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RE: Submission on the draft Commonwealth Threat Abatement Plan (TAP) for the Impacts of Marine Debris on Vertebrate Marine Life

Dear Sir/Madam,

Thank you for the opportunity to provide a submission on the draft *THREAT ABATEMENT PLAN for the Impacts of Marine Debris on Vertebrate Marine Life* (TAP).

The Boomerang Alliance comprises 47 allied groups who have adopted the goal of a 70% reduction in plastic pollution of our marine environment, by 2020. Last year we issued our draft Threat Abatement Plan¹ for marine plastic pollution (BA TAP) which had a wide ranging

¹ D West - https://d3n8a8pro7vhmx.cloudfront.net/boomerangalliance/pages/494/attachments/original/1480367461/TAP_Final_28112016.pdf?1480367461

ambit, broader than the species focus of the Commonwealth TAP. Nevertheless its recommendations have significant relevance to the government's document.

The 2016 bipartisan Senate Report, 'Toxic Tide: the threat of marine plastic' contains an alarming survey of data and conclusions and important recommendations.

We acknowledge that the current draft TAP is a major advance on the previous version and urge additional work to improve it further. Importantly the TAP does not argue for more research as a precursor to action and this is to be commended. However, while funds are allocated to research (for example remote coastal waste to energy), monitoring and a small amount to coordination – there is little concrete support for actions. The TAP appears to assume once meetings and teleconferences occur – action will follow. Our view is that the issue needs to be elevated to a level where much more substantial funding and coordinated action **will rapidly eventuate** in recognition of the urgency of the issue.

Consequently while many of our BA TAP recommendations apply to Commonwealth or joint Commonwealth/state action – as a first step the Commonwealth Minister for the Environment should, '*place marine plastic on the Council of Australian Governments (COAG) agenda for urgent consideration.*' (Senate Rec 8). This meeting should occur in 2017 and state governments should come prepared with legislative and funding programs that fit with their responsibilities, current actions and agreed priorities. For example, it has been agreed that states will pursue plastic bag bans and seek to harmonise them; and that if the industry program on the removal of microplastics fails, then legislation will be passed. Similarly we note that state based marine plastic pollution action plans will be necessary (Qld is preparing one) and the Commonwealth should assist with resources.

Following this meeting, combined deadlines, targets and goals should be produced. Notably the TAP has vague timings and no goals that seek to give a deadline for a reduction in plastic pollution.

We also urge consideration of economic instruments. For example, a levy on the textile industry to help fund installation of washing machine filters on existing machines.

Additionally neighbouring countries such as Indonesia need extra assistance to implement waste reduction and recycling strategies. For example, in 2011 Australian Aid commissioned SMEC to produce a solid waste management strategy which in part targeted key issues such as packaging and EPR.

A full list of our recommendations and deadlines follows:

RECOMMENDED ACTIONS

Aspect	Action	Responsibility	By	
1. Leadership	1.1	Australian Government should urgently seek to work with our neighbouring countries to develop improved standards to manage plastic waste and MPP, with a focus on improving international agreements (Law of the Sea, MARPOL etc) in eliminating MPP and forming regional agreements to tackle specific regional issues (e.g. Ghost Nets, Regional Dumping at sea, strategies to address potential biological invasions associated with MPP, assistance to implement MARPOL, aid from developed nations for developing neighbours).	Australian Minister for Foreign Affairs	6/'17
	1.2	The Australian Government, in collaboration with state, territory and local government must deliver an effective MPP Threat Abatement Plan (TAP). The TAP should set hard targets for mitigation and abatement of plastics found in our environment along with specific milestones. The TAP should be sufficient to eliminate at least 70% of plastic with the potential of reaching the marine environment.	Australian Environment Minister	12/'17
	1.3	MPP should be placed on the COAG Agenda for the first meeting in 2017, with Ministers to agree on their approach to tackling MPP and the key priorities they will focus on. The meeting should endorse the need for coordinated national action and need for a TAP.	Australian Environment Minister	6/'17
	1.4	Australian Government and each state and territory should recognise the threat presented by the growing amounts of plastic in our marine environment and announce that the reduction of MPP is a priority of the highest order.	Federal, State and Territory Environment Ministers	11/'16
	1.5	MPP should be a priority for all state, territory and federal governments. Accordingly, MPP should become a permanent standing item for discussion at a meeting of environment ministers at least twice each year.	Australian Environment Minister	11/'16
	1.6	A working group, under the auspices of the meeting of environment ministers, be established by the beginning of 2017 to address specific matters related to MPP and to discuss progress of the TAP on a quarterly basis.	Australian Environment Minister	11/'16
	1.7	Each state and territory should instruct its environment agency to develop a strategy to reduce MPP through strengthened regulation and improved enforcement of regulations relating to the manufacture, distribution, recycling and disposal of plastic and synthetics.	Federal, State and Territory Environment Ministers	3/'17

