25/1/18

Waste & Resource Recovery Team

Department of Environment, Land, Water and Planning

PO Box 500 Melbourne, VIC, 8002

Re: Port Phillip EcoCentre submission to plastic bag ban consultation

Dear Waste and Resource Recovery Team,

I write to commend the state government initiative to conduct wide-ranging stakeholder consultations in relation to the proposed ban on plastic bags in Victoria. Port Phillip EcoCentre is a not-for-profit organisation with a strong focus on empowering local communities to engage in environmental stewardship where they live. We are conscious of the fact that three quarters of Victorians live in catchments around Port Phillip Bay; and that litter dropped in these catchments can ultimately make its way via the stormwater system to the Bay. Consequently, this topic has been a major focus of our educational programs, citizen science, and cross-sector project partnerships over many years.

We believe it is inevitable that Victoria will adopt a ban on single-use lightweight plastic bags as in most Australian states / territories and numerous countries overseas.

Whilst acknowledging that lightweight plastic shopping bags contribute to the plastic litter stream and should be banned ASAP, our observations are that there are numerous items that are equally problematic. There is a pressing need to adopt strategies to address the issue of plastic pollution in general. We therefore propose that, in addition to the plastic bag ban, the Victorian Government take steps immediately to establish an independent Product Stewardship Council to conduct a life-cycle analysis of all plastic consumer products proposed to be marketed in Victoria.

Considering the projected 100% increase of consumer plastics over the next 20 years, it is imperative that stringent controls be adopted to manage the availability and disposal of plastic products in general, as opposed to ad hoc attention to individual product types. The primary role of this Council would be to establish product stewardship goals and guidelines and to assess the necessity, reusability, recyclability of any given product against these goals.

Plastic products become microplastic pollution. Our research on microplastic pollution in the Yarra and Maribyrnong Rivers has found the annual combined load of litter items in excess of 650 million items. Due to prevailing winds and tidal currents, Port Phillip Bay effectively acts a ‘sink’ for most of these items once they reach the Bay. We note that there has been little if any research to quantify micro- and nano-plastic ingestion by fish in the Bay and the implications for human health. In view of the current policy to significantly increase the number of people fishing in the bay this absence of research warrants urgent attention.

We also note that the ability to transfer waste for processing overseas is drawing to a close, particularly with the recent policy shift in China.

In closing, for your consideration we list the following extracts from 'European Strategy for Plastics in a Circular Economy' (2018), highlighting robustly researched European Union (EU) approaches and 2030 vision:

- Moving decisively towards a more prosperous and sustainable plastics economy could deliver considerable benefits.
- Plastics and products containing plastics are designed to allow for greater durability, reuse and high-quality recycling. By 2030, all plastics packaging placed on the EU market is either reusable or can be recycled in a cost-effective manner.
- EU plastics recycling capacity is significantly extended and modernised. By 2030, sorting and recycling capacity has increased fourfold since 2015, leading to the creation of 200 000 new jobs, spread all across Europe.
- Thanks to improved separate collection and investment in innovation, skills and capacity upscaling, export of poorly sorted plastics waste has been phased out.
- Substances hampering recycling processes have been replaced or phased out.
- More plastic recycling helps reduce Europe's dependence on imported fossil fuel and cut CO2 emissions, in line with commitments under the Paris Agreement.
- Plastic waste generation is decoupled from growth. Citizens are aware of the need to avoid waste, and make choices accordingly. Consumers, as key players, are incentivised, made aware of key benefits and thus enabled to contribute actively to the transition.
- The leakage of plastics into the environment decreases drastically. Effective waste collection systems, combined with a drop in waste generation and with increased consumer awareness, avoid litter and ensure that waste is handled appropriately. Marine litter from sea-based sources such as ships, fishing and aquaculture are significantly reduced. Cleaner beaches and seas foster activities such as tourism and fisheries, and preserve fragile ecosystems.
- Higher levels of plastic recycling, comparable with those of other materials, will only be achieved by improving the way plastics and plastics articles are produced and designed. It will require increased cooperation across the value chain: from industry, plastics manufacturers and converters to public and private waste management companies. Specifically, key players should work together to:

  – improve design and support innovation to make plastics and plastic products easier to recycle;
  – expand and improve the separate collection of plastic waste, to ensure quality inputs to the recycling industry;
  – expand and modernise the EU's sorting and recycling capacity;
  – create viable markets for recycled and renewable plastics.

We believe these measures would apply equally in the Victorian context.

Yours sincerely,

April Seymore

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Executive Officer
Port Phillip EcoCentre