

Enquiries: Jane O'Malley



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Plastic Bag Ban
Department of Water and Environmental Regulation
Locked Bag 33
CLOISTER'S SQUARE WA 6850
Email: plasticbagban@dwer.wa.gov.au

Dear Sir/Madam

Submission: Implementing a lightweight single-use plastic bag ban in Western Australia

Thank you for the opportunity to provide a submission in response to the Discussion Paper *Implementing a lightweight single-use plastic bag ban in WA*.

The Peel-Harvey Catchment Council (PHCC) are encouraged that the State Government is committed to implementing this policy and consider it the first major step towards a longer-term process of moving the WA community away from plastic packaging.

The (PHCC) is the NRM regional body responsible for the Peel-Harvey Natural Resource Management (NRM) Region. The following comments are provided within the context of our mission statement : 'as environmental stewards we will encourage and enable effective catchment management to create a healthier natural environment in the Peel-Harvey by building community education and capacity, influencing and leading critical thought and environmental pride, and exemplifying and implementing best practice'.

Plastic bags, litter in the environment and their effect on ecosystems and wildlife are significant concerns to the PHCC and our community. Anecdotal evidence from our staff and community suggests that the amount of all types of litter in the Peel-Harvey Estuary and other #Ramsar482 wetlands is increasing.

Over the past 2 years, in response to growing community concerns, the PHCC has supported a number of local initiatives in relation to litter and single-use plastics and their impact on the Peel-Harvey Estuary and other parts of the Peel-Yalgorup Ramsar Site, #Ramsar482

One such initiative was a litter pick-up event on the Coodanup Foreshore Reserve in late 2017 that collected 127 plastic packaging items on 2 km of beach, of which 25% were plastic bags and 35% was plastic food packaging. Of concern, plastic bait bags and ice bags make up a considerable portion of the litter on river and estuarine foreshores.



Two other examples of the community's concerns and actions in regard to single use plastics and litter are included in Attachments 1 and 2:

- Attachment 1 outlines the concerns of youth in regard to single use plastics and the establishment of the Heal Peel Campaign
- Attachment 2 provides a summary of impacts of plastic in the Peel-Yalgorup and International waterways, and a summary of the actions and views of a local community group, the Friends of Rivers, Peel (FoRP) who help manage #Ramsar482.

The above examples, and the government's survey work showing that 84% of respondents support a ban on lightweight single use plastic bags, are evidence that the time for this initiative has well and truly come.

The ban needs to have three primary components to be successful:

- a. Well-drafted, appropriate, enforceable regulations
- b. Changes in behaviours of shoppers, retailers and suppliers
- c. Monitoring, review and reporting.

Without these components, the ban will not have the desired effect of reducing single use plastic bags and litter, reduce waste going to landfill, or improve outcomes for ecosystems and wildlife.

Regulation/law

- 1) The PHCC notes the government's proposal is to ban bags <35 microns but **strongly supports a ban on all single use plastic shopping bags which are <70 microns** with the objectives of:
 - a. More strongly discouraging use of all plastic shopping bags
 - b. Reduction in the amount of plastic that ends up in landfill
 - c. Reduction in the harmful impacts on wildlife and ecosystems
 - d. Reduction in litter.
 - e. Avoiding use of finite resources where more sustainable alternatives exist.
- 2) The basis of the PHCC's position is that single use or very short-term applications of a persistent product such as plastic is not sustainable and is harmful to ecosystems and wildlife. Banning all plastic shopping bags up to 70 microns will shift retailers and consumers to use alternatives which can be used repeatedly and have a long lifespan. It will send a message, via legislation, that **single use of a material such as plastic is unwise and unsustainable and is no longer considered acceptable in our community**. This message through regulation must be matched by an even stronger message via traditional and online media.
- 3) The current **proposal to ban bags of <35 microns will not have the desired effect** of removing single use plastic bags from our shops. Instead it will shift many retailers to supply, and consumers to use, thicker plastic shopping bags less than 70 microns which will invariably end up in the environment or landfill after a few uses. Evidence of this is provided in the Northern Territory where bags <35 microns have been banned since 2011 and yet litter of

light weight and thick glossy plastic bags has increased (Keep Australia Beautiful NT; <http://kabcnt.org.au/woolworths-and-coles-plastic-bag-proposal/screenshot-2017-07-17-09-07-56/>, accessed 7 March 2018). While a <70 microns bag ban will not totally eliminate the supply and demand for plastic bags at shops, it will create a significantly greater barrier.

