

A response to the ACT Government discussion paper on 'Phasing out single-use plastics'.

From the WasteLess Group, SEE-Change

SEE-Change 'WasteLess' group – Who are we?

SEE-Change is a Canberra grass-roots sustainability organisation formed in 2008. It is unique in that it delivers sustainability information, activities and programs through its volunteer-led groups within the Canberra community.

The SEE in SEE-Change stands for Society, Economy, and Environment. From its beginnings, the organisation's goal was to address changes across these three spheres in order to create a fair and sustainable society with a reduced environmental impact.

By way of example, one activity was SEE-Change's demonstration of the making of reusable shopping bags for small items (like fruit & vegetables) from second-hand curtain fabric sourced from Paper and the Works, a social enterprise at the Green Shed. Also, SEE-Change helped people attending the Downer shops party in November 2018 and the Living Green Festival to have a go with a sewing machine making these reusable bags which they then took home.

The WasteLess group (we) was formed in 2018 as a sub-group of SEE-Change, with the principal goal of encouraging Canberrans to reduce waste. The group consists of about 20 members, who mostly are also members of SEE-Change. We have run stalls in public places in conjunction with Plastic Free July, National Recycling Week and other community events. We have also recently conducted a letterbox campaign about food waste. Our priorities in 2019 are on reducing food and plastic waste.

The group deliberately decided to name itself 'wasteless' rather than 'nowaste' as no waste can be seen as an impossible dream. However, we believe that we can all significantly reduce the waste we generate with only a small effort, backed by government policy and initiatives.

The WasteLess group has conducted several stalls where we asked people to identify, from a range of waste items, which ones can be recycled. The majority of people find identifying which plastic items can be recycled very confusing. The rules about which plastic items can be recycled seem to change all the time leading to most people have great trouble knowing what the rules are. Whilst recycling is better than putting the item into landfill, recycling costs money and requires significant energy to convert plastics into other items that can be used. Page 9 of the discussion paper highlights that only 12 per cent of plastic waste in Australia in 2016-17 was recycled. Recent news items about the crises in the Australian

recycling industry with some councils announcing that recycling is being sent straight to landfill, only confuses people even more about the value of recycling. The high contamination rates in recycling bins in the ACT also supports this observation. For all these reasons, the WasteLess group supports the government's position to introduce policies to reduce and quickly ban the use of single-use plastics, rather than relying on recycling. This is reflected in the recommendations in the following sections of this paper.

The future of single-use plastics in the ACT

The WasteLess group thanks the ACT Government for the opportunity to provide comments and ideas on this discussion paper and we provide the following responses to the questions posed in the paper.

Question 1 Do you agree with the consumer single-use plastic items listed on page 21 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)?

We agree that the items listed in column 1 should be considered as part of this paper, namely:

- Plastic straws and stirrers
- Plastic cutlery
- Disposable plastic plates and cups
- Disposable plastic-lined coffee cups and lids
- Polystyrene (foam) plastic food containers and beverage cups
- Light-weight fruit and vegetable bags.

However, we think that the following should also be added to the list for consideration:

- Plastic beverage containers
- Plastic takeaway food containers
- Reusable plastic bags above 35 microns in thickness, including 'green bags', 'biodegradable' and 'compostable' bags.

All of these should be included in any program to phase-out single use plastics. We suggest that as all the items above relate to food and beverage consumption and day-to-day shopping, they be targeted equally. We believe that prioritising some items over others is likely to weaken initiatives to reduce and phase out single-use plastic products in the ACT, and weaken the education process which will be required.

We would have preferred that other plastic packaging also be considered because it is very hard to avoid such packaging. However, we recognise that reducing plastic packaging will probably require national action and it is hard to implement in one jurisdiction only. We encourage the ACT Government to continue to work with other states and territories and companies to reduce plastic packaging.

We note that the ACT Government has already introduced education campaigns to build awareness of plastic grocery bags, straws (the 'Straws Suck' campaign), has an internal Soft

Plastics Working Group for recycled glass and soft plastics (discussion paper, page 23), and supports the Responsible Cafés movement. We suggest that greater strength and coherence would be given to these and future initiatives by targeting all the products listed above in a single campaign in the same timeframe for phasing out.

