

Office of Resource Recovery  
Queensland Department of Environment and Science  
Brisbane  
QLD 4000

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[ResourceRecovery@des.qld.gov.au](mailto:ResourceRecovery@des.qld.gov.au)

## **Submission on Proposed Second Tranche Plastic Items Ban**

The Boomerang Alliance and our 55 allied organisations thank you for the opportunity to provide our views and feedback on the Queensland Governments proposal for a second tranche of single use plastic items ban.

### **In Brief**

**The Boomerang Alliance welcomes the Queensland Government bans on a second tranche of problem single use plastic items and urge some additional items be included (as outlined).**

**We strongly recommend that these proposed bans be introduced in 2022.**

**In keeping with the continuous improvement approach of the Plastic Pollution Reduction Strategy we urge that the government continues on its leading path to address other sector single use plastic problems, starting with 'At Home' plastic packaging concerning problem plastics from retail brought into the home.**

### **Background**

In 2018 Queensland banned lightweight plastic bags and introduced a container refund scheme. These measures resulted in a 70% reduction in plastic bag litter and over 50% reduction in container litter (as reported in 2020).

Following decisions to ban lightweight plastic bags and introduce a container refund scheme, the Queensland Government released its Plastic Pollution Reduction Strategy (PPRS) a broad and comprehensive framework to address problematic and unnecessary single use plastics. These included, single-use plastics in the home, away from home, in agriculture, in business and industry and in the marine environment. The PPRS framework seeks to find solutions to plastic waste and litter in all these outlined areas through a process of continuous improvement.

Upon its formal release in 2019, the PPRS identified away from home (takeaway) single use plastics as a first action to be addressed. It identified plastic straws, stirrers, plates, and cutlery as items to be banned and (after further analysis) coffee cups, other plastic cups, and heavyweight plastic bags.

After recommendations from retail, fast food sector representatives and environment groups, plastics bowls and expanded polystyrene products were added to that list.

In September of last year (2021), Queensland banned plastic straws, cutlery, plates and bowls and polystyrene containers. The bans have been generally well received by the retail, hospitality, and community sectors. Numerous polls show that the general public overwhelmingly support bans on these problematic products.

The alternatives, whether avoiding, using reusable containers, or switching to certified compostable items are all available and offer obvious and immediate solutions.

The Queensland Government is now proposing a second tranche of single use plastic bans consistent with policy intentions outlined in the PPRS.

### **Current Proposals and Consultation**

The proposed bans on outlined items (extract from public survey below):

**The Queensland Government is proposing that the following single-use plastic items be included in an expanded ban, where there is a suitable alternative to replace these items. Please select which items you would like banned:**

- Plastic drinking cups
- Takeaway coffee cups and lids
- Plastic dome lids (like those used for milkshakes and sundaes)
- Plastic wrapping on magazines
- All oxo-degradable plastics (such as magazine pouches/wraps)
- Heavy duty plastic shopping bags (such as department store bags)
- Balloon sticks/closures/clips
- Lightweight produce bags (e.g. fruit and vegetable bags)
- Expanded polystyrene trays (e.g. fruit and meat trays, serving trays)
- Loose expanded polystyrene packaging (such as the 'peanut' style fill foam)
- Cotton buds with plastic shafts
- Bread bag tags
- Microbeads in cosmetics
- Corflute tree guards

**The Queensland Government is considering whether the following single-use plastic items could be included in a future ban in the next five years, where there is a suitable alternative to replace these items. Please select which items you consider could be banned in the longer term:**

- Sauce sachets (tomato, tartare, soy, including soy fish)
- Bait bags
- Takeaway containers
- Balloons

## **Boomerang Alliance Recommendations**

The Boomerang Alliance supports the banning of all these listed items. These items are predominantly takeaway items or often littered. They can be avoided or replaced through practice change or preferred alternative products.

In keeping with the continuous improvement approach of the PPRS that started with addressing 'away from home' plastics, we recommend that the next tranche of plastics to be considered are 'at home' plastics, items brought into the home from retail and then often wasted in landfill and not recovered.

### **Introduce a Second Tranche ban in 2022**

To maintain the momentum, we strongly recommend that these items (above) be banned from September 2022. This provides sufficient notice to retail and hospitality sectors to change practices or switch to preferred alternatives. The Government has been very clear about its intentions for several years, enough time for any sector or

business to prepare for any required changes. However, we do recommend a retailer and community education campaign be introduced early in 2022 to support ban readiness.

### **Heavyweight Plastic Bags**

We note that Western Australia will ban heavyweight plastic bags in July 2022. It is clear that other jurisdictions need to act on these items as a long-standing plastic problem. In 2018 Commonwealth and State jurisdictions recognised the problem with heavyweight bags and sought an investigation into a suitable solution to their use.