- 4) While it is the PHCC's preference that **an immediate ban of bags <70 microns occur**, the PHCC would accept a two-staged implementation with the first stage being ban of bags <35 microns by 1 July 2018, and then a ban of bags <70 microns within the following 24 months. It is noted that a two staged ban is also supported by the Boomerang Alliance (Position on Plastic Bag Packaging, https://www.boomerangalliance.org.au/plastic_bags, Accessed 7 March 2018).
- 5) All **biodegradable and compostable bags should be included in the ban**. Biodegradable bags that meet standard AS 4736-2006 only degrade in high temperatures that do not occur in terrestrial or aquatic or home composting environments. In the environment the bags break into smaller pieces - this means they still enter the marine environment as a full bag or small pieces (Boomerang Alliance, Position on Plastic Bag Packaging, https://www.boomerangalliance.org.au/plastic_bags, Accessed 7 March 2018).
- 6) The PHCC is **not supportive** of other approaches in place of a ban or additional to a ban, such as a **levy**.
- 7) The **ban should apply to all wholesalers, importers and retailers** who provide bags to their customers both in shop, online, and home-delivery, including all small businesses.

Behaviour change

- 8) While a significant proportion of citizens (54%) are already using alternatives to lightweight plastic bags, it is not yet the social norm in WA. To create a culture of change in regard to shopping bags, the government should **immediately commence a targeted social marketing and behaviour change campaign via traditional and social media**. This campaign should:
 - a. Explain to the community the reasons why Western Australia is moving away from single use plastic bags;
 - b. Help shoppers to find alternatives to the use of single use plastic bags. This may include alternative solutions when shopping, and at home where people may be currently reliant on re-using their plastic shopping bags as bin liners etc.

(The PHCC notes the South Australian experience where a plastic shopping bag ban led to a significant increase in the purchase of plastic bin liners. Hence, the DWER, government and businesses need to start influencing behaviours before the time people start making the switch in practices around 1 July 2018).

- c. Foster a culture of 'doing the right thing' and changing the social norms, so that the benefits of the ban are realised and do not end in unexpected consequences (e.g. citizens buying more light-weight rubbish bin liners).

- d. Encourage responsible behaviours, so that retailers and shoppers feel supported through the transition process, and shoppers understand it is a whole of community initiative, and, for example, not an opportunity to blame the person at the checkout.

Monitoring, review and reporting

- 9) It is important that DWER/government include a **monitoring and review process** to gauge the effect of the ban, any unintended consequences, and make necessary adjustments. The following should be surveyed/assessed before the ban, and then at appropriate intervals after the ban's introduction:
 - Total number of plastic bags used or sold in WA
 - Levels of plastic shopping bag litter
 - Attitudes towards the ban amongst shoppers and retailers.
- 10) The survey should be capable of assessing differences between city and rural/remote areas, given the significant problem of littering in rural and remote WA.

We look forward to the introduction of this initiative over coming months and thank you again for the opportunity to influence its introduction. If you have any queries or would like clarification please do not hesitate to contact me on [REDACTED]

Yours sincerely

[REDACTED]

Jane O'Malley
Chief Executive Officer

Encl: Attachment 1 - The Heal Peel Campaign

Attachment 2 – Impacts of plastic in the Peel-Yalgorup and International waterways

The Heal Peel Campaign

In 2017 PHCC partnered with The Makers to support the delivery of the Youth on Leadership Program and for advancing our shared goal of supporting young people to be active in addressing local issues.

The program provides the opportunity for the Youth on Leadership Group to target their community initiative towards addressing the issue of single use plastics and the impact they have on the local environment. This was a priority concern of the youth group and had expressed their desire to develop a project that tackles this issue.

The Youth on Leadership Group spent six months learning about the impacts of single use plastics through a variety of excursions and workshops. The Group were issued with the task to design their own campaign around reducing single use plastics and created the concept for the Heal Peel Campaign.

