



Reducing the impacts of plastics on the Victorian environment

Submission

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While this paper aims to broadly reflect the views of local government in Victoria, it does not purport to reflect the exact views of individual councils.

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Introduction

The Municipal Association of Victoria (MAV) welcomes the opportunity to respond to the Department of Environment, Land, Water and Planning (DELWP) 'Reducing the impacts of plastics on the Victorian environment' discussion paper.

The MAV is the statutory peak body for local government in Victoria. Formed in 1879, we have a long and proud history of representing and advancing the interests of all Victorian councils.

The MAV supports the introduction of a ban on single-use plastic bags. We also want strong action take on a range of other plastic waste issues, many of which are canvassed in the discussion paper.

We note that the timing of the release of this discussion paper coincided with requests for input from the Victorian government regarding a range of proposed waste-related reforms, including the e-waste landfill ban and waste to energy policy. While we support and welcome reform in the waste management space, we note that with each reform process comes a need and obligation to engage with and educate the community.

Recent media coverage of waste management issues, such as the ABC's War on Waste, highlights that the community is largely ignorant of the impacts of their behavior on our environment. It is critical that the introduction of a ban on single-use plastic bags is preceded by and supported throughout the life of the ban with a strong community education campaign that clearly explains why the ban is needed and how individuals can make a difference.

We also note that greater pressure is needed upstream, on those industries manufacturing and applying plastics, to foster a product stewardship approach that would mean end of life (disposal) of a product is kept in mind at the design stage.

Why is this a local government issue?

The voice of the community

As the level of government closest to the community, local government has a unique opportunity and responsibility to give voice to the ideals, views and concerns of that community. This responsibility to advocate on behalf of its community is enshrined in the *Local Government Act* 1989. Recent media coverage of waste issues, including the impacts of plastic waste, has raised public awareness and support for strong government-led action on single use plastics. The community is increasingly demanding that local government not only take action at the local level but also advocate for change at the state and national levels.

Landfill and recycling

Councils play a significant role in the waste management system in Victoria, providing various waste and recycling services and facilities, including landfills and transfer stations. Plastics are an important issue in the waste sector because they:

- contribute to the overall volume of waste
- take a long time to degrade in landfill
- are often difficult to recycle
- can cause mechanical problems (flexible plastics)
- are difficult to recapture (flexible plastics)

Litter enforcement

Councils are a litter authority under the *Environment Protection Act 1970* and are able to authorise officers to enforce litter provisions of the Act. Many councils employ dedicated litter enforcement officers and act as the primary on-the-ground enforcement agency for litter offences.

Current local government action

Councils actively pursue and support a range of initiatives aimed at reducing the prevalence of single-use plastic bags and plastic waste more broadly. Numerous councils have implemented policies banning or minimising the use of single use plastics at events on council land, and promoting alternatives such as reusable bags and water bottles. Surf Coast Shire's Plastic Wise Program was one of the first council policies adopted in this space and has served as an inspiration for several other Victorian councils.

Several councils have worked with groups such as Plastic Bag Free Victoria, Responsible Cafes, Boomerang Bags or the Last Straw to support their campaigns targeting single use plastics. Councils also support and work with "friends of" groups and local environmental groups focused on cleaning up plastic waste.

As noted in the discussion paper, Boroondara, Cardinia, Nillumbik and Hobsons Bay councils offer residents flexible plastic kerbside recycling. The program is assisted by state government funding, and follows an earlier pilot by Darebin City Council. In addition to securing contracts for the recycling of flexible plastics, a large focus of the program has been on behaviour change amongst the community.

Discussion paper questions

Do you support a ban on single-use lightweight plastic shopping bags?

The MAV supports a ban on single-use lightweight plastic bags. A state-wide ban sends a strong message of societal values and the seriousness of the issue and may prompt wider consideration of consumption and waste by the community.

At the October 2017 MAV State Council meeting it was resolved that the MAV should congratulate the Victorian Government on its decision to introduce a ban and call on the Government to design a process that delivers an effective and lasting ban and to introduce the ban as soon as possible.

In order to enhance community acceptance of the ban it will be essential that the State runs a comprehensive state-wide education campaign. It will be critical that the community understands the impacts of plastics on the environment and the positive consequences of behavior change. The campaign should also address concerns the community may have around issues such as alternatives for bin liners.

Should a ban include thick plastic shopping bags?

In drafting this submission, all but one council that provided input advised that they support a ban on thick plastic bags. The council that didn't support the ban was of the view that thicker LDPE bags are tolerable due to their greater prospects for multiple reuses.