The Boomerang Alliance has discussed this problem with the State Government (who were tasked to investigate thicker plastic bags) and representatives of retail and fast-food suppliers and the waste industry, and there is general consensus that reusable bags are the preferred solution.

By reusable, we mean bags that are designed to be reused multiple times for the same primary purpose (to carry shopping items to a destination). An international rule of thumb is a minimum 125 times. A reusable shopping bag needs to meet a reusable bag standard before it can be supplied by a retailer and then used by consumers. It is not appropriate to consider a bag reusable simple because it is thicker.

The Boomerang Alliance and our allies have provided the Queensland Government with our position and solution to heavyweight bags. It involves the establishment of a Reusable Bag Standard with only reusable bags that meet that standard available for sale by retailers. Our position recognises the need for a transition period to allow the Reusable Bag Standard to be set up. In this period thicker bags (sold today for 15 cents) can be sold for a minimum \$1 if there is a phase-out strategy and schedule in place.

\*Our position is supplied with this submission.

In the context of the second tranche, we recommend that this position and schedule be adopted and included as the government policy response. We consider this to be the most effective process to give all stakeholders the opportunity to transition away from heavyweight plastic bags and to make reusable bags common place and the standard option for all consumers.

## **No exemption for Integrated Packaging**

In the first tranche of bans, plastic straws, stirrers and cutlery included in integrated packaging (dried noodles, drink poppers etc) were exempted. The argument being that suppliers needed time to change and renew their stock. There has been sufficient time and one year later, that exemption should be removed in this second tranche.

## **Cotton Buds and microbeads**

Cotton buds with plastic stems and products still containing plastic microbeads should be included in the second tranche. Many manufacturers and suppliers are already moving to remove cotton buds with plastic stems and Queensland regulations would ensure compliance by all. Plastic microbeads have been the subject of a voluntary phase out and confirming through regulation would prevent those ignoring the phase-out from continuing to supply. Whilst the current list includes personal care products, it should also include cleaning products, all items likely to be discarded down the drain.

## **Compostability**

To be allowed in Queensland, a compostable product must meet either a commercial standard (AS 4736) or home standard (AS5810). Currently, commercial compostable items are allowed because non-plastic or home compostable versions are not readily available, when home compostable items become available to the market, commercially compostable items should be phased out.

## **Future Banned Items**

We note that the Government is also considering the future of other problem plastic items to be included in future bans (beyond the current second tranche) that include takeaway containers, sauce and condiment sachets, bait (and we also presume dog waste and ice bags) and balloons.

In our view takeaway containers should be included in the current second tranche bans. There are viable alternatives that are either reusable, non-plastic or certified compostable for both hot or cold beverages and food available in the market. If the government is not going to include takeaway containers in this second tranche, then it should set a date for these items to be banned as part of a third tranche in 2023.

For sauce and condiment sachets a similar approach could be taken by including these either in the second tranche or setting a date in 2023. These sachets are largely unnecessary and represent an unnecessary expense for consumers. The provision of self-serve sauces and condiments at the point of purchase is a better alternative.

Single use plastic bait and ice bags should be banned and replaced through a reusable bag service by providers. An associated discount off the next purchase promoting bag returns. Dog waste bags remain a litter problem when owners disregard litter regulations. Compostable bags do not solve the problem as many dog owners discard these, considering them 'biodegradable' and okay to litter. Solutions need to be found and we would urge these items to be included, if not in the second tranche, then in a third tranche in 2023.

Balloons when discarded are a well-recognised litter problem and threat to wildlife. In our view, the deliberate release of helium balloons are a priority. Whilst we recognise that this is a littering offence in Queensland, it is an offence often disregarded by event goers and managers, and rarely policed. We urge that the deliberate release of helium balloons be subject to legislation banning the practice in Queensland, and the provision of both balloons and helium be limited to registered suppliers, who adhere to "Pin it and Bin it" practices. Our position (below).

Boomerang Alliance (representing our 55 allied organisations) supports:

- a ban on any release of balloons - every State and Territory to introduce specific laws or amendments to existing laws to clearly ban any release of helium balloons (of any number)
- a ban on the sale of helium to the public to inflate balloons, with helium only available from businesses registered as balloon industry suppliers who can control the chain of custody, prevent releases, and arrange correct disposal (a national register of suppliers to be established or helium suppliers to provide only to registered industry suppliers)
- Every State and Territory to advise all relevant agencies, local government and event/hospitality sectors about the ban and provide adequate policing to monitor and impose financial penalties to ensure compliance.