2. Research	2.1	<p>Australian Government will provide at least \$2.5million p.a. for a minimum of 5 years in funding and active cross-departmental support research covering:</p> <p>I. the effects of marine plastic pollution in Australian waters, including:</p> <ul style="list-style-type: none"> • the extent of marine plastic pollution; • the sources of marine plastic pollution; • to identify the extent of ghost nets in Australian waters, and to identify means to prevent the loss of fishing gear; • the effects on ecosystems particularly in the Great Barrier Reef. 	Australian Minister for Industry, Innovation and Science	7/'17
		<p>II. the threat posed by microplastic pollution, including research to:</p> <ul style="list-style-type: none"> • identify the extent of microplastic pollution; • evaluate the effects of microplastic pollution on marinefauna; • evaluate the effects of microplastic pollution on ecosystems; and • identify mitigation measures; and <p>III. the threat posed by marine plastic pollution, particularly microplastic, on human health.</p>		
	2.2	State and Territory Governments should (jointly) match Federal Government Research funding on a dollar for dollar basis.	State & Territory Environment Ministers	7/'17
	2.3	The Australian Packaging Covenant Industry Association and key APC Industry Associations with material interests in the plastic production and consumption cycle (PACIA, the AFGC, ACOR, Packaging Council of Australia etc.) should match Federal Government research funding. This research should focus on the development of innovative solutions to mitigate plastic pollution, eliminate litter, and explore alternatives to plastic packaging.	Australian Packaging Covenant Council	7/'17
	2.4	Australian Governments should work closely with Clean Up Australia, Tangaroa Blue and CSIRO amongst others to establish a national marine plastic pollution database by July 2017 to identify and track plastic litter, marine debris and microplastics along our shores and waters.	Australian Department of Environment and Energy	7/'17
	2.5	Improving data collection and citizen science is a critical aspect to better understand the extent, nature and impact of MPP. Federal Government should provide long term funding to both Tangaroa Blue and Clean Up Australia to improve the data capture and collation tools along with adequate administrative resources to manage the database.	Australian Department of Environment and Energy	7/'17

