



Public Health Association
AUSTRALIA

Public Health Association of Australia submission on phasing out single-use plastics (ACT)

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Preamble

The Public Health Association of Australia

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public's health in Australia.

The PHAA works to ensure that the public's health is improved through sustained and determined efforts of the Board, the National Office, the State and Territory Branches, the Special Interest Groups and members.

The efforts of the PHAA are enhanced by our vision for a healthy Australia and by engaging with like-minded stakeholders in order to build coalitions of interest that influence public opinion, the media, political parties and governments.

Health is a human right, a vital resource for everyday life, and key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people's health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

All members of the Association are committed to better health outcomes based on these principles.

Vision for a healthy population

A healthy region, a healthy nation, healthy people: living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health for all.

The reduction of social and health inequities should be an over-arching goal of national policy and recognised as a key measure of our progress as a society. All public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.

Mission for the Public Health Association of Australia

As the leading national peak body for public health representation and advocacy, to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.



Introduction

PHAA welcomes the opportunity to provide input to phasing out single-use plastics in the Australian Capital Territory. Since the mass production of plastics took off in the early 20th Century, the lure of cheap, light weight, water-resistant, disposable products and packaging has been seemingly irresistible. Even as concern about the persistence of plastic waste grew, our reliance upon it has continued to grow. As we approach the moment of there being more plastic in the ocean than fish,¹ the urgency of moving from 'what shall we do with all this plastic rubbish?' to 'how much of this plastic do we actually need to produce in the first place?' is all too clear.

PHAA supports the Australian Capital Territory Government building on their 2011 plastic shopping bag ban with action on the June 2018 recommendation of the Senate Environment and Communications Committee to phase out petroleum-based single-use plastics by 2023,² and the Australian Packaging Covenant Board's 2025 Target of phasing out 'problematic and unnecessary' single-use plastic packaging, as agreed in September 2018.³ We commend the ACT Government on taking a broad approach through the consideration of single-use plastics generally.

PHAA Response to the discussion paper

Single-use plastic products

Do you agree with the consumer single-use plastic items listed on p21 being considered as part of this paper? If so, which items do you think are the most important to address (e.g. plastic bags, straws, cutlery, disposable coffee cups, takeaway containers)?

As noted in the discussion paper, not all single-use plastic products are the same. Some are currently justifiable and necessary – for example in medical use, but others are not necessary – for example packaging fresh fruit and vegetables, and/or have more sustainable alternatives available – for example plastic straws and cutlery.⁴ As a society, we are still in the relatively early stages of effectively tackling the problem of plastics in our environments. This has the advantage that there are still 'low-hanging fruit' available. PHAA recommends that need and the availability of sustainable alternatives be the principles underpinning decisions on which products to focus on at this stage. Successes in these categories will, over time, ease the path for reducing products for which there is a genuine need identified, but no sustainable alternative currently available.

The consequences of banning particular single-use items, including unintended consequences need to be considered. For example, increases in the production of thicker, heavy plastic bags as a consequence of policies to de-incentivise single-use plastic bags. Policies must be designed to specifically encourage non-plastic alternatives.

In some instances, particular products may increase the use of certain single-use plastics. For example, the rise in popularity of Taiwanese bubble tea which includes plastic straws for novelty value. However, alternatives have been embraced in Taiwan as it prepares to ban plastic straws.⁵

The experiences of other jurisdictions may provide a helpful guide. The United Nations Environment Programme produced a report in 2018 on single use plastics which includes a number of case studies from countries around the world.⁶

The ACT Government may wish to consider the inclusion of wet-wipes in the initial phase.

What regulatory or other approaches do you support to address consumer single-use plastic in the ACT?

With the strong evidence-base for the health and environmental impacts of single-use plastics, strong changes are required. The rise in reusable coffee cups by consumers, cafes and manufacturers demonstrates the will within the community for action. However, the relatively small dent this has made in the number of disposable coffee cups produced and used demonstrates that community goodwill and voluntary actions are not sufficient. PHAA supports regulatory and legislative approaches to ban single-use plastics over time as being the only effective way to significantly reduce their production. The success of the banning of single-use plastic bags in the ACT highlights the effectiveness of such strong approaches.

Products for which there is no demonstrated need and/or for which there are sustainable alternatives available should be subject to bans within a short timeframe, with reduction targets for other products, in line with the approach taken by the European Union. Ambitious targets will support the innovation required to increase the number of products able to be subject to bans.

Legislation and regulation must require sustainable alternatives to meet a strict definition of 'sustainable', to ensure that products labelled as 'biodegradable' or 'compostable' actually will break down under likely disposal options and within timeframes which are actually sustainable. Health and environmental benefits will not be demonstrated if the conditions required for a product to fulfil its potential as biodegradable or compostable are rarely ever met, or if it still takes years for the process to occur.

When do you think action is needed, and why?

The discussion paper outlines environmental impacts of single-use plastics. The PHAA would like add to that evidence base by providing further detail on the health impacts. The need to focus on reducing production of plastics in the first place has been highlighted in a new report which demonstrates that there are significant health impacts throughout the (long) lifecycle of plastics. This report, from a consortium of international environmental groups led by the Center for International Environmental Law (CIEL), found that there is an 'urgent need to adopt a precautionary approach to protect human health from the plastic pollution crisis'.⁷ The report details significant and distinct risks of health at every stage of the lifecycle of plastic with most people exposed at multiple stages:

- Extraction and transport of fossil fuels for plastic – cancer, neurotoxicity, reproductive and developmental toxicity, impairment of the immune system, and documented impacts on skin, eyes, the respiratory, nervous and gastrointestinal systems, liver and brain.
- Refining and production of plastic resins and additives – impairment of the nervous system, reproductive and developmental problems, cancer, leukemia and genetic impacts like low birth weight
- Consumer products and packaging – ingestion and inhalation of microplastic particles and toxic substances with carcinogenic, developmental or endocrine disrupting impacts
- Toxic releases from Plastic Waste Management – releases toxic metals such as lead and mercury and acid gases into the air, soil and water.
- Cascading exposure as plastic degrades – leaching toxic additives and accumulating in food chains through soils and water.

The World Health Organization confirms that 92% of the global population live in areas where ambient air pollution levels exceed WHO limits, with children being particularly vulnerable to the effects.⁸

The CIEL report recommends taking a lifecycle approach which puts human rights and human health at the centre of solutions, and concludes that "urgent, global action is needed to reduce the production and

consumption of plastic and associated toxic chemicals”.⁷ South Australia joining other jurisdictions worldwide who are planning or implementing bans on single-use plastics is an important step in this action.^{6, 9-11}

With the environmental, social, economic and health impacts of single-use plastic products, the need for immediate action is clear. Crucially, many alternatives to single-use plastic products are available now, so immediate action is possible. Therefore, PHAA recommends the ACT join the many other jurisdictions around the world taking action on phasing out single-use plastic products, without delay.

Conclusion

PHAA supports the broad directions consultation on the impacts of single-use plastic products. We are keen to ensure effective change in the short term, in line with this submission. We are particularly keen that the following points are highlighted:

- Social, environmental and health evidence confirms that urgent action is required to reduce the production of plastic
- Health and environmental outcomes must be prioritised over commercial interests
- Single-use plastic products with no demonstrated need, and/or with sustainable alternatives available should be banned, with ambitious targets implemented for other single-use plastic products to encourage innovation.

The PHAA appreciates the opportunity to make this submission and the opportunity to contribute to reducing plastic in the ACT.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission.



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