



**Submission**

**Implementing a lightweight single-use  
plastic bag ban in Western Australia  
Discussion Paper**

**9<sup>th</sup> March 2018**

## Summary

The Bunbury Harvey Regional Council (BHRC) operates the Stanley Road Waste Management Facility and the Wellington Regional Compost Facility, Banksia Road. The BHRC support the banning of light weight single use plastic bags in Western Australia, but would also support further restrictions and legislation on other forms of plastics.



## Background

### **Stanley Road Waste Facility**

(Referred to as Stanley Rd)

Is a Class II landfill site receiving 80,000 tonnes of waste per annum, with 50% of this waste being diverted away from landfill for recycling (therefore achieving the waste diversion target of 50% for regional areas) Of the remaining 40,000 tonnes of waste going to landfill, 21,200 tonnes is commercial waste and 18,800 tonnes is municipal waste from the City of Bunbury and the Shire of Harvey.

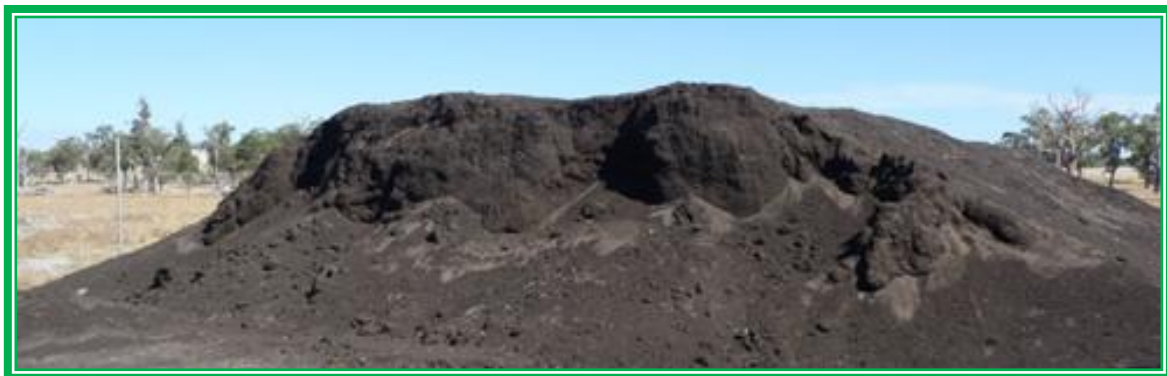
Amongst the waste entering the facility are many light weight plastic bags. Light weight plastics are a problem for the facility as they catch the wind easily and get blown into the nearby natural bushland, creating a concern for the environment. BHRC employs a litter picker up to three days per week to collect the wind-blown waste, most of which is light weight plastics including plastic bags.



## **Wellington Regional Compost Facility, Banksia Road Dardanup** (Referred to as the Compost Facility)

The purpose built compost processing facility was established in 2013. It currently receives 12,000 tonnes of kerbside organic waste from councils with the three bin system including City of Bunbury, Shire of Capel, Shire of Collie and the Shire of Donnybrook Balingup and converts this waste to rich compost which has also achieved organic certification in early 2017. The process of turning kerbside organic waste into compost has resulted in the four participating Councils achieving over 50% municipal waste diversion – far exceeding the state average of 36%. This is a proven method for councils to achieve the diversion targets under the waste strategy and we expect more Western Australian councils to develop similar organic collection and processing systems into the future.

The Compost Facility accepts and processes compostable bags (those which have past certification through the Australian Standard AS4736) and has done so successfully for the past 5 years. Audits of the Compost Facility have had consistently low contamination rates (between 0.5% - 5%), however a large portion of this contamination is soft plastics or light weight plastic bags. The plastic bags are often mistaken for compostable bags, especially if they are the same colour as the compostable bags provided by the local Councils. Alternatively, uncertified biodegradable bags are often confused as compostable bags and do not decompose effectively. BHRC hopes to see a significant drop in this type of contamination once the ban comes in.



