-lasting behaviour change.</p>

		The NRA submits that consumers and businesses will need time to adjust to the scheme and that other major regulatory changes should not be undertaken until the scheme is firmly established.
Plastic packaging	<ul style="list-style-type: none"> • Voluntary Code of Practice (underway) 	<p>Some plastic packaging preserves the life of goods from point of sale to home, minimising breakages and reducing the amount of damaged goods ending up in landfill. However, the retail industry shares the government's concern and already taking action to reduce or replace any excessive packaging.</p> <p>The Australian Government has tasked the Australian Packaging Covenant Organisation (APCO) with implementing industry codes to deliver on the target of making 100% of Australian packaging recyclable, compostable or reusable by 2025 or earlier. The NRA submits that action is underway and should be given time to deliver.</p> <p>Education for consumers regarding their recycling options will also be beneficial.</p>

5.2. Low impact on industry – immediate action recommended

We submit that **immediate action** should be taken on 'low impact' initiatives in which environmental impact is immediate, proven alternatives are widely available and affordable, and potential risk and impact on public safety and retailers is low.

As such we are in favour of immediate action on banning outdoor balloon releases, phasing out microbeads and banning lightweight plastic shopping bags. We also support further education campaigns and harsher penalties for cigarette butt littering.

Item	Recommended action/s	Comment
Balloon releases	<ul style="list-style-type: none"> • State-wide ban on outdoor releases 	The NRA supports a state-wide ban on outdoor helium balloon releases. Similar to sky lanterns, it is impossible to control the final destination of helium balloons and therefore they invariably end up as litter.
Cigarette butts/filters	<ul style="list-style-type: none"> • Education campaign • Increased disposal points • Increased penalties 	<p>The NRA supports education campaigns to educate consumers in the volume and impact of cigarette butt litter to create greater disapproval of littering.</p> <p>However smoking is a legal activity and increasing suitable places for disposal may also assist in reducing litter. Since smoking has become illegal within 5 metres of many public places, many rubbish bins or public ashtrays have been removed to discourage smoking in these areas. Shopping precincts have reported increased cigarette butt littering just beyond non-smoking areas as bins have been removed.</p> <p>The NRA also supports increased penalties for those caught littering cigarette butts.</p>
Microbeads	<ul style="list-style-type: none"> • Voluntary approaches with industry • State-wide ban 	Microbeads are the perfect example of the success story of voluntary reduction strategies with many manufacturers having already removed microbeads from their products. Microbeads are also an example of non-essential plastics which can be

		<p>replaced through more sustainable product design. The current level of global support for the eradication of microbeads plus the incentive for companies not to risk consumer disapproval for microbeads may result in eradication of microbeads entirely.</p> <p>However, if voluntary actions do not resolve the issue within the next few years, a state-wide or national ban may be worth considering.</p>
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5.3. Medium impact on industry

Further research is needed into ‘medium impact’ initiatives such as reducing issues caused by cotton buds, fishing gear and wet/baby wipes. These products have sizeable consumer demand and have specific purposes, including medical uses, and in our opinion, there is little research to establish and clearly recommend viable alternatives at this point in time.

Research needs to be undertaken to assess whether product redesign is possible (ie. Cotton buds) or whether consumer education and recycling initiatives (ie. Fishing gear and wipes) could resolve environmental impacts while managing consumer demand.

