



Committee Secretary
Natural Resources, Agricultural Industry Development and Environment Committee
Parliament House
George Street
Brisbane Qld 4000

29 July 2020

Email: NRAIDEC@parliament.qld.gov.au

Re: Submission Waste Reduction and Recycling (Plastic Items) Amendment Bill 2020

Dear Secretary,

The Boomerang Alliance, representing 51 other community organisations, would like to thank you for the opportunity to provide our perspectives on the above bill.

In the Boomerang Alliance submission to the Regulatory Impact Statement (QLD) consultation (April 2020) we outlined 7 requirements we sought in the legislation. These were:

1. Enabling legislation to ban the supply of specific plastics products, starting with straws (taking into account the disability needs of people), stirrers, plates and cutlery and following further analysis, regulation to include coffee cups, other plastics cups and heavyweight plastic shopping bags.
2. A definition of plastics that allows exemptions only for products that meet the Australian Compost Standards (AS 5810/AS 4736).
3. Consideration of whether (consistent with South Australia) the first tranche of products listed could simply be banned from sale, irrespective of their compostability.
4. The inclusion of expanded polystyrene cups and containers (e.g. clam shells) in the first tranche.
5. The inclusion of a stated ban on all oxo-degradable products, with no exemptions.
6. The start date for the first tranche of products to be banned being July 2021 (or earlier), with no additional transition period.
7. The start date for the second tranche within 12 months of the enabling legislation.

Our review of the current proposed legislation confirms that most of these requirements have been met. However, there are a couple of requirements we believe could be included that are not. These would strengthen and make the legislation more effective.

1. Enabling Legislation

The enabling legislation means that the most littered takeaway packaging found in Queensland is captured by regulation. The first tranche includes straws, stirrers, cutlery, plates and bowls. The second list scheduled for a phase-out includes coffee cups, other plastic cups and heavyweight plastics bags.

To strengthen the bill we recommend that the legislation also includes a ban on expanded polystyrene (EPS) cups and containers in the first tranche (see 3 below); and a requirement to introduce the second list of products, for phase-out by 2022.

We also recommend that a specific list of products be identified for this second phase-out that includes:

- coffee cups AND lids
- other single-use plastic cups AND other problematic packaging used in takeaway (eg plastic wrappers, sushi packaging)
- heavyweight plastic shopping bags (up to 70 microns thickness)

and that consideration be given to the inclusion of:

- condiment sachets and single -use plastic sauce containers
- balloon releases of any number
- the use of helium to inflate balloons
- mylar balloons
- balloon sticks
- barrier bags
- cotton buds
- paper wipes (these also contain plastic elements)

Cigarette Butts

The largest single item of plastic litter is the cigarette butt. It has been estimated that billions of cigarette butts are littered each year. In Queensland the latest Clean Up Australia Report calculated that on an individual count basis that cigarette butt numbers represented nearly 20% of all litter. Butts contain toxins and other chemicals that are harmful in the environment.

As enabling legislation, the bill can include other items in the future. To address the problem of cigarette butts, we recommend that the State, working with other jurisdictions, identify policies that will reduce this litter and add these to the legislation in the future.

2. Exemptions

We support exemptions for those with a disability being able to access plastic utensils they need.

Whilst the government could have simply banned plastic straws, stirrers, cutlery (as is the case in South Australia), we support exemptions for plastic food ware that meets the Australian Compost standards (AS 4736/AS 5810). These standards mean that discarded plastics can be composted in either commercial or home compost systems. They are standards accepted by the compost industry. Setting this standard in Queensland will encourage other jurisdictions to follow and lead to the establishment of a national standard for compostable food ware.

Note: There are collection services for compostable food ware already established and these are growing in number. This legislation will encourage the mass uptake of these services.

Biopak offer collection services in many centres around Australia, including Brisbane, Gold Coast and Mackay. Most waste service providers offer compost collections for major and public events in Queensland. All these services also collect discarded food waste that can be composted rather than sent to landfill.

Allowing only exemptions for food ware that meets the Australian compost standards, means that oxo-degradable products will not be permitted. These products, usually marketed as environmentally-friendly (e.g. eco-straws) are not biodegradable or compostable.

We also question the exemption for plastic items contained in ready-made products such as with juice boxes, salads or yoghurt containers. All of these plastic items have available non-plastic alternatives or compostable versions. Producers have had ample time to replace plastics with these alternatives. Allowing these items sends a completely inconsistent message, without any clear reason why these items are exempted.

To strengthen the bill we recommend that plastic items in ready-made products are not exempted

3. Expanded Polystyrene

The government has not included a proposed ban on expanded polystyrene (EPS) cups and containers in the first tranche of products to be banned. We believe these products should be included now, and not later.

EPS cups and containers (plates and bowls are included in the first tranche) are a particular problem both as litter and in waste collection. EPS products have ready alternatives, and many food service providers have long abandoned EPS.

As litter EPS products do not decompose, they break up easily into pieces and are wind-blown and readily pollute the natural environment and waterways. They are regularly mistaken for a food source by wildlife. Discarded EPS is a costly expense for council and community clean-ups.

As waste, EPS products are often discarded into recycling bins causing huge problems at recycling MRFs not designed to process EPS products.

Banning EPS products now is supported by a wide cross-section of business and community organisations. In a letter sent to the Environment Minister in June 2020, members of the Governments Advisory Committee on this legislation, **strongly recommend that expanded polystyrene (EPS) takeaway cups and containers (including clam shells) be included in the first tranche of the scheduled ban.**

That letter was supported by Local Government Association (Qld), National Retail Association, Australian Food and Groceries Council, Boomerang Alliance ,WWF-Australia QLD Disability Advisory Council and the Master Grocers Association

To strengthen the bill we recommend that EPS cups and containers be added to the first tranche of products to be banned in July 2021

4. Date for the introduction of a Ban

We support the introduction of a ban in July 2021. This schedule provides sufficient time for packaging and service providers to have switched supply options. These products that include plastic straws, stirrers, cutlery plates and bowls have been on the public and industry agenda for several years, given their associated litter and waste issues.

The proposed bans were announced in November 2019 meaning that suppliers and their customers will have had over 18 months to prepare for the changes. In our experience, through the Plastic free Places program, most cafes want to make the change to cut down on plastic waste as soon as possible, and many tell us their reasons include their customers overwhelmingly wanting them to do so.

Additional Note

The Plastic Free Places program run by the Boomerang Alliance in three locations in Queensland-Noosa (run by Tourism Noosa since January 2020) and PF Cairns and PF Townsville (both started in March 2020) has demonstrated the willingness of the hospitality sector to switch away from single use plastic takeaway products. It is a proven transitional program for the implementation of single use plastic bans. In the two years to December 2019, over 200 cafes in Noosa joined eliminating nearly 4 million plastic items. This included 1.4 million straws, 355,000 pieces of cutlery and 70,000 plates and bowls. The Noosa Triathlon removed over 190,000 plastic cups.

Despite a shut-down by the hospitality sector as a result of coronavirus in March to June this year, the Plastic Free Places program in both Cairns and Townsville has continued to engage with cafes. Since re-opening, over 30 cafes have joined the program in those two locations alone.

Nationally, and in addition to QLD, the PFP program is active in Byron Bay (NSW), Elsternwick (Victoria), Mornington (Victoria), Adelaide (South Australia), Bassendean and Victoria Park (Western Australia). Over 400 cafes have joined eliminating over 6 million single use plastic items to date.



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