3. Capacity	3.1	The ongoing growth in community education, citizen science, policy development and clean-up efforts have become essential aspects to address MPP; yet the lead organisations coordinating these activities receive no specific support for their work: Australian Government should extend GVEHO Grants, specifically for their MPP work (which attracts additional housing and administrative costs to their general purposes) towards those ENGOs that lead specific aspects of the combat to tackle MPP. They include: GhostNets Australia (Ghost Nets), Clean Up Australia (Community Clean Up efforts), Tangaroa Blue (Marine Debris), Boomerang Alliance (Policy and coordination of responses to gov't policy), Australian Marine Conservation Society (Marine Biodiversity).	Australian Environment Minister	7/'17
	3.2	It is important that there is a community group responsible for coordinating community response at a state level. State and Territory Governments should identify that organisation and provide appropriate administration grants to support their work.	State & Territory Environment Ministers	7/'17
	3.3	All coastal councils should urgently seek to provide financial and administrative support to local beach and coastal clean-up groups operating in their municipalities.	Local Government	4/'17
	3.4	Action on MPP is undermined by misinformation about plastics and marine plastic pollution and a lack of coordinated community and school education regarding the issue. State and Territory Governments should seek to develop a suite of information regarding what plastic products can and cannot be recycled, MPP sources and impacts and simple actions households can take to reduce their plastic pollution footprint.	State & Territory Environment Ministers	4/'17
	3.5	The Commonwealth, Qld, Tasmania, NT, and WA Environment Departments have inadequate staff in waste policy and enforcement to be able to address waste and recycling, let alone addressing specific aspects of MPP. All relevant Ministers should look to immediately increase their Departments capacity through a specific budget to address MPP, its sources and abatement.	Relevant Environment Ministers	7/'17
4. Plastic Pollution by Maritime Industry	4.1	The Australian Government should: <ul style="list-style-type: none"> Develop innovative technologies for the tagging of fishing gear and support the introduction of these technologies by the Australian-based fishing industry, and by fishing industries in regional countries; undertake a review of current government arrangements to detect and remove ghost nets (both in Northern Australia and Tasmania); develop a nationally consistent strategy to ensure that ghost nets are recovered in the Australian Fishing Zone, and coastal waters. 	Australian Minister for Agriculture and Water Resources	7/'18
	4.2	Federal, State and Territory Environment Ministers should form a working group to develop an ADF style Product Stewardship scheme for the SE Asian / Oceanic Region across the maritime industry to ensure all nations within our region can target the recovery of lost cargo, fishing gear and waste at sea.	Federal, State and Territory Environment Ministers	7/'17

	4.3	Australian cruise operators should develop a template operations manual for the management of on-board waste. This should include managing passenger litter and the prohibition to sell products in plastic packaging or wrapped in plastic film.	Australian Cruise Association and other tourism industry bodies	4/'17
	4.4	State and Territory Governments should introduce legislation to ensure that details of waste reception facilities for ships are included in port environment plans.	State Port Authorities	7/'17
	4.5	Introduce regulations requiring all ships to maintain logs books recording lost fishing gear.	Australian Maritime Safety Authority	12/'17
5. Producer Responsibility Schemes	5.1	All Australian states and territories to have commenced Container Deposit Systems before the end of 2020.	Qld, ACT, Vic, Tas and WA Environment Ministers	7/'18
	5.2	At their first meeting of 2017, Federal, State and Territory Ministers should form a working group to investigate the introduction of a take back scheme for plastic takeaway food packaging and disposable cups.	Federal, State and Territory Environment Ministers	7/'17
	5.3	Federal, State and Territory Ministers should form a working group to investigate the introduction of an Advance Disposal Fee on cigarette butts to fund community and local government litter clean-up efforts.	Federal, State and Territory Environment Ministers	7/'18
6. Product Bans	6.1	Introduce A ban on all single use plastic bags.	Federal, State and Territory Environment Ministers	11/'16
	6.2	There is urgent need to provide a regulatory underpinning for the Federal Government phase out to prohibit the importation, manufacture, distribution or sale of personal care, cosmetic and household cleaning products containing microbeads.	Australian Environment Minister	11/'16
	6.3	Polystyrene Packaging is a significant problem in the marine environment, combined with a 'precautionary approach' regarding concerns over polystyrene's potential to leach styrene into food means that takeaway food packaging and disposable cups should be prohibited for importation, manufacture, distribution or sale in Australia.	All Federal, State and Territory Environment Ministers	7/'17
	6.4	There are a range of secondary sources of MPP that are unnecessary and can be readily replaced by non-polluting alternatives. The prohibition of these products and packaging has minimal industry impacts and should be banned. They are: <ul style="list-style-type: none"> • Helium filled balloons • Disposable plastic straws (though LPB straws are acceptable) • Hi Cones (plastic 6-pack ring holders) • Ice cream and lollipop sticks (which can be readily substituted for timber or other biodegradable products) 	All Federal, State and Territory Environment Ministers	7/'18
7. Mandatory Product Design Requirements	7.1	Require all domestic washing machines to be fitted with microfibre filtration systems on the machines outtake; and broader sewerage filtration systems be fitted to all commercial laundry and dry cleaning businesses.	All Federal, State and Territory Environment Ministers	12/'17