Item	Recommended action/s	Comment
Cotton buds with plastic shafts	<ul style="list-style-type: none"> • Sustainable product design • Infrastructure/ recycling • Labelling 	<p>The antibacterial properties of cotton buds makes them a significant item used in makeup application and removal, for cleaning babies and children, and for various medical purposes.</p> <p>Most cotton buds are designed with mixed materials and therefore difficult to recycle. They do not appear to be a notable part of litter impacting the environment but do impact landfill.</p> <p>Manufacturers should be given time and support to invest in more sustainable product design, assessing potential cost impacts on community segments, and infrastructure for recycling mixed-material goods should be explored.</p>
Fishing gear	<ul style="list-style-type: none"> • Increased public bins • Behaviour change strategy 	<p>Fishing line in marine environments and waterways is catastrophic to birds and sea creatures. Unfortunately there does not seem to be viable alternatives available in the marketplace.</p> <p>If no alternative product can be found, the NRA proposes that education and behaviour change is critical. For example, increasing places for disposal of broken line around fishing spots and strategies that incentivise returning broken fishing line to fishing stores for recycling, similar to battery return schemes may be effective when coupled with targeted education campaigns.</p>
Wet or baby wipes	<ul style="list-style-type: none"> • Labelling (in effect) • Education • Behaviour change strategy 	<p>Manufacturers that produce wet wipes developed a new disposal labelling Code of Practice in 2017, which clearly labels products with a ‘do not flush’ symbol. Unfortunately some consumers continue to use these items improperly and the NRA proposes that community education campaigns and alternative disposal solutions (including sanitary units) should be explored.</p>
Balloons	<ul style="list-style-type: none"> • Education campaign • Behaviour change strategy 	<p>There is currently no reuse or recycling method for used balloons, which means that the government must decide if landfill is an</p>

	<ul style="list-style-type: none"> • Labelling 	<p>acceptable solution or not. We believe that the government would face considerable public backlash if a ban was proposed.</p> <p>Public education campaigns and behaviour change strategies have proven successful in increasing responsible use (i.e. not using balloons in outdoor environments) and reducing improper disposal. Research could also be undertaken into innovative recycling strategies similar to those developed for PVC recycling in other countries.</p>
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5.4. High impact on industry and public safety

We submit that initiatives to reduce the use of plastics which contain, touch or protect **foodstuffs** are **'high impact'**, or **'high risk'**, not only in terms of public health and safety, but in their impact on food waste, household budgets and modern lifestyles.

These items, such as produce bags, foodstuff packaging, utensils, straws, beverage containers, coffee cups and takeaway food containers are used for a wide variety of purposes but are common in their need to meet high standards of food safety and also in their high consumer demand.

These high risk items require a more carefully-considered, methodical approach to trial and assess food grade, heat tolerant and sustainable substitutes, not just testing their end use but throughout the supply, waste and recycling chain to assess net public and environmental benefit.

Our members report that currently a very small proportion of customers bring their own reusable coffee cups (less than 3 per cent) or bring their own food containers (less than 1 per cent). Though many consumers may indicate their support in principle for a ban on single use plastics, we have found that many have not considered practical issues of banning foodstuff plastics, implications for food waste, limitations of alternatives, or that they would face increased costs at point of purchase.

For high complexity/high risk items, we recommend a considered and evidence-based approach and submit that **voluntary industry approaches, product labelling** (where appropriate) and **education/behaviour change programs** are the most appropriate next steps. We also submit that government research and investment into infrastructure to sustain a circular economy are also needed.

Item	Recommended action/s	Comment
Barrier/produce bags AND Prepacked fruit & vegetable	<ul style="list-style-type: none"> • Education campaign supporting reduced food waste • Increased collection points for soft plastics • Investment in recycling infrastructure 	<p>Any barrier or produce bag or packaging that contains food is designed to avoid contamination and improve shelf life of some of our most nutritious food groups.</p> <p>To eliminate these plastics altogether would have serious repercussions for consumers, retailers, the local economy and environment:</p> <p>Increased food waste</p> <p>Increased risk of contamination</p> <p>Reduced profitability for retailers</p> <p>To our knowledge, no viable alternative to plastic produce bags that meets health and sustainability needs is available. The NRA also supports the government's view that current bioplastics are problematic (in the environment, recycling and consumer behaviour) and does not support these as a viable solution.</p>

