



POSITION ON PLASTIC BAG PACKAGING

29 February 2016

Plastics represent a threat to the environment and to the maintenance of a healthy food chain, due to their persistence, toxicity and ingestion by wildlife; and some plastic products are also a threat due to their ability to entangle and choke wildlife. This includes current so-called biodegradable/compostable bags.

A Commonwealth/State Government plastics agenda should be about reducing and then eliminating this threat and working internationally with other jurisdictions on complementary and effective global solutions.

In Australia an immediate policy response should be to introduce restrictions on single use plastic packaging and its avoidance, in favour of alternative reusable packaging and practices. Due to the long delays and policy review roadblocks in Commonwealth Government processes – state action is favoured.

In our view the immediate and effective policy response from State jurisdictions on plastic bags and other single use plastic should be:

- To ban all single use HDPE bags up to 70 microns.¹ This ban should apply to all wholesalers, importers and retailers who provide these products to their customers both in shop and online, including all small business.
- The ban should include all identified ‘biodegradable and degradable’ bags up to 70 microns (standards used in current laws for biodegradability/compostability do not prevent microplastic pollution – see below).
- Specific purpose bags less than 70 microns such as barrier bags could be exempted, but only where there is a demonstrated health, food safety or fit-for-purpose reason and where no viable alternative exists. Any such exempted bags should be uncoloured and unbranded to avoid increased ingestion by marine life.²
- Ensure targeting of bait bags and ice cube bags which are usually used outdoors and represent a particular problem in the litter stream.
- The mass release of balloons should be banned.
- Packaging providers and retailers should be encouraged to put forward additional recommendations about other forms of single use plastic packaging that could be replaced or avoided.
- A transition period of 6 months should be established between an announcement and introduction of any bans, to allow for alternative arrangements and a public/retailer education program.
- An effective penalty and resourced compliance regime.
- A levy not be supported due to administrative complexity and the lack of long term impact.

An Intermediate Policy Response (a continuous improvement strategy) should be:

- The establishment of an expert taskforce to review and report back to government within one year on recommended actions to restrict other forms of single use plastic packaging not included in the immediate policy. This review should include the identification of alternative products and practices to single use plastic packaging.

¹Potentially in two phases <35mcs; 36-70mcs.
²2014 study by the University of Tasmania necropsies of 171 Shearwaters found 1,032 pieces of plastic in their gullet – just 0.87% was clear plastic, compared to 62% light coloured plastic, 22% of medium colours and 14% dark colours.

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Role of the Commonwealth

Whilst this policy response lies predominantly with state governments, the Commonwealth can play an important role by:

- Supporting substantial progress on the plastics agenda
- Resourcing a harmonised approach across all state jurisdictions
- Protecting all marine environments from the threat of plastics and litter
- Ensuring importers comply with any packaging restrictions
- Participating in international efforts to reduce and eliminate plastic pollution, particularly through the application of a robust EPR regime

BIODEGRADABILITY?

A key issue is 'biodegradable and compostable' bags and their suitability as alternatives when they occur in the environment as litter.

The standard AS 4736-2006 is found in the ACT, SA, TAS laws. This operates at high temperatures, that do not occur in terrestrial or aquatic or home composting environments. In the environment the bags break into smaller pieces - this means it can still enter the marine environment as a full bag or small pieces and scientists are reporting significant problems.

The standard provides assessment criteria for plastic materials that are to be biodegraded in municipal and industrial aerobic composting facilities. This Australian standard is similar to the widely known European EN 13432 standard, but has an additional requirement of a worm test. In order to comply with the AS 4736-2006, plastic materials need to meet the following requirements:

- minimum of 90% biodegradation of plastic materials within 180 days in compost
- minimum of 90% of plastic materials should disintegrate into less than 2mm pieces in compost within 12 weeks
- no toxic effect of the resulting compost on plants and earthworms.
- hazardous substances such as heavy metals should not be present above the maximum allowed levels
- plastic materials should contain more than 50% organic materials.'

The second current standard is AS 5810 which uses lower temperatures but still allows an additive that causes the bag to break up into smaller pieces.

The AS5810 standard specifies requirements and procedures to determine whether a plastic material is biodegradable in home composting conditions and provides the basis to allow labelling of materials or products made from plastic as 'home compostable', for use in home composting systems.

Home composting systems vary considerably in their design, construction and operation; hence their performance also varies considerably compared to commercial composting facilities. Consequently, this Standard, in comparison to AS 4736, uses lower temperatures in test environments and a longer test duration, to account for such variations in home composting performance.

However as litter they are still a serious environmental pollutant.

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