	7.2	Plastics manufacturing, recycling and waste facilities should require an environmental license issued by Environmental Regulators. These licenses should require compliance with Operation Clean Sweep standards (ran by BA Ally Tangaroa Blue) for all plastics manufacturers and be expanded for application to capture fugitive microplastic losses in plastics recycling, reprocessing and waste management facilities. This initiative should be accompanied by strengthened regulations and a commitment from environmental regulators to enforce existing regulations.	All Federal, State and Territory Environment Ministers	4/'17
	7.3	A major source of MPP is packaging, which includes the much-neglected tertiary packaging (packaging used for shipping). The use of polystyrene 'peanuts' for padding in shipping cartons and plastic foam sheets is unnecessary and can be readily replaced with alternative biodegradable packaging made from bagasse or other organic sources. The APC should trial a voluntary effort but if 70% of this type of plastic packaging has not been eliminated within 3 years it should be replaced by a regulatory scheme in late 2020.	Australian Packaging Covenant Council	12/'17
8. Regulation	8.1	The loss of plastics during waste management and recycling is a major source of MPP in Australia that is both unnecessary and unlawful. Waste and recycling facilities are obliged to ensure they maintain of all waste that comes into their control and they must ensure they have adequate infrastructure to capture: light weight plastic bags and films; residual	All Federal, State and Territory Environment Regulators	4/'17

		microplastics; & tiny plastic fibres and dusts generated during shredding need exhaust systems to stop them escaping the premises. All state environment regulators need to take immediate action to enforce existing laws and stop this unnecessary pollution.		
	8.2	Like the waste and recycling industry, plastics manufacturers are obliged to ensure any waste they generate is controlled within their site until it is collected by a waste company. The loss of plastic resin pellets (nurdles) and flake (the recycling based substitute for pellets) are far too common and are readily avoided. All state environment regulators need to take immediate action to enforce existing laws and stop this unnecessary pollution.	All Federal, State and Territory Environment Regulators	4/'17
9. Product Standards	9.1	Introduce product standards for all plastic packaging and products manufactured or imported for use in Australia. This standard should require the product or packaging to display a Plastic Identification Symbol and a bar code. Where packaging is a composite material that includes plastic it should be required to clearly outline what those materials are (to aid recycling) and a level of standardisation adopted so that Material Recovery Facilities (MRF) can separate materials with confidence.	All Federal, State and Territory Environment Ministers	12/'18

	9.2	The Australian Packaging Covenant (APC) Council, in Partnership with PACIA should authorise work to develop a standard on what is recyclable in Australia. This should be based on a survey of local government and defined by those materials that are currently collected by most MSW kerbside recycling services. Standards should provide guidance to packaging manufacturers on design requirements to ensure recyclability and labelling. The use of recycling symbols should be better policed.	Australian Packaging Covenant Council	12/'18
10. Planning	10.1	State Planning Authorities should develop a 'planning for plastics program', using a tool like the NSW 'Basix' program. This should require large commercial and industrial projects to outline how they will minimise the use of disposable plastic, the infrastructure to capture fugitive plastic waste and management regimes for the handling of plastic waste and litter. Sectors that should address plastic waste and litter in development applications include: <ul style="list-style-type: none"> • Waste and recycling facilities; • Plastics manufacturing, extrusion and injection moulding facilities; • Large accommodation, resorts, tourist attractions, theme parks located within 1klm of the coastline or an estuary; • Take away, cafes, restaurants and hotels; • Waterfront precincts like Southbank (Vic), Darling Harbour (NSW), Cavill Mall (Qld), etc. • Shipping terminals, Ports, and Marinas • Construction sites • Major sporting venues and events. 	All State and Territory Planning Ministers.	7/'19

The Boomerang Alliance supports urgent action and is willing to further assist. As is well known – plastic pollution does not go away and accumulates in increasing dangerous amounts in our marine environment.

Jeff Angel
Director