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SURFRIDER FOUNDATION
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Department of Environment and Heritage Protection

Waste Policy Unit,

GPO Box 2454,

Brisbane, QLD 4001

27 February 2017

waste.paper@ehp.qld.gov.au

RE: Submission on Implementing a lightweight plastic shopping bag Ban in Queensland

Dear Sir/Madam,

Thank you for the opportunity to provide our views on the State Government Discussion Paper: *Implementing a lightweight plastic shopping bag ban in Queensland*

Boomerang Alliance is a membership-based community organisation dedicated to addressing Australia's waste issues, particularly plastic wastes. Our allies include major national, state and regional organisations concerned with litter, waste and plastic pollution.

To date we have been instrumental in successful campaigns for a Container Deposit Scheme for bottles and cans in NSW, QLD and WA and for a plastic bag ban in SA, NT, ACT and Tasmania, and now QLD. We look forward to other states such as NSW and Victoria following the progressive lead taken by QLD on plastic bags.

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Boomerang Alliance has 45 allied organisations and welcome the decision by the State Government to ban lightweight, single use plastic shopping bags, including 'degradable and biodegradable' bags.

The banning of these bags (35 microns and below) is consistent with existing bans (that excludes biodegradables) imposed by four other jurisdictions (SA, NT, ACT and Tasmania).

The ban, when implemented, represents a significant step forward in addressing Queensland's litter and plastic pollution problems.

In Queensland, it is officially estimated that 900 million-1 billion + plastic bags are used every year.[1]. A ban on HDPE bags will eliminate a vast majority of these from circulation, and avoid their wasting in landfill or littering of the environment. The litter is sourced from individual actions and as noted in the Discussion Paper also escapes from waste and recycling facilities. On a conservative basis of 2% of consumption being littered, some 20 million bags enter the Queensland environment every year. As well as harming marine life as a bag, they also contribute to the accumulating microplastic load.

We welcome the decision to ban lightweight, single use plastic bags in Queensland and include degradable and biodegradable bags in that ban. We welcome the fact that this has bi-partisan support. A ban will dramatically reduce the impact on wildlife, particularly sea turtles and sea birds. It will dramatically reduce the wasteful practice of dumping plastic bags in landfill and reduce fossil fuel use in the production of single use plastic bags.

Marine debris is identified as a major threatening process for the long term health of the Great Barrier Reef (LTSP 2050). A JCU study also found that reef corals were ingesting plastics and starving as a result. The CSIRO Marine Debris Report 2014 stated that 'two thirds of the rubbish found along our coastline in plastic, with most coming from local sources.'

The banning of plastic bags and the restricting of other plastic products found in the waste stream, will reduce marine debris and the plastic pollution problems for the Great Barrier Reef.

[1] This is a minimum. In the past industry estimates of consumption have been understated.

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The banning of single use plastic bags was supported unanimously in the 2016 Senate Inquiry Report on the impacts of Marine Debris in Australia.

However, a ban on lightweight plastic bags only represents a first step in addressing 'disposable' and littered plastic items. Our support for this measure is therefore linked to the state committing to further policy action on plastic packaging and other problematic plastics.

We note that the State Government, in announcing a plastic bag ban, has referenced this 'as a critical step in a long term Plastic Pollution Reduction Plan.'

We urge the State Government to include a number of other problematic items in its proposed ban and instigate an on-going continuous improvement process, either independently or with other jurisdictions, to identify other problem, single-use plastics, find and introduce suitable alternatives to these, or put in place measures to prevent these problem plastics from being used. We recommend the establishment of a taskforce for this purpose prior to the introduction of a plastic bag ban in Queensland, with a report back to government within one year from the introduction of a plastic bag ban.

Our comments are expressed below under these three components; our views on current QLD ban, additional items that should be added to the current policy and plastic items that should be include in future policy improvements.

As the discussion paper seeks views on four specific questions we have included our views on these questions.

The Current Proposed Ban

The Boomerang Alliance (BA) position, as reflected in a joint position by major, state and regional environment and community organisations in Australia (*Joint Position on Plastic Packaging February 2016*), supports a ban on single use HDPE plastic bags up to 70 microns. This micron range includes the heavier, department store type bag. However, our position adopts a phased approach that this could be introduced in two phases, starting with bags of 35 microns and below. The proposed ban on lightweight (under 35 microns) is therefore consistent with our position, as long as it is identified as 'phase one'.

Our position also includes the banning of lightweight, so called 'degradable or biodegradable' bags. We welcome the proposed ban that correctly includes both 'degradable and biodegradable' bags in the ban. We note that in November 2016, the

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South Australian Government, announced its intention to expand its ban to include 'degradable and biodegradable' bags. The Queensland Government position has helped advance this and should influence future states actions.