		<p>Most soft plastics are recyclable but are not currently catered for in local government recycling systems. Retailers have voluntarily taken steps to fill this void, for example, Coles and Woolworths offer soft plastic recycling in-store via an arrangement with REDcycle which provides customers with a practical, accessible way to recycle soft plastics.</p> <p>The NRA submits that the Australian system and market for recycled and recyclable goods is limited and immature compared to overseas counterparts like the EU, and government investment into innovation and infrastructure in the waste and recycling sectors is urgently needed.</p> <p>The NRA supports the Australian Government’s national strategy to reduce food waste and believes that the public would benefit from education campaigns around the benefits of foodstuff plastic packaging in reducing food waste, coupled with education about recycling soft plastics. We also propose that government consider investing in soft plastic recycling being incorporated into household recycling systems.</p>
<p>Cutlery, straws, stirrers AND Takeaway food containers AND Takeaway coffee cups, lids</p>	<ul style="list-style-type: none"> • Voluntary approaches with business & industry • Sustainable product design • Investment in innovation and recycling infrastructure 	<p>The NRA submits that more research is needed into sustainable alternatives to plastic cutlery, cups, stirrers, drinking straws, takeaway coffee cups and lids, and takeaway food containers.</p> <p>These items have filled modern consumer demand for mobility and convenience in line with current lifestyles. Though some consumers may support a ban on single-use plastics in principle, current consumption, low take-up of reusable options, and implications of increased cost need to be considered.</p> <p>The NRA submits that research and collaboration is needed to reach consensus on sustainable alternatives and which ones actually achieve better environmental outcomes. For example, paper straws usually use virgin timber to meet food grade (ie. potential deforestation) and are often coated in plastic or wax, and bamboo utensils still pose an environmental threat (i.e. methane gases) as they slowly break down in landfill.</p> <p>All of these items are generally purchased in one place and consumed while mobile or elsewhere which can make product stewardship recycling initiatives difficult.</p> <p>The NRA recommends that a reduction in these plastic items is approached in a staged way, with a whole of supply chain approach, including more recycling options to find the best solution with the greatest overall benefit.</p> <p>We also submit that greater government investment in new technologies, such as developing food grade, heat tolerant containers made from recycled and recyclable materials should be explored.</p>

6. RECOMMENDED STRATEGIES

6.1. Voluntary approaches with business and industry

Voluntary approaches reward early adopters, motivate retailers to understand the reasons for regulatory change, signal a need for innovation, and give smaller local retailers already experiencing the burden of a complex regulatory environment time to make adjustments and find workable sustainable alternatives. Most importantly, a slower, steadier approach like this gives regulators insight into the problems and issues inherent in changes of the magnitude considered here.

Microbeads are the perfect example of the success of voluntary reduction strategies. The current level of global government and industry support for the eradication of microbeads, when coupled with consumer education programs, can be enough to eradicate microbeads now and for the future.

The NRA submits that many positive initiatives involving collaboration between government and industry are underway, such as the Australian Packaging Covenant, Container Deposit Schemes and an Industry Code for Sustainable Shopping Bags, and these need time and support to deliver outcomes. The NRA urges decision makers to support circular economy initiatives which aim to create a long-term and commercially-viable shift from treating 'waste' as a 'resource', not just reduction in use.

For example, the NRA puts forward the impending WA container deposit scheme as a researched, carefully-implemented solution which addresses and integrates with consumer behaviour, business systems, circular economy objectives, as well as current waste management infrastructure. The fact that this one scheme that deals with one type of plastic item takes several years to implement also illustrates that the best solution may not be the quickest but is one that is well-reasoned, tested, and ultimately designed to create real and long-lasting change.

6.2. Education/behaviour change strategies

The NRA submits that though consumers are generally concerned about the impact of plastic on the environment, they lack understanding on many issues such as degradability, bioplastics, recycling markets, impacts on waste management systems and the benefits of supporting goods made from recycled materials. Businesses are similarly faced with confusion, misinformation and misleading claims from suppliers, and many report that they don't know which alternatives provide the best environmental outcome.

Much greater investment in, and more consistent, education of consumers and businesses is needed.

6.3. Labelling

National manufacturers are currently adopting the Australasian recycling label which clearly outlines the waste streams for recycling. The NRA recommends that government do more to help educate consumers, for example, council websites could reflect this information and include all current recycling streams, including the retail initiative REDcycle.