Question 2 What regulatory or other approaches do you support to address consumer single-use plastic in the ACT? When do you think action is needed, and why?

The first approach taken by the ACT Government should be to encourage all Canberrans to REDUCE their use of the single-use plastics listed on page two, for example, by encouraging use of re-usable coffee cups and water bottles. The ACT Government can do this through education and continuing support of campaigns such as Plastic Free July and Responsible Cafés.

The education program should not be just aimed at consumers. It should also be aimed at businesses which are not providing compostable or recyclable containers or participating in the Responsible Cafés movement, to encourage them to support the reduction of single-use plastics by, for example, providing a discount for re-usable coffee cups, providing re-usable coffee cups with a deposit, and allowing and supporting 'bring your own'. Some other alternatives to single-use plastics are discussed in our response to question 5.

Strengthening existing ACTSmart programs such as the Actsmart Business Energy and Water Program and the ACTsmart Schools program to provide education in ACT corporations, offices and schools, would capitalise on work which the government is already doing in this sphere. We believe that lessons learned by staff and students in their place of employment and learning, provide peer-group pressure for change and are transferable to home waste-disposal practices.

We recommend that all single-use plastics which cannot be recycled in the home recycling bin or placed in the home compost bin, be banned by 31 December 2021. The aim of this approach is to simplify the recycling message. Currently, recycling plastics is confusing as we have observed in stalls we have run, whereby people are unable to correctly identify which plastics can be placed in the recycling bin. The nett result of such a ban would be that the only items in circulation would be those that can be placed in the home recycling bin.

We note that some jurisdictions in Australia and overseas have, or are in the process of banning compostable plastic bags, as they are compostable only in commercial facilities. Using the above criteria, these would also be banned in the ACT, as they cannot be recycled in the home recycling bin or in a home compost bin.

The WasteLess group recommends that single-use plastic water bottles should be included in the ban by 31 December 2021, even though these can be recycled. We have given special prominence to single-use plastic water bottles because they form such a significant component of plastic waste. Further, water from the tap in the ACT is of high quality. Filters can be purchased for those people seeking a higher quality. There is no need for water to be sold in plastic bottles. It was 10 years ago that Bundanoon implemented a ban on single use plastic water bottles, replaced by water fountains and shops selling reusable water bottles.

We commend the ACT Government for installing water fountains in the ACT and urge that the government increase their number and publicise their locations.

We suggest that consideration should also be given to expanding the items covered by the container deposit scheme. Given that the scheme results in increased rates of recycling, it is important to have as many plastic containers included in the scheme as possible. For example, plastic milk bottles could be included.

At the Independent Competition and Regulatory Commission public forum on the Container Deposit Scheme held on 20 March 2019, it was suggested that some food retailers are not aware of the scheme. It was suggested that better communication needs to be undertaken by the government to reduce the amount of recyclables going to landfill from these businesses, and the WasteLess group supports this action.

We recommend that consideration be given to providing grants to help the transition to an ACT without single-use plastics. For example, a community organisation that wants to offer re-usable coffee cups instead of single-use coffee cups at events might be provided with a grant to cover the initial cost of purchasing a set of re-usable cups.

We recommend establishment of an ACT NoWaste telephone/text helpline, separate to Canberra Access Connect Centre (phone 132281), for quick responses to consumer queries and concerns both in the phasing-in period and continuing following the full ban.

Whilst we would prefer an earlier date for commencement of a full ban on single-use plastics in the ACT, following a phase-in period, we recognise that the success of this program depends on high quality communication and education in the lead-up period. We suggest that two and half years should be sufficient time to allow businesses to adjust to implementing alternatives and phase out current stock of containers.

Question 3 If you are an ACT based manufacturer, importer or retailer of consumer single-use plastic products, what cost and other impacts do you think need to be considered as part of this discussion?

As we are not a manufacturer, importer or retailer, the WasteLess group is not in a position to respond to this question at this time.

Question 4 If you are a local business that sells, offers or provides consumer single-use plastic in the ACT, what do you think needs to be considered as part of this discussion?

While the WasteLess group is not in a position to answer this question from the perspective of a business, we do see that getting businesses on side is essential to achieving a reduction in single-use plastics. We are encouraged by businesses that have already taken steps to reduce single-use plastics.