'Degradable' bags are designed to simply break into smaller pieces, making them resemble food for wildlife even more than standard bags. 'Biodegradable' are measured against an industrial standard and not against varied natural environment conditions. They also contain toxic agents to prevent decomposition and to make them fit-for-purpose. As a result, they decompose slowly, if at all, under many natural and marine environment conditions.

As a first step, the Boomerang Alliance and our allies acknowledge that the proposed ban in Queensland is consistent with our joint groups position.

We wish to re-iterate that the introduction of a ban must be associated with a public and retailer education program to explain the changes, why these are being made and the best alternative practices that can be adopted.

Excerpt from Boomerang Alliance/ Joint Position on Plastic Packaging February 2016

In our view the immediate and effective policy response from State jurisdictions on plastic bags and other single use plastic should be:

- To ban all single use HDPE bags up to 70 microns.[1] This ban should apply to all wholesalers, importers and retailers who provide these products to their customers both in shop and online, including all small business.
- The ban should include all identified 'biodegradable and degradable' bags up to 70 microns (standards used in current laws for biodegradability/compostability do not prevent microplastic pollution – see below).
- Specific purpose bags less than 70 microns such as barrier bags could be exempted, but only where there is a demonstrated health, food safety or fit-for-purpose reason and where no viable alternative exists. Any such exempted bags should be uncoloured and unbranded to avoid increased ingestion by marine life.[2]
- Ensure targeting of bait bags and ice cube bags which are usually used outdoors and represent a particular problem in the litter stream.
- The mass release of balloons should be banned.
- Packaging providers and retailers should be encouraged to put forward additional recommendations about other forms of single use plastic packaging that could be replaced or avoided.
- A transition period of 6 months should be established between an announcement and introduction of any bans, to allow for alternative arrangements and a public/retailer education program.
- An effective penalty and resourced compliance regime.
- A levy not be supported due to administrative complexity and the lack of long term impact.

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Additional Actions

As outlined above, Queensland policy measures should be expanded to include, in the first instance, other identified problematic plastic items that are often important components of the litter stream and particularly dangerous to wildlife.

The three most obvious products/practices are helium-filled balloons, bait bags and heavier LDPE plastic bags.

Mass release of Helium Filled Balloons

Include a ban on the mass release of helium balloons in Queensland. Mass releases of these balloons is an act of mass littering under the WARR Act in the first place, and should not be permitted or endorsed by State or local government agencies. These balloons also pose an unacceptable impact on wildlife.

In studies of dead Moreton Bay sea turtles conducted 2006-11, researchers found that pelagic turtles had a preference for floating rubber debris, of which 78% was found to be balloons. Dr. Jenn Lavers, from the Institute of Marine and Antarctic Studies, says she finds balloons "in about one in 20 of every sea bird I examine".

They also found a correlation with colour with most balloons found in stomachs either being red or orange. A similar finding was made about debris found in Short-Tailed Shearwaters (Lord Howe Island) where red and orange balloons were the majority found. These, by colour, most closely resemble Red Arrow squid, a food source for both species.

US Fisheries and Wildlife studies estimate that these balloons take as long as 12 months to degrade. Research conducted by Dr. Kathy Townsend at UQ's Moreton Bay Research Station on Stradbroke Island, indicated that this decomposition rate took much longer when the balloon was floating in salt water.

We note that the State Government already has an administrative ban on mass releases at any government associated events.

Any ban on helium balloon releases should have an associated public awareness program to explain the dangers and threats posed by helium balloons to the environment and wildlife.

We note that helium is a scarce resource vital for many medical procedures, using the gas

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for balloons is not the best use of the resource.

Bait Bags

Bait bags represent a major litter problem as they are often discarded at fishing spots by some fishers. There are an estimated 3 million used in Australia annually. There have been proposals to provide bait in biodegradable bags but this practice has never eventuated.

However, the problem with biodegradable bait bags is that they would be seen as 'environmentally friendly' and therefore more likely to be littered. We support the practice of using re-usable containers for bait. These could either be self-provided by fishers or provided by bait shops with a take-back scheme put in place. Single use bait bags should be included in the current ban measure

LDPE Bags

Heavier, department store plastic bags (predominantly LDPE) are identified in the Discussion Paper as a problem, with the suggestion that they be the subject of voluntary action to reduce their use. We note that the National Litter Index estimates that heavier LDPE bags represent 38% of plastic bag litter.

BA recommends that LDPE bags be included in the ban but allow case by case exemptions where the retailer can demonstrate effective management and/or minimal risk of reaching the marine environment.

If these management processes cannot be demonstrated we recommend an immediate ban or levy be imposed, as part of the current policy measures.