6.4. Investment in education, innovation and infrastructure

The NRA submits that the Australian recycling system and market for recycled and recyclable goods is limited and immature compared to overseas counterparts like the EU, and government investment into innovation and infrastructure in the waste and recycling sectors is urgently needed to develop a circular economy in Australia.

The NRA also submits that there is a high level of confusion and lack of consensus regarding sustainable alternatives, that understanding of waste stream impacts is low, and that contradictory messaging around food waste and packaging confuses businesses and consumers. We submit that collaboration and extensive education should be primary objectives before any regulatory action is considered.

7. CONCLUSION

Moving towards a circular economy requires a change in perception, a shift from thinking of consumed items as 'waste' towards seeing them as valuable 'resources'. This requires incremental steps and a whole of supply chain approach, not just avoidance, with the right infrastructure and investment in innovation to create long-term change.

Retailers are keen to collaborate and be part of the solution. Many retailers are taking a proactive approach to environmental initiatives and strongly support current regulations and initiatives. At the same time businesses are faced with a myriad of regulations, economic pressures, consumer demands, health and safety requirements, cost limitations, misinformation about alternatives, and lack of recycling infrastructure in many areas.

Therefore we urge decision makers to:

- Support current positive initiatives without regulatory intervention;
- Take immediate action on items with low impact on industry;
- Assist with research into more sustainable product design and invest in education campaigns;
- Invest time and resources into investigating, trialling and assessing alternatives to high impact or high risk items; and
- Invest time and resources into improving innovation and infrastructure to help build a circular economy in Australia.

Thank you for this opportunity to provide our submissions on behalf of the retail industry and our members.

Should you have any queries, I can be contacted on [REDACTED].

Yours faithfully,

[REDACTED]

David Stout
Director, Policy
National Retail Association



National
Retail
Association

From: [Nikola Allia](#)
To: [Plastic Action](#)
Subject: Waste initiative
Date: Saturday, 4 May 2019 3:22:37 PM
Attachments: [image2.png](#)

Hi Team,

“Did you know every disposable nappy ever made is still in existence?”

I am a resident of City of Joondalup and I have identified an area of waste that I think the local and state government can get on board with to help not only support young families in our local community but also local businesses at the same time as reducing waste.

Many of the residents here in Joondalup are young families. As many of us know, raising a family comes with a lot of waste! The biggest of which are disposable nappies.

I had my son, Joshua, 16 months ago now and have been using modern cloth nappies for a large portion of the time. I have seen other local councils in other states offering rebates on the purchase of cloth nappies. I feel this would encourage more new families to try cloth (they have come a long way since our parents generation) and reduce landfill and waste in our community if it were to be offered here in state and local council programs.

Being a part of a few online cloth nappy communities, I've also realised that there is a lack of knowledge on how to use cloth (as we think back to the old style with laborious cleaning and soaking etc). Knowledge is power. Simple workshops run through city councils may be another avenue to support the implementation of cloth as mainstream in our community.

Along my journey, I have also discovered different councils and small businesses offering a nappy library. This gives new parents the opportunity to 'try before you buy' so they can see in real life the difference between styles and understand how to use, wash and care for each style.

Attached at the end of this email is some information and stats around cloth vs disposables as there are common myths around water consumption and cost of cloth nappies. There's also some links to the Australian Nappy Association who have lots of info and links to studies and other initiatives around Aus!

Below is my phone number as I'd love to hear from you and your thoughts on the initiative and hope that we can work towards a more sustainable future together. I'd love to be involved if there are avenues we can explore. Thanks for your time and consideration.