Should a ban include plastic bags that break down over time such as biodegradable, degradable or compostable bags?

Degradable bags, as opposed to biodegradable bags, offer questionable benefits compared to other plastic bags. Rapidly degrading into smaller fragments of plastic can lead to them being more readily ingested by marine life. It is appropriate to ban degradable bags alongside HDPE and LDPE plastic bags.

Biodegradable and compostable bags may serve a purpose while limiting the environmental impacts of their disposal. These bags should continue to be available provided they meet the Australian Standard.

Some bin liners currently available for purchase market themselves with labels such as biodegradable, compostable or environmentally friendly. What these terms actually mean is not well understood by consumers. The Victorian Government should work together with the Commonwealth, other state and territory governments, Standards Australia, and the Australian Competition and Consumer Commission to ensure that the marketing and labelling which uses these claims is transparent, and that consumers understand what they are buying. This will help consumers who wish to reduce their environmental impact to do so.

It is important to ensure that any ban is accompanied by education and awareness campaigns. In particular, an awareness campaign should take the opportunity to address the lack of clarity around compostable bags. Many consumers may believe that compostable bags can be composted in their home systems when this is not the case for all bags.

If lightweight plastic bags were banned, we will need to consider exemptions for some purposes, like medical or security activities. Are there any types of businesses, organisations or activities that you think should be exempt from a plastic bag ban?

The MAV recognises that there are some uses for which there is currently no appropriate substitute for plastic bags, among them medical, sanitary, security and food safety uses. Every effort should still be taken to ensure that in cases where a plastic bag is required the most appropriate type is used. There are considerable gains to be made in continuing to improve assessments of environmental impact in procurement policies that already exist in many councils and state government bodies. The Victorian Government is in a strong position to advocate that these same principles be promoted in private industry, both with companies they have a direct relationship with as well as industry at large.

While an exemption to a ban on plastic bags for some uses may be appropriate in the short term, the firm goal should be to promote the development of alternative products, and require that industry transition to them.

If lightweight plastic shopping bags were banned, what alternative bags would you prefer to use?

The discussion paper includes an analysis of the environmental impacts of different types of shopping bags completed by Hyder Consulting. The analysis highlights that bag types often considered to be preferable to single-use plastic bags pose their own environmental challenges. "Green bags" may represent an attractive alternative to HDPE plastic bags, but only if they are accompanied by behaviour change which leads to them being reused a significant number of times. This message must be communicated clearly to the community to ensure that a ban is not counter-productive.

Organic based bags made from materials such as hemp or cotton, as well as bags made from repurposed fabrics such as Boomerang Bags should be promoted.

Whatever alternatives are used, it is vital that the State communicate the reasons for this to the community. This will allow consumers and retailers to make more informed decisions, and promote reuse of bags.

What other options should the government consider to reduce plastic packaging in Victoria?

The most efficient and effective approach to reduce plastic packaging would be via a product stewardship approach, requiring manufacturers, importers and retailers to cover the cost of

plastic waste management. This would provide an incentive to those furthest upstream to consider end of life (disposal) of a product at the design stage.

Consideration should also be given to incorporation of plastic waste reduction principles into procurement policies, and a ban on plastic packaging for perishable fruits and vegetables.

What else should the Victorian Government do to reduce the impacts of litter at a local level and across our state?

There are a range of actions the State can take to reduce the impacts of litter at a local level and across Victoria, including:

- increasing the penalties for litter related offences
- improving support for the enforcement of current policies and penalties
- increasing the ability for individuals to report littering
- introduction of a state-wide ban on single use plastic straws and, in the interim, education of the community and hospitality industries regarding the environmental impacts of plastic straws
- investigate ways to reduce the impact of balloons, including a potential ban on release of balloons in public spaces
- providing support to groups seeking to reduce use of single-use items such as Responsible Cafes, The Last Straw, Boomerang Bags etc.

Reports that in South Australia littering rates returned to pre-ban levels and that the Northern Territory recorded an increase in litter after instituting a ban are concerning. Enforcement regimes are a primary contributor to observed rates of littering, and councils are keen to work together with the Victorian Government to ensure that any actions taken also result in reduced levels of litter.