We are concerned that some businesses which are attempting to introduce alternatives to single-use plastics are being misled by suppliers of some food containers. For example, a takeaway cold drink container with lid which is being used by a local café is branded as

NatureWorks Bio Cup and labelled with the words 'Made from plants not oil', is in reality a product which is #7 PLA and is non-compostable and non-recyclable in the ACT.

In keeping with the stated purpose of this discussion paper (page 6), we believe that an important consideration of potential impacts on manufacturers, importers and businesses that supply and use single-use plastics, is guidance provided by government, particularly in sourcing truly recyclable or compostable packaging products.

We support the position of the discussion paper that if a closed economy can be achieved by working with industry and business through innovation and incentives (such as is provided by the Container Deposit Scheme), both industry and the ACT community will be rewarded.

Question 5 Have you taken steps to reduce your use of single-use plastic? If so, what have you done?

Individual members of the group have taken steps themselves to reduce their use of single-use plastics. All have participated in Plastic Free July and recognise how difficult it is to remove all single-use plastics from daily use. However, we believe that it is also possible to significantly reduce one's use of single-use plastics through a number of simple steps, planning and forethought.

We have also encouraged Canberrans to implement the same simple steps including:

- Using reusable shopping bags (There is no need to buy the bags in the shops)
- Using reusable produce bags when shopping for fruit and vegetables
- Swapping to a reusable coffee cup
- Using a reusable water bottle
- Saying 'no' to a plastic straw
- Carrying our own stainless steel or glass straw
- Using reusable beeswax wraps, food wraps or sandwich pouches
- Buying from bulk food shops pack food items straight into reusable jars or containers
- Collecting take-aways in our own containers
- Carrying a knife, fork and spoon set instead of using the plastic cutlery provided
- Using soda fountains instead of purchasing fizzy drinks in plastic containers.

All of these REDUCE the amount of single-use plastics.

Question 6 What alternatives to single-use plastics have you used and are they practical?

Members of the WasteLess group use alternatives to single-use plastics, as described in response to question 5. Therefore we strongly advocate that the first and most important alternative is to REDUCE the use of single-use plastics. This can be achieved by REFUSING a single-use plastic item e.g. a plastic straw. It can also be achieved by using REUSABLE items e.g. coffee cups, water bottles, produce bags, stainless steel straws. Emphasising alternatives to single-use plastics must be first and foremost in any education campaign associated with introducing a ban on single-use plastic items.

As a last resort, for many of the items listed in response to question 1, the alternative is an item that can be RECYCLED. For example, there are several alternatives to polystyrene food containers where customers do not provide their own. Paper bags are a much better alternative for bread than plastic bags.

Question 7 What members of our community may be impacted by phasing out single-use plastics and how? What are the solutions?

We suggest that all members of the community will be impacted, and that time, an effective education campaign and an accessible telephone/text helpline will be essential to establishing new behaviours among consumers.

We are aware of the possible impact on people with a disability with banning plastic straws. If it is found necessary to retain plastic straws for use by some people in our community, they should not be on public display, and should be made available only on request. We believe that the current stock levels of such straws would meet this demand for many years into the future.

Question 8 What else do you think needs to be considered as part of this discussion?

As stated previously, we suggest that a thorough education campaign before significant changes are made, and provision of a responsive telephone/text helpline beforehand and for some time after introduction of changes, are essential to the likelihood of winning the minds and support of the community. Without education, implementation of a ban on single-use plastics is likely to meet with significant resistance.

We encourage the ACT Government to continue working with 'state and national counterparts to drive an ambitious, harmonised national approach' (discussion paper, page 22).

Furthermore, we suggest that incentives to industry and business to phase out their sale of products in single-use containers would build on the momentum of Canberrans who support ACT policies to reduce our plastic consumption.

Conclusion

The SEE-Change WasteLess group encourages the ACT Government to implement a ban on single-use plastics by 31 December 2021, and to act on the recommendations in this response. We are highly supportive and very willing to participate in any community reference group to assist with this program, and are committed to working with the ACT Government to achieve successful implementation of an ACT without single-use plastics. We commend the ACT Government's efforts in addressing the usage of single-use plastics and look forward to seeing the outcomes of this consultation process.