Nikola Allia



Relevant links:

Australian Nappy Association - resources and studies:

<https://www.australiannappyassociation.org.au/resources-we-love/>

Nappy libraries, rebates, demo packs and workshops:

Cloth v Disposable Nappies

The Environmental Impact
Each Infant per year

REUSABLE NAPPIES		DISPOSABLE NAPPIES
13-40m ²	Land for Raw Materials	407-829m ²
19-32m ³	Water Resource Depletion	14-28m ³
0.3-0.5GJ	Energy Consumption	1.2-2.5GJ
3-6kg	Solid Waste	288-360kg



A U S T R A L I A N
N A P P Y A S S O C I A T I O N
growing cloth nappy use, together

Source:
LIFE CYCLE ASSESSMENT: REUSABLE AND DISPOSABLE NAPPIES IN AUSTRALIA
Environmental Engineering, School of Engineering
The University of Queensland, Brisbane 2009

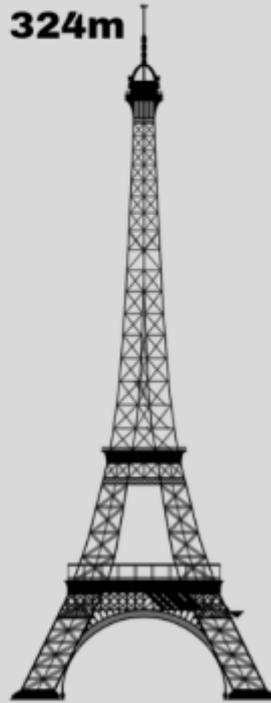


3 YEARS OF DISPOSABLE NAPPY USE

Stacked one on top of the other



330m



324m

Sent from my iPhone

From: [Noelline Edwards](#)
To: [Plastic Action](#)
Subject: Single use plastic bags on local newspapers
Date: Wednesday, 10 July 2019 11:21:41 AM

I am writing to protest the use of plastic bags that are dropped on the footpath every week outside the units that I live in.

Living in Mandurah we receive two local rags each week.

Usually they are picked up by one of the residents and placed in the recycling bin. So that makes contaminated paper waste and likewise for the plastic bags (even though the bags shouldn't be in the RC bin in the first place). It seems, after writing to David Templeman, that this is an arrangement that the delivery people have made with the local council to prevent the dumping of papers on the footpath being considered as littering.

Well, it is still littering as for most of the following week these papers; complete with plastic bags are laying on the paths and roadside.

Could the people who deliver the papers be encouraged to use an elastic band? Or some other way to hold the paper together.

The use of these Plastic bags are only excusable during wet weather.

Or perhaps specific labelling could be used on the bags encouraging recipients to dispose of the bags with REDcycle at the supermarket.

My sincerest regards for this matter

Noelline Edwards


Sent from my iPad

From: [Pauline Winrow](#)
To: [Plastic Action](#)
Cc: Minister.Dawson@dpc.wa.gov.au
Subject: Plastic water pollution
Date: Thursday, 11 July 2019 8:57:56 PM
Attachments: [Bird Species Account 29-6-19 Gregory .docx](#)

Dear Hon. Stephen Dawson MLC,

I wish to bring your attention to the pollution of the Geraldton and Port Gregory beaches with plastic which is killing wildlife.

I have not seen plastic pollution in any quantities before but recently it has been everywhere.

Urgent action is needed:

- All fishing material and floats should be made of pre plastic materials such as metal / wood or organic material.
- All producers of plastic containers, electrical good – everything should be responsible for the buy back, deposit and disposal of in a manner which does not interfere with the environment or the product should use a material that is of no danger to the environment whatsoever. Surely plastic can be changed into a product that is like wood etc which has none of the sinister properties which it has now. Maybe soon as it hits water – it can dissolve into nutritious food or at least something that is harmless.
- Floats of polystyrene break up into many small pieces and they litter the beaches everywhere.
- I have enclosed these disheartening pictures taken at Greenough River beach area on the 7-7-2019.

I am just stating the obvious that they are killing wildlife and poisoning the oceans.

It needs to stop – welcome to our rubbish dump world.

I hope you get a thinking tank going to set this right now.

Best wishes from Pauline Winrow.







29/6/19 JUNE BIRDING EXCURSION



Attending: Mike, Alan, Anthea, Russell, Trish, Pauline, Alice, Ann, Heather, Sally, Sioban.

(Driving: Mike, Russell, Alice, Heather) Sunny all day

We recorded 54 different species.