Given the intention to seek a voluntary reduction approach, the measures most likely to be considered under voluntary action anyway are on-going customer education programs by retailers, a phase-out/ban or introduced levy. Retailers are unlikely to favour an on-going education program only, so a phase-out or levy would be the options chosen. In which case why not introduce these measures now?

With a ban on lightweight bags introduced in 2018, will supermarkets supply heavier bags as an alternative, and at a cost? If so, does it not make sense to address heavier bags now and avoid confusion and differing retailer approaches later.

The solutions are well known and simply a matter of when their introductions are timed.

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A Continuous Improvement Process for Addressing Disposable, Single Use Plastics

Excerpt from Boomerang Alliance/Joint Groups Position February 2016

An Intermediate Policy Response (a continuous improvement strategy) should be:

- The establishment of an expert taskforce to review and report back to government within one year on recommended actions to restrict other forms of single use plastic packaging not included in the immediate policy. This review should include the identification of alternative products and practices to single use plastic packaging.

The BA and joint groups position calls for an expert taskforce to identify and report back to government on recommended actions to restrict other forms of single use plastic packaging. We recommend that this process and taskforce be established as soon as practical, ideally with other jurisdictions.

Boomerang Alliance has identified a number of single use plastic items that should be included in the first review of policy action. We suggest that an ongoing *Continuous Improvement Improvement Strategy* be adopted so that the State can address all problematic plastics in the future. We have listed initial products with some suggested indicative policy action.

These include:

ITEM	**ALTERNATIVE PRACTICE**
Plastic water bottle	Use Reusable bottle/collection through a CRS
Polystyrene/plastic coffee cup/lid	Ban and use reusable/paper cups/lids
Plastic straw	Ban/use reusable item
Plastic food ware (plate, knife, fork, spoon, cup)	No single use plastic/ only reusable/compostable products
Plastic bags	Subject of QLD ban
Heavier plastic bags	Include in ban/introduce levy

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Plastic Bin Liners	Not used/possible limited use of biodegradable bag
Identified personal care products	No plastic microbeads/containers should either be reusable or compostable
Takeaway containers	Not used/only BYO/compostable products
Polystyrene packaging	Banned/ subject to EPR on reusable-recycled packaging
Plastic film (food packaging)	Avoid/alternative wrap
Helium balloons	No mass releases
Bait bags	Use own reusable container/leave bag at bait shop/take back scheme
Fishing Tackle	Take home/place in dedicated collection bin
Polyester clothing	Avoid/use natural fabrics. Introduce filters in washing machines
Six pack ring pulls/plastic wrap around products	Not to be used/ or use genuinely compostable alternatives
Beverage Containers (glass, aluminium and plastic)	Subject of CRS in QLD
Retailer Plastic Packaging (food/putrescible) Including barrier bags, trays, plastic film and bags without handles	Review unnecessary packaging/health and safety requirements/identify alternative practice and product
Retailer Plastic Packaging (non-putrescible)	Eliminate secondary plastic packaging/review health and d safety requirements/identify

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Including barrier bags, trays, plastic film and bags without handles plus secondary packaging	alternative practice and products
Microplastic litter-film, pellets, fibres, beads and fragments derived from plastic products (eg. Clothing, tyres, cigarette filters	Remove from use, find alternatives, impose financial penalties for littering Awareness campaign

Implementing a lightweight Plastic Shopping Bag Ban in Queensland

The Questions the Discussion Paper asks

1. **What are the appropriate timeframes and transitional arrangements to implement a plastic bag ban in Queensland?**

We want a ban to be implemented as soon as practical and certainly by 2018. However, it is important that it is implemented properly and fully understood, so it is effective. A key feature prior to the introduction of a ban is an education program for both consumers AND retailers. Everyone needs to understand why a ban is being put in place and what alternative practices they should follow. It is important that these education programs are properly funded and achieve their outcomes. Boomerang is willing to assist in the public education efforts. It is important that the ban applies to all retailers and is introduced at an appropriate time.

2. **Do you agree that biodegradable bags should be included in a ban?**

Absolutely. Degradable bags are designed to break into smaller pieces and resemble food for wildlife even more than standard plastic bags as a result. Biodegradable bags contain toxic agents to slow down their decomposition when in contact with liquid-so that they can be useful as a carrier bag. This means that they decompose slowly in the marine environment. Some experts estimate it takes up to two years to decompose. By that time, they have already done the damage. Because they are 'biodegradable' they tend to be littered more as consumers think that they are okay to discard, because they are biodegradable!

3. **Do you support the Queensland Government working with other states and territories to encourage industry to reduce the number of heavier weight plastic department store bags?**

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We need to reduce and eliminate all so called disposable plastic items. They all end up in landfill, which is not a good choice or littered in the environment. Landfill is the largest single point source for littered plastic bags and wind-borne plastic litter. Alternatives to thicker bags, such as consumers just using their own bags, must be encouraged. The best way to do this is ban thicker bags or put a price on them.