The Heal Peel Campaign is an innovative and exciting project that is designed to raise awareness to the impacts of single use plastics on the local environment and pilots an enviro-social marketing campaign that aims to reduce the use of single use plastics in the Mandurah community.

The Heal Peel Campaign will run from March 2018 -May 2018 and plans to promote the Youth on Leadership campaign on social media and host an event at the Mandurah Stretch Festival.

Impacts of plastic in the Peel-Yalgorup and International waterways

Rubbish in a wetland environment poses a huge risk to the wetland wildlife and the wetland ecosystem. Marine debris not only directly kills and injures wildlife, but leads to great economic costs and losses to people and communities worldwide, including health impacts. Entanglement and ingestion are the primary types of direct damage to wildlife caused by marine debris; it coats the bottom of waterways and is believed to be a source of toxic substances in the marine environment, (2017, kabc.wa.gov.au)

Marine debris has become one of the major environmental issues worldwide, with 8 million tons of plastic entering the ocean every year. It is estimated that by 2050 by weight we will have more plastic than fish in the ocean. Every year more than six million tonnes of rubbish is dumped into the world's oceans, 80 per cent of which is plastic. In just one square kilometre of ocean 18,000 pieces of plastic are estimated to float within it. In Australia 77 species are impacted by marine debris with 633 species worldwide. Over 75% of litter removed from beaches is plastic.

Plastics over time breakdown into smaller pieces called micro-plastics. Micro plastics and the toxins attached to them pose a direct threat on entire ecosystems (2017, <http://tangaroablue.org/>).

There are serious long term health and environmental consequences associated for people and the environment. Toxins attach themselves to the micro-plastics and these are then ingested by plankton and small fish. The toxins then become stored in the fishes' muscles. The toxins then get passed through the food chain; small fish are then consumed by larger fish and then in turn consumed by people. (<https://www.plasticoceans.org/film>)

Cleaning up waterways, beaches and coastal areas of litter is expensive and time intensive. It has been estimated that it costs governments, businesses and community groups over \$4 million a year to clean up littered plastic shopping bags. (2017, <http://tangaroablue.org/>)

In 2015-16 the NLI (National Litter Index) results for Western Australia indicate a 1.5% increase in litter by item and an 8% increase in litter by volume from the previous year. Butts, beverage containers and glass reduced, Takeaway packaging remained the same, while paper, other plastic, general other litter and illegal dumping increased. Beverage and takeaway packaging combine to be the next most littered item at 13.24 items per 1000m². (KAB Litter Index 2015-2016). Plastic bottles are among the top 10 offending litter items on Clean Up Australia Day. (2017, [cleanupaustraliaday](http://cleanupaustraliaday.org))



Local Community View - prepared by Friends of Rivers, Peel (FoRP)

Since 2004 FoRP have been doing an annual clean up of the Murray River from Pinjarra to, and including, the Delta Islands. That's 14 years of rubbish collecting. In addition, Channel Island and surrounding waterways have been cleaned up annually for over 10 years by the Mandurah Over 55s Canoe Club. Plus, the Serpentine River for 5 years with the Canoe Trail Friends of Mandurah and Pinjarra. There has been no noticeable reduction in volume or change in composition of rubbish picked up. In fact, from photos the volume appears to have increased, which is to be expected given the increase in population in the Peel Region. In 2016 a broadened community involvement "Clean up Peel Waterways" program was implemented with 18 groups participating, and in 2017 19 groups. Assistance was generously given by the Peel Harvey Catchment Council (PHCC), Shire of Murray (SoM), City of Mandurah (CoM) and Department of Parks and Wildlife (DPaW).

While what we have been doing is important and useful in cleaning up the waterways annually, it has not resulted in any apparent reduction in the amount of litter and rubbish in the waterways. Given the planned doubling in population, Green Growth Plan (GGP), the pressure on the Peel waterways will similarly increase, and action is needed now to prepare for that increase.

Unless steps are taken now to curb litter and rubbish entering the waterways, both will be major contributors to the continued degradation of the Peel waterways and be detrimental to the sustainability of the region's aquatic and aesthetic values, including the Marine Stewardship Council (MSC) certified fishery.

Given that what is being done by all agencies and groups currently, is apparently not having any noticeable effect, a new or different approach is needed.