Meet at 2 Brisbane St., Waggrakine (Alice's) (0745)

Waggrakine (Beattie Rd.) to Park Falls (0800)

Galah, Magpie-Lark, White-browed Babbler, Crested Pigeon, Singing Honeyeater, Black-faced Cuckoo-shrike White-plumed Honeyeater, Brown Honeyeater, Laughing Dove, Australian Raven, Welcome Swallow, Tree Martin, Singing Honeyeater, Willie Wagtail

Northampton (0900)

1 Little Eagle, Tree Martin, Singing Honeyeater, White-plumed Honeyeater

Horrocks Beach Rd. & Bowes R. Rd

Galah, Australian Raven, White-necked Heron, Laughing Dove
Australian Ringneck Parrot, Grey Currawong, Australian Magpie, Singing Honeyeater, Nankeen Kestrel, Tree Martin, Magpie Lark

Bowes River Estuary (0930) Falling tide

4 Black Swan, 30 Eurasian Coot, 5 Australasian Grebe
3 Pied Cormorant, 1 Little Black Cormorant, 3 Pelican
10 Black-winged Stilt, 2 Hardhead, 1 Great Egret, 1 White-necked Heron, 1 White-winged Fairy-wren, 2 Pacific Gulls, 2 Silver Gulls, 1 Yellow-billed Spoonbill, 2 Australian White Ibis, 4 Little Black Cormorant, 1 Straw-necked Ibis, Australian Raven

Horrocks Beach (1045) Falling tide

20 Crested Terns, 3 Pacific Gulls, 8 Silver Gulls, 1 Osprey, Tree Martin, 2 Pied Cormorant, 1 Black-faced Cuckoo-shrike
1 Nankeen Kestrel, 12 Silvereye, Fairy Wrens

Hutt River Estuary Reserve (1230 -) Falling/Low tide

(Collected 7 x bag and 1 x box of broken up plastic and nylon rope from high tide mark of the east "lake" bank).

1 Yellow-billed Spoonbill, 1 White-faced Heron, 2 Australian Shelduck, 1 Raptor (?), Nankeen Kestrel, Singing Honeyeater, 2 unknown smaller shorebirds at sand spit (too far away).

Port Gregory

Entrance Lagoon Crossing (1330) Falling/Low tide

65 Banded Stilts (black piping mudbank) + 40 (swimming behind piping), 7 Red-necked Avocet

+ at "Town Pond" at T-junction (swelled from rain)

40 Banded Stilt, 2 Pacific Black Duck, Gull-billed Tern

Ponds to north (200m walk)(1430) Low tide

15 Black-winged Stilt, Nankeen Kestrel, Willie Wagtail, White-backed Swallow, 1 Brown Goshawk (juvenile), 4 Australian Shelduck, Australasian Pipit, Singing Honeyeater, Grey Shrike-Thrush, Little Grassbird

Pt Gregory Beach (1400)

Pelican, Pacific Gull, Crested Tern, Pied Cormorant, Little Black Cormorant, Welcome Swallow, Willie Wagtail, Caspian Tern

Hutt River Reserve (1530)

(rushing stream, green grass, kangaroos, rabbits (multiple extensive warrens)

White-winged Fairy-Wren, Welcome Swallows, Australian Raven, Mistletoebird, Jacky Winter(juvenile), Willie Wagtail, Singing Honeyeater, Red-capped Robin, Silvereye, Inland Thornbill (?)

Wedge-tailed Eagle, Little Eagle, Nankeen Kestrel





Peel Preservation Group Inc.