## Bunbury Harvey Regional Council Recommendations

- ✧ The BHRC support the lightweight single-use plastic bag ban in Western Australia
- ✧ The BHRC believe the Government of Western Australia should implement further restrictions on light weight plastic bags, increasing the threshold of banned bags to bags below **70 microns** in thickness without compostable certification under AS4736 should be banned
- ✧ Commercial and industrial light weight plastics below **70 microns** should also be banned
- ✧ The BHRC believe bioplastics certified as compostable under AS4736 should NOT be included in the ban. Banning of these products will drastically halt the market and could negatively impact on the research and development in bioplastics. Further development of bioplastics could lead to better long term environmental outcomes (including products that have less impact if littered or enter the environment) and lead to an overall reduction of plastic use.
- ✧ The BHRC suggests that the heavier bags used as an alternative to single use bags (**above 70 microns**) must be made only of compostable material or 100% recycled plastic
- ✧ The BHRC support the ban of both degradable and uncertified biodegradable bags being included within the ban
- ✧ The BHRC believe there should be a distinction and separation of Australian Standards for compostable and biodegradable bags



## Responses to Consultation Paper Questions



### Questions for local governments and waste facility operators

Can you quantify the costs that will be avoided when the amount of lightweight plastic bags entering the waste stream is reduced and there is less contamination by lightweight plastic bags in recyclables? Are the savings likely to be passed on to ratepayers?

There will be no quantifiable cost savings to BHRC due to the reduced amount of lightweight plastic bags entering the Stanley Road Waste Facility or the Compost Facility at Banksia Road when the plastic bag ban comes into place.

BHRC receives municipal waste from both the City of Bunbury and Shire of

Harvey and there will be no financial link between a reduced amount of plastic being used by consumers and waste entering Stanley Road. Light weight plastic bags are only a portion of the light weight plastics entering the facility and creating litter or environmental hazards. The BHRC will continue to employ a litter picker to collect the litter from Stanley Road and hopes to see a reduction in light weight plastic bags, but expects to still see other forms of light weight plastics that need to be removed.

The BHRC hopes to see a reduction in the plastic bag contamination at the Compost Facility once the ban comes into place, although there will be no quantifiable saving as a result of this. The reduction in plastic bag contamination would assist in the compost facility producing a better quality product with less elements of plastic contamination within it.



### Question

Should biodegradable, degradable and compostable bags be included in the bag ban?

The BHRC support the banning of degradable and uncertified biodegradable bags, but do not support the banning of compostable bags. BHRC run a commercial compost facility receiving organic waste from the three bin system from four local councils and it

is expected that more and more Councils will soon come on board with kerbside organic waste collection and processing in order to achieve waste diversion targets. Commercial compost facilities are able to receive compostable bags (certified through the Australian Standard AS4736) which can be fully processed through the organics facility, however even if a certified compostable bag is landfilled, the landfill site should be capturing the methane gases created by the decomposition and reusing or flaring the gas. In this aspect, certified compostable bags have far less of an environmental impact than plastic bags.

There is a significant difference between compostable, uncertified biodegradable and degradable bags, with certified compostable bags being the only type able to be fully recycled in a local, circular economy via a compost facility. Although both biodegradable and compostable fall under the same Australian Standard the difference between the two mean that only compostable bags are able to breakdown completely. The Compost Facility maintains low contamination rates between 0.5% - 5% and is audited on a regular basis. Light weight plastic bags make up a large portion of the contamination that enters the compost facility; if all the bags were compostable the facility would be able to process them. The BHRC believes that the contamination of plastic bags will continue to some degree with the heavier weighted plastic bags and bin liners after the plastic bag ban comes into place.

The BHRC believe that a 35 micron bag will act the same in the environment as a lighter weight bag, and at least if this bag was compostable it would stand a much better chance of breaking down than a generic plastic one. This would also assist with those councils entering into the three bin system as the community would have a much better understanding about compostable bags and which can enter the system and which can't.



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 **Question for local governments**  
Can you foresee any unintended consequences arising as a result of the proposed compliance and enforcement regime?

BHRC believe it will be difficult to enforce the ban across the state of Western Australia given its size and the

capacity of the Department of Water and Environmental Regulation, and think the reliance will fall with the public and other businesses to report businesses not following the regulations.

***Bunbury Harvey Regional Council would like to thank you for the opportunity to provide this submission.***

***Kind Regards  
Tony Battersby  
CEO***