

Public comment process for the

Draft Threat abatement plan for the impacts of marine debris on vertebrate marine life (2017)

This completed form must be included with your submission. If completing by hand, please ensure your writing is clear and legible.

CONTACT DETAILS	
<p>We need to collect some personal information in case we need to contact you should further information or clarification be required on your submission. Personal information may be disclosed to the Minister, members of the Threatened Species Scientific Committee or to employees of Australian Government agencies assisting the Committee for the purposes outlined above. Contents of your submission may be included in subsequent publications.</p> <p>Please provide at least one contact (telephone number is optional). If you are making a submission for a group or organisation, please provide contact information for one member of your group or organisation.</p>	
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<p>Return the cover sheet and your comments by email or post: Email: marinedebris@environment.gov.au</p> <p>Director Environmental Biosecurity Section Department of the Environment and Energy GPO Box 787 Canberra ACT 2601</p>	

COMMENTS SHEET

If your comments relate to a specific section, objective or action, please record these below.
General comments can be included below the table.

Section/objective/action	Comments
1.02 Limit the amount of single use plastic material lost to the environment in Australia	<p>Implement Single-Use and Biodegradable plastic bag bans and CDS (Container Deposit Schemes) in all States and Territories immediately.</p> <p>Instigate immediate bans on products containing Microbeads.</p> <p>Enforce that all washing machines sold must have filters to capture microfibers that are released through washing.</p> <p>Ban articles to be sold that release microbeads and microfibers.</p> <p>Undertake a national study on the polluting effects of tyre dust.</p>
1.03 Encourage development of a circular economy in Australia	<p>Upcycling of Plastics and re-purposing of plastics that are collected at SQID (Stormwater Quality Improvement Device) points. Ensure that all Councils comply with the installation of SQIDs to capture plastic debris.</p>
1.04 Encourage innovation in recovery and waste treatment technologies	<p>Invest and support companies who provide plastic upcycling and related technologies. Develop Non petroleum plastic products made from Cassava Starch. Turn existing plastic waste into housing etc NEVHOUSE</p>
2.03 Identify locations within Australian waters where major circulation patterns cause aggregations of marine debris	<p>Refer to http://www.boomerangalliance.org.au/the_plan</p> <p>Whilst the Boomerang Alliance plan doesn't pinpoint locations, it provides accumulative data within our waters. Refer to 4.10</p>
3.01 Build understanding related to microplastic pollution	<p>Contact Jen Lavers on Lord Howe Island regarding her research on marine birds and the effects of plastics on sea bird life populations. Refer to http://www.boomerangalliance.org.au/the_plan</p>
4.01 Support beach based clean-up efforts	<p>Refer to www.surfrider.org.au for our beach clean events calendar</p>
5.01 Continued collection of data in long term beach survey.	<p>The Surfrider Foundation Australia are currently unertaking a project called the 'State of Our Surf'.</p>
6.01 Raise the profile of marine debris impacts on listed threatened marine species.	<p>Surfrider Foundation's 'Rise Above Plastics' campaign is about educating the public on the ocean in general.</p>

General comments:

The Surfrider Foundation Australia requests to be involved in the consultation on this important issue. We actively campaign against disposable, single-use and (so-called) 'biodegradable' plastics, microbeads and other plastics that break up into micro-plastics and make their way into our waterways and oceans; affecting, choking and threatening marine species.

We are a volunteer based, (sea) grass roots community of ocean lovers, who educate and encourage the general public to say NO to disposable and single-use plastics, straws, take-away food and coffee cups through our regular beach cleans around the nation. We submit the data to the CSIRO and to Tangaroa Blue (the Australian Marine Debris Initiative). We

aim to be seen as role models for others to follow, and we actively encourage the disposable plastic-free movement to grow; especially the unnecessary plastics like straws and beverage receptacles that we use for only a few minutes. Role-modelling and stewardship are honourable, however that approach is merely a band-aid approach to the catastrophic chasm that plastic (and micro-plastic) pollution is affecting upon our oceans and threatened marine species.