Hon. Stephen Dawson MLC
Minister for the Environment
2 Havelock Street
West Perth WA 6005
Email: Minister.Dawson@dpc.wa.gov.au

9 July 2019

ABN: 59 315 206 816

Return Address

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Mandurah WA 6210

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peelpreservation@westnet.com.au

Website

www.peelpreservation.org.au

Facebook

<http://bit.ly/2dwavat>



PPG is a non-profit organisation devoted to the conservation of the natural environment in the Peel Region of Western Australia

RE: SINGLE USE PLASTIC AND PLASTIC WASTE

The Peel Preservation Group has previously forwarded two submissions to the Minister for the Environment regarding banning single use plastic bags (24/07/17) as well as banning plastic drinking straws and balloons (22/02/18). The State Government is to be commended for introducing the ban on single use plastic bags that were being freely distributed by supermarkets. However, given the inordinate amount of non-biodegradable plastic waste and refuse that finds its way into our waterways and landfill there is still a lot more that needs to be done, both in terms of government regulations as well as consistent public education. As mentioned in our "Plastic bag ban" submission of 24/07/2017, it was then estimated that Australians were using 4 billion plastic bags every year. We trust that there has now been a significant reduction in plastic bag use since Australian State governments have introduced the relevant supermarket bans.

In addition to recent legislation, our group holds the strong view that the larger and thicker "re-usable" plastic bags that can be purchased at supermarkets, or sometimes given out freely at other shopping outlets, also need to be banned or at the very least phased out by a strong awareness campaign about the intractable problems associated with a material that simply doesn't break down in any short or medium time frame. Current scientific research informs us that plastic doesn't decompose but instead it becomes micro and nano particles which then become part of the toxic food chain, with the potential to disrupt the human endocrine (hormone) system and likely to cause other long term health effects on organisms in our ecosystem that are not clearly well known at this stage.

Overall our group is very concerned about the use of plastic bags of all types, plastic drinking straws and cups, plastic food packing, microbeads in body care products (the voluntary ban has not worked) and microfibres in clothing.

There is no good rational and responsible reason for so called "re-usable" plastic bags to be readily distributed by shopping outlets when there are a number of environmentally friendly alternatives that are available, and which, hearteningly, now seemed to be embraced by many in the community since the single use plastic bag ban was introduced.

Our group is in the midst of writing to retailers at Mandurah shopping centres in regard to reducing plastic packing, but we are also heartened by some of the positive moves that have recently been put in place, especially moving away from plastic drinking straws to more viable alternatives. Some smaller shops in our community and our local cinema have also introduced non-plastic drinking straws and deserve to be commended for their environmental responsibility.

While initiatives from the community are a positive leap forward, government regulations and programs are crucially vital. Some initiatives can only be conducted through major government programs such as the Container Deposit Scheme, which has been a long time coming but deserves the loud applause from all environmental groups.

Hence our group is keen for more governmental action and regulation on all plastic bags and all plastic packaging.

The evidence against plastic waste continues to accumulate almost as fast as the vast conglomeration of floating refuse that is known as the "Great Pacific Garbage Patch". However, in the recently published book "Plastic Soup", oceanographer Michiel Roscam Abbing points out that only 0.5 per cent of plastic floats, which means that microplastics and nano plastics are breaking down in the ocean to a "soup" which is all too readily consumed by sea life. Recent studies then estimate that humans ingest up to 211,000 pieces of microplastic every year, again with biological consequences that are very unclear now. Plastic is not part of our historic human diet hence our least conservative response needs to be one of serious concern.

The amount of "plastic soup" in our own local environment has become very clear to our group since we purchased and installed two Seabins in one of our local marinas last year. The Seabin is emptied every day and regularly contains at least several handfuls of small plastic particles, some of which are only a few millimetres in length. Please see photos on pages four to six.

Our final concern regarding plastic that may require government action and regulation soon relates to microbeads and plastic fibres in human clothing that regularly find their way into our waterways and then become part of the "Plastic Soup". I was rather surprised and somewhat enlightened to hear on a recent ABC Q&A "science special" episode that 90 per cent of plastic microfibrils in clothing could be prevented from entering our waterways if all washing machines had appropriate filters. We have the technology; we need the action to follow through.

Australian scientists are often at the forefront of technological breakthroughs and innovations across the board, but we also have the potential to be environmental leaders. Hence CSIRO and other related environmental organisations deserve all the funding they get, and more.

In summary, our group is very supportive of all government regulations and initiatives to ban or phase out all single use plastics, but we also have the strong view that the thicker "re-usable" plastic bags also warrant government action.

Yours sincerely

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