While plastic bags make up a small amount of Victoria's litter, we agree with the discussion paper that they pose considerable problems due to their mobility, potential for harm, and long life. Beyond the environmental impact they have, including a serious threat to marine life, plastic bags and other plastic litter also impacts the cultural, recreational and tourism value of many parts of Victoria's natural and built environment. We do note that plastic bag litter generally comes from uses such as takeaway food, whereas plastic bags provided at supermarkets will generally get to the consumer's home and be re-used, eventually going to landfill. However, plastic bags sent to landfill often become windblown litter at landfill sites. They are difficult to recapture even with litter controls in place, and can spread offsite.

Along highways, much of the litter consists of fast food packaging. Much of this packaging is paper based and easily recyclable, and we should consider how to divert this into recycling rather than litter. Elements of the packaging however are plastic, primarily plastic bags used by some franchises as well as plastic straws.

There is strong justification to introducing a ban on plastic straws alongside other initiatives, as these present many of the same challenges as plastic bags particularly as a threat to marine

life. Plastic straws could also be relatively easily replaced by paper straws. This would have the dual effect of making them more easily recyclable, as well as reducing their lifespan and impact on marine life if they do end up as litter.

Other areas worthy of further attention are ways to reduce the prevalence of single use coffee cups, including by supporting initiatives such as Responsible Cafes, as well as the impacts of balloons. A number of councils have raised balloons as causing many of the same problems as plastic bags.

How can Victorians be encouraged to further reduce the impacts of litter in their communities?

Media coverage of waste issues, such as the ABC's War on Waste series, has the potential to be very powerful because it provides tangible examples of how individual and commercial behaviour impacts the environment. The public response to recent media coverage has clearly demonstrated that the Victorian public does not have a good understanding of waste issues but is interested in learning and open to changing their behavior.

The Victorian Government's waste education efforts have for the last while largely been focused on development of strategies and provision of grants to support local education efforts. We consider it critical that the State increases its investment in state-wide State-led education campaigns, building on the momentum of recent media coverage.

Beyond litter education, we need community education about waste generation more broadly and how our current "throw away" culture is unsustainable. The latest Victorian Recycling Industry Annual Report indicates that while over the last 10 years the percentage of waste diverted to recycling has grown, we have not been able to reduce per capita waste generated and have seen an increase in gross waste generated. Mass education and behavior change is needed.

What other plastic pollution issues should government, business and communities work together to address?

Councils are concerned about a range of plastic waste issues and call on the State to:

- ban the sale of products containing microbeads
- address filtration of microplastics in wastewater
- support investigation of biological processes for converting polyethylene into more easily dealt with material
- work with councils and industry to develop and improve uptake of recycling programs for silage wrap
- support targeted litter prevention action in litter hotspots such as schools and construction sites

A notable gap in the discussion paper is public place recycling of plastics. Ensuring that infrastructure is used correctly is vital to improving the efficiency of recycling processes, and this is a particular issue in regional areas.

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

Pollution should be addressed as far upstream as is practicable. Reduction in production and consumption is preferable to an increase in recycling or diversion from litter. This principle applies both to legislative or regulatory action, as well as awareness and voluntary reduction campaigns.

A vital part of any strategy must be a comprehensive education campaign run by the State. Councils do not have the resources available to the State to develop a campaign, and material provided should be consistent and developed and delivered by a single source.

The education campaign should include information for the community, retailers, and councils about:

- the rationale for the ban
- preferred alternatives to items being banned
- exclusions that may apply to a ban
- penalties for non-compliance; and
- in regards to a plastic bag ban specifically, what alternatives are available to households as bin liner alternatives

There must also be a clear enforcement strategy in place from the State to ensure compliance with a ban.

Recommendations

The MAV recommends that the Victorian Government:

- i. Recognise that the most effective and efficient place to address issues of waste is as far upstream as possible and that levels of consumption need to be addressed as part of waste strategies
- ii. Ban HDPE and LDPE plastic bags, exempting some situations where those bags are currently required for health and safety reasons
- iii. Seek to promote the development and uptake of alternatives to HDPE and LDPE bags for uses which are exempted from an initial ban
- iv. Ban single-use plastic straws
- v. Ban products containing microbeads

- vi. Develop and deliver a statewide education campaign to ensure that the community, including local government and industry, understands the reasons for and consequences of the bans, as well as improving awareness of the waste issue in general
- vii. Improve the resourcing of litter enforcement, with particular mind to hotspots such as construction sites and schools
- viii. Invest in and support the development of technologies and measures to deal with emerging problems such as microplastics in waste water.
- ix. Utilise the Municipal Industrial Landfill Levy and the Sustainability Fund to fund initiatives that address waste and unsustainable consumption in partnership with local government