4. **What else can be done by the Queensland Government to address plastic pollution?**

The release of helium balloons in Queensland should be added to the plastic bag ban now.

Similarly bait bags and heavier LDPE bags should be added.

Other problematic and so called 'disposable' plastic items such as polystyrene cups and plates, straws, plastic food ware, and assorted plastic packaging and food trays should be added to a list of problematic plastics for future policy consideration. Discarded fishing tackle is a significant litter problem.

Microplastics-fibres, film, pellets and beads also need to be managed either through bans, take back schemes, filtration systems or simply using alternative, non-disposable, items. Cigarette butts are plastic fibres and usually contaminated with chemicals. Microplastics are increasingly recognised as an emerging problem for the environment, wildlife and human health. The State needs to seriously examine these.

All plastic litter will eventually break into smaller pieces and become microplastics.

Micro plastics are pieces or fragments of plastic products that range from nanometres to a few millimetres in size. They are usually fragments of film (bags, wrappers), foam (packaging, polystyrene, tyres), pellets (microbeads, nurdles) or fibre (clothing, cigarette filters)

Microplastics are now accumulating in the marine environment, and due to their small size are more readily eaten or absorbed by marine creatures. Many studies show that shellfish and corals are digesting them. (EU study on Shellfish plastic contamination/ARC study of GBR Corals 2014)

Synthetic plastics are derived from oil and have, depending upon their use, other compounds and chemicals added. When discarded they tend to break into their constituent parts, except in the aquatic environment where they tend to remain intact at a microscopic level.

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Plastic products and materials are made using fossil fuels. Reducing plastic use reduces our toxic load and reduces greenhouse gas emissions.

The draft Boomerang Alliance *Threat Abatement Plan on Marine Plastic Pollution* (released November 2016) outlines the impacts and potential policy responses to microplastics in the environment.

Microplastics Incident Example (Brisbane)

Last year Boomerang Alliance found microplastics on a beach in Manly (Manly Foreshore Park) What we found was alarming and the highest concentration of microplastics in the one location we have ever discovered. Our initial examination revealed < 400 pieces of microplastics per square foot. The microplastic concentrations covered the whole beach area. Clearly, under the right weather conditions, this plastic would be washed into Moreton Bay.

These microplastics were obviously coming from the adjacent playground, which had been left to fall into disrepair. Since that time, we are pleased to note that the playground is closed and being re-surfaced by Brisbane City Council. However, this represents an instructive example of how microplastics can contaminate a local environment and potentially cause huge impact on wildlife as a result.

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Conclusions

As outlined in the Discussion Paper, The Queensland Government decision to ban lightweight, single use plastic bags will make a difference by dramatically reducing the number of plastic bags in circulation. It will also encourage new habits and build community awareness about a range of other problematic plastics. We welcome the introduction of this ban, and including 'degradable and biodegradable' bags as soon as practical.

With a proposed plastic bag ban to be introduced in July 2018, BA urges EHP to enact legislation as soon as possible. To allow sufficient time for retailers to prepare and public education programs to be delivered, we believe it would be prudent to have legislation through the house by September 2017.

Other problem plastic items as identified above should be include.

Importantly, this ban should be seen as a first step, with a *Continuous Improvement Strategy* adopted that will effectively, and as quickly as possible, reduce Queensland's litter and plastic pollution problems and build a more resilient and healthy state for the future.

Jeff Angel

Director

Boomerang Alliance

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Australian Marine Conservation Society

Arid Lands Environment Centre

Beach Patrol

Boomerang Bags

Cairns and Far North Coast Environment Centre

Clean Up Australia

Conservation Council ACT Region

Conservation Council of South Australia

Conservation Council of Western Australia

Cooks River Alliance

Cooks River Valley Association

Environment Centre NT

Environment Tasmania

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Friends of the Earth

Gold Coast and Hinterland Environment Council (GECKO)

Green Music Australia

Greenpeace Australia Pacific

Householders' Options to Protect the Environment (HOPE)

IDEP Foundation

Lake Macquarie Sustainable Neighbourhood Alliance

Lane Cove Sustainability Action Group

LEAD Group

Living Ocean

Local Government NSW

Mineral Policy Institute

Nature Conservation Council of NSW

North Queensland Conservation Council (NQCC)

Plastic Bag Free Victoria

Plastic Free July

Positive Change for Marine Life

Project AWARE Foundation

Queensland Conservation Council

Responsible Runners

SEA LIFE Conservation Fund

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Sunshine Coast Environment Council (SCEC)

Surfrider Foundation Australia

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Tasmanian Conservation Trust

Total Environment Centre

Two Hands Project

Wildlife Preservation Society of Queensland

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