



Western Australia Branch

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Plastic Bag Ban
Department of Water and Environmental Regulation
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9 March 2018

Dear Mr Rowe

RE: Implementing a light weight single-use plastic bag ban in Western Australia

The Waste Management Association of Australia (WMAA) appreciates the opportunity to provide comment on the proposed light weight single-use plastic bag ban for Western Australia.

WMAA is the national peak body for the waste and resource recovery industry, with over 1,800 members based in a broad range of business organisations, government, universities and community groups. WMAA's members are involved in a range of important waste management and resource recovery activities within the Western Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery and responsible management of residual materials, and community engagement and education. Comment has been provided by the WMAA Western Australian Branch Committee, representing waste and recovery operators, suppliers and consultants.

The Association supports the ban on light weight, single-use plastic bags. The Association acknowledges the significant environmental impact that plastic and single use items have on the environment and the need to put in place approaches to address these issues, particularly as part of a broader waste avoidance strategy.

For the resource recovery industry in particular, single use plastic bags are problematic due to limited ability to recover (unless through a dedicated collection stream), limited end markets for recycled product, practically plastic bags frequently become tangled in sorting equipment and generally lead to increased contamination of the paper stream due to the difficulty of recovering these materials through the kerbside recycling systems. The Association is keen to ensure that any alternative bags that consumers use are intended for multiple reuse.

Should biodegradable, degradable and compostable bags be included in the bag ban?

The Association supports the expansion of the ban to include compostable, biodegradable and degradable bags. These types of bags, all potentially have the same impact in the environment and recovered waste streams as the current single use plastic bags. Compostable and biodegradable bags

WMAA is the peak body for the waste and resource recovery industry

do not necessarily break down, except in commercial composting operations, which would therefore require the introduction of such a source separated collection system to support these items. Degradable bags break down into small pieces of plastic. Bags that are compostable or biodegradable are made of different materials to other flexible plastic and therefore represent another potential contaminant in the recycling process.

Can you quantify the costs that will be avoided when the amount of lightweight plastic bags entering the waste stream is reduced and there is less contamination by lightweight plastic bags in recyclables?

There is limited potential that the ban will reduce some costs associated with processing recyclable materials through material recovery facilities. In particular, it may reduce machine stoppages due to plastic bags becoming wrapped around equipment. The main benefit for MRF operators is the potential to reduce contamination levels within the paper stream. Any improvement will only be realised if retailers do not substitute the current single use plastic bags with thicker bags. This is why to realise the waste reduction potential of the ban, it is important for comprehensive retailer and community engagement.

Unintended consequences

The potential unintended consequence of the ban on lightweight single use plastic bags is that retailers will increase the thickness of bags to ensure that a bag can still be given away 'free'. The Department should ensure there is ongoing monitoring of the type of bags being supplied as an alternative and consider increasing micron thickness for plastic bags if it is found there is a widespread shift to thicker bags. Another options could be a charge for any bag provided by a retailer.

Community and retailer education and engagement

In communicating the ban and ensuring its effective implementation a comprehensive community and retailer education and engagement strategy will be required.

Additional suggestions to improve the ban

The Association suggests that to inform consumer's choice of re-usable bag, the Department work with other jurisdictions to develop labelling that identifies the amount of times the bag would need to be used to be carbon neutral. This would make up one of the communication and education actions necessary to ensure the ban achieves effective environmental outcomes and minimises unintended consequence.

Should the Department like to continue the conversation or clarify any of the comments made above, please do not hesitate to contact the undersigned.

Yours sincerely



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Waste Management Association of Australia



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Waste Management Association of Australia

