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1 March 2018

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

Via email: plasticbagban@dwer.wa.gov.au .

Dear Sir /Madam

SUBMISSION – LIGHTWEIGHT SINGLE-USE PLASTIC BAG BAN DISCUSSION PAPER

Thank you for the invitation to provide comment on the Discussion Paper released entitled *Implementing a lightweight single-use plastic bag ban in Western Australia*. Council considered a report on the paper on 28 February 2018 and resolved to:

Authorise the Chief Executive Officer to make a submission on behalf of the City of Fremantle on the Discussion Paper titled 'Implementing a lightweight single-use plastic bag ban in Western Australia', as follows:

Do you support a lightweight single-use plastic bag ban for Western Australia?

The City strongly supports the ban. The City considers the ban should apply to bags up to a thickness of 60 microns to mitigate the risk of retailer and consumer migration to heavier weight but still essentially single use plastic bags as described in the response to the next question below.

Can you foresee any unintended consequences arising as a result of the proposed compliance and enforcement regime?

The DWER discussion paper acknowledges that an unintended consequence of a ban on lightweight plastic bags could be that retailers supply heavier weight plastic bags for free. There is a real risk that consumers will start using heavier weight plastic bags in a similar fashion to single-use plastic bags. Indeed, in the discussion paper these heavier bags are referred to as 'single-use' (page 19). These bags should be relabelled as reusable, to encourage consumers to use them more than once. In addition, the City believes that if a levy on plastic bags is not currently feasible, the ban should include a regulation that retailers must charge for providing a heavier plastic bag, defined as a bag with a thickness greater than 60 microns, with the price reviewed on a regular (five year) basis. A price review is essential to ensure that consumers do not normalise the additional cost.

To ensure the community understands the reasoning behind the single-use plastic bag ban, and to assist in ensuring that they do not substitute the single-use plastic bags with thicker ones, it is essential that the ban is accompanied by an education campaign to inform the community about the negative environmental impacts of single-use plastics.

Would you support thicker department store bags being included in a ban in the future?

Given the risk that light weight plastic bags could easily be replaced with heavier weight plastic bags, the City would support thicker bags being included in a ban in the future. However as stated above, the City advocates that the proposed ban should apply to bags up to a thickness of 60 microns from commencement of the ban.

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?

Our response for this question is based on feedback from the South Metropolitan Regional Centre (SMRC), who receives the majority of the City of Fremantle's waste and recycling. The Executive Manager Strategic Projects indicated that costs will be avoided with a ban on plastic bags due to lower processing costs, maintenance and down times costs (avoidance of bags wrapping around machinery), landfill costs and waste transport costs. Benefits also include improved product quality of recycled materials with higher sales prices received, due to less contamination with plastic bags; and improved recycling recovery rates as some residents place their recyclables in plastic bags, which results in all the contents going to the waste stream.

The SMRC indicated that it is difficult to accurately calculate the actual cost benefits, however, the SMRC region could see estimated savings between \$200k to \$350k per annum, which represents approximately \$3 to \$5 per annum saving per household. This saving may be passed on to Local Governments through lower Materials Recovery Facility gate fees. The City of Fremantle is unsure at this stage how these savings will be passed on to ratepayers, and would like to reconcile the savings before commenting. It is possible that any savings will be redirected into improving other parts of the waste and recycling stream.

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

As degradable plastic bags break down into smaller particles causing microplastic pollution, the City strongly agrees that these bags should be included in the ban. Given that research has shown that biodegradable and compostable bags continue to cause harm to marine life in the same way that regular plastic bags do, these bags should currently be included in the ban. However, technology is frequently changing and should a plant-based compostable or biodegradable plastic bag that degrades readily in water become available on the market, the

Regulations should be reviewed to allow these bags. In addition, it is vital that consumer education continues to promote the use of compostable and biodegradable bags in other areas – ie. doggy bags, nappy bags and bin liners. Biodegradable and compostable options continue to be preferable over degradable or regular single-use plastics. Consumer education regarding compostable bags should include information on the need to dispose of compostable bags through suitable composters, and not through basic domestic composters or through disposal streams that could contaminate other types of recyclable waste material.

What other plastic pollution should the government, businesses and communities work together to address?

The government, businesses and communities should work together to address the following plastic pollution problems:

- The availability of plant-based compostable and biodegradable plastic products in supermarkets, including bin liners, doggy bags, nappy bags and single-use items such as cups, plates and cutlery. Most major supermarkets, such as Coles, Woolworths and IGA, do not readily stock these items and they must be ordered from specialty websites. It is important to educate the public that these items are more environmentally friendly than their polyethylene polymer counterparts, and to ensure these items are more readily available to purchase. It is also important to educate the public on disposal of compostable and biodegradable items so they do not contaminate inappropriate waste or recycling streams.*
- The provision of compostable doggy bags by Local Governments, particularly in those Local Government areas whose waste goes through industrial composters.*
- The impact of released balloons and the like, particularly on the marine environment.*
- Plastic drinking straws and bottled drinking water in single use lightweight bottles.*
- The extent of plastic packaging on a wide range of retail products, such as transparent 'bubble' packaging enclosing small electrical products, toys, etc. and consideration of ways to make implementation and compliance with the current Australian Packaging Covenant more effective.*

What strategies to address other plastic pollution do you think would be most effective?

- A national levy on single-use plastic products should be considered by the Commonwealth Government. The funds raised could be put towards research into alternative environmentally friendly products, or subsidising the availability of bioplastics – products made out of plant materials that have significantly lower carbon emissions.*
- An education program should accompany any enforcement regime or tax/levy.*

Please consider this letter the City's submission.

Should you have any queries regarding this matter, please contact either the City's Senior Project Officer – Sustainability Annabelle McGuinness or myself on [REDACTED].

Yours faithfully



Phillida Rodic
Manager Strategic Planning