Given that it is understood that between 4-12 million metric tons of plastic waste enters our oceans each year, the average concentration of plastic on the ocean's surface is over 9000 pieces per km² (and that's only 5% of the plastic ocean waste). We know the effects of entanglement, ingestion and bio accumulated poisoning from plastics; this surely warrants immediate legislation. We already know enough to take strong precautionary measures in these significant areas without the need for stalling for additional data.

Businesses need to take responsibility for their plastic footprint and adopt a #MakeItTakeIt policy. The government should introduce initiatives where the manufacturers are responsible for the return and/or refund of items that can harm or do not compliment and enhance the natural environment. This would decrease a significant amount of debris from entering our oceans and waterways. We cannot allow private interests and political allies to benefit as our oceans continue to deteriorate.

The only way to correct this mess is to start introducing and amending laws regarding production (and transportation) and imposing fines on companies that do not take responsibility for the accumulation of plastics that they produce. Basically, if they make it then they should have a plan to dispose of it responsibly.

Solutions must be sought to create avenues for our plastic consumption. This could come in the form of upcycling existing plastics or captured into other useful objects. This model is proving lucrative in Germany and the Scandinavian countries where they are importing waste from other European countries for their own benefit. A circular economy and industries have been created, where the plastics are being collected and reutilised before they make their way to the rivers and oceans. If stormwater drain devices were the norm at all drains, and if industry were to think of clever solutions for clearing them, then we could be on the way to finding an answer. There are many inventions that are being trialled globally with varying successes.

The inconvenient truths about marine plastic pollution require strong environmental laws and safeguards to be implemented swiftly. We need a responsible Government to act NOW, show initiative, lead the way and drive home the point that we need to change our current practice for the health of our oceans. The health of many marine species is at stake as well as the very life within the world's oceans. We cannot sit on our hands and wait for the change to happen; we must act NOW and change governmental policy. The research and sufficient scientific data has been done and the monitoring has already taken place. Government CANNOT manipulate public perception to stall political action

Education of the masses, and reinforcement through graphic advertising campaigns and petitions are a secondary way to tackle the problem. This is merely a token approach. Ugly images may be what is required to get the public to sit up and take notice of what is happening under the surface. Positive information campaigns should be rolled out nationally to raise public awareness and steer consumer behaviours. The ocean is Australia's playground and we must show respect to Mother Nature, and save her beautiful marine birds and cetaceans before it is too late.

It should be noted that this is a national problem. Community groups from regional country areas should be encouraged to participate in these forums also. The marine plastics issue isn't only for coastal dwellers as everyone in Australia must realise that 'we all live downstream' and whatever happens up the rivers, flows down to the sea. Beach and River cleans should be coordinated at the Community>State>National level so that comprehensive data can be collected. Extensive and thorough data should be monitored at the Community level to better reflect the source and exact locations of the aggregations so that local Councils can impose fines and seek solutions for better practice, directly at the source.

We urge the Government to take immediate action by banning heavily littered items such as disposable plastics, single-use plastic and biodegradable bags, polystyrene and Styrofoam single-use food take away beverage containers and straws. The data clearly indicates a correlation between these items and marine pollution. It would be easy to ban bags at point of sale and enforce a National Container Deposit Scheme if there were leadership, political will and competence on the issue. This would significantly reduce the amount of plastic that enters Australia's oceans and waterways.

Most importantly, Australian Government's Science and Research priorities should address the Microfibre, Microplastic (and Tyre dust) epidemic problem that is literally washing down our drains every minute. With every car that is being washed, every washing load that Australians put through their washing machines and dryers, and every downpour, trillions of tiny microplastic particles are washing down our drains as we simply don't have filters small enough to capture the tiny plastic microfibre particles.

The Surfrider Foundation Australia requests an active role in assisting to find solutions as we have been involved in the conservation of Australia's coastlines for over 25 years. We are deeply invested in the Ocean and feel that we would be a most valuable partner in this dialogue.