## **Cigarette Butts**

As the most littered plastic item in Australia, cigarette butts should be added to the list for action. We propose that cigarette butts should now be included in a proposed third tranche for 2023.

Our view is that a national ban on cigarette filters should be considered by the Commonwealth and State/Territory jurisdictions. This should be included in the agenda for the Commonwealth Cigarette Butt Taskforce established under the

National Plastics Plan. We recommend that the QLD Government support this proposal.

In the meantime, butt litter will remain a major litter problem in QLD. As part of a third tranche of actions on single-use plastics, we recommend that the QLD Government investigate and introduce an EPR scheme for cigarette butts. This could be aligned with NSW Government EPR proposals to make tobacco and cigarette suppliers responsible for butt litter, with mandated cigarette butt litter reduction targets mandated.

### **COVID Protection Masks**

We favour reusable face masks but note that a considerable number of citizens are using disposable masks. These are, presumably, now discarded to waste bins or littered. Mask collection points, with appropriate and safe disposal now are required, particularly if masks remain in common practice.

**Special Note:** In the public consultation survey (Q10), the government poses possible other approaches before banning. These include considering recyclability and recyclable content, more enforcement and state-wide education.

Our response to these suggestions is to point out that items that contain recyclable materials are still littered (indeed all current problematic takeaway plastics that the government is proposing to be banned are already recyclable).

We support more recycled content in products as this creates a secondary market for plastics. However, there are plenty of other end markets and uses for recycled plastics beyond producing more single use items. Neither recyclability nor recycled content are justifications for not banning these problem products.

Enforcement and litter awareness should continue as complementary programs. However, we also note that these have been in place for decades and have failed to reduce litter and waste. These are measures that are ineffective unless part of a comprehensive suite of actions. Banning and making citizens aware of the bans, and then policing non-compliance is the better approach.

## **Boomerang Alliance recommendations for a Second Tranche Plastic Items Ban in 2022**

Plastic drinking cups  
Takeaway coffee cups and lids  
Dome lids  
Plastic wrapping on magazines  
All oxo-degradable plastics (not currently banned)  
Heavy duty plastic bags \*see Boomerang Alliance position paper  
Balloon sticks/clips  
Plastic Produce bags  
EPS produce trays and packaging  
Cotton buds with plastic shafts  
Bread bag ties  
Microbeads in cosmetics (and cleaning products)  
Corflute tree guards

With additions:

Plastic takeaway containers  
Integrated packaging items (straws, cutlery etc)  
Sauce and condiment sachets  
Bait, ice, and dog waste bags  
Legislated ban on deliberate helium balloon releases

The removal of exemptions for certified commercially compostable (banned and second tranche banned) items (AS 4736) when alternative non-plastic or home compostable (AS 5810) become fit for purpose and readily available in the market.

### **Third Tranche Actions in 2023**

The PPRS is a comprehensive and continuous improvement approach to addressing problem single use plastics. The first and second tranches have largely focussed on away from home (takeaway) plastics. This is appropriate as these items represent the most habitually littered items in Queensland. Used in public and outdoor spaces, they are either littered or placed in public place bins. The end result is that very few of these products are ever recovered. Avoiding, reducing, reusing, or switching to non-plastic or certified compostable items is therefore an appropriate and preferred solution.

The next steps should concern retail plastics, single use plastics and packaging bought at retail and brought home. These products are not a major litter problem but remain a significant waste and resource problem. Introducing policies that ensure that unnecessary packaging is avoided and reduced, and that packaging used is recovered, in practice and at scale should be the goal through a circular economy approach.

Currently, despite most business and households having a kerbside collection and many having the opportunity to compost, less than 20% of plastic packaging is recovered. The vast majority still ends up in landfill, after a single use.

For a third proposed tranche, the Boomerang Alliance has identified the following plastic items in retail for consideration below. Other items can be added. We have assumed that items already identified in second tranche or future considerations have been addressed or should be included with this list (below).

As a part of this third tranche, we also recommend the establishment of a State Government initiative to examine the potential for further reusable container use in Queensland. BYO cups are becoming more common and returnable containers for takeaway food are increasingly available. This initiative should examine how to better promote reusables and examine any impediments to uptake. This would complement any actions taken on avoiding, reducing, or eliminating problem plastic items listed below.

We note that establishing a circular economy approach to plastics and packaging needs a complementary national approach. In addition to taking policy action on this identified list we urge the State Government to:

- Support the introduction of national and binding standards for reusable, compostable or recyclable packaging. These should meet determined design, construction, use and disposal requirements that ensure that an item marked reusable, compostable or recyclable will be reused, composted, or recycled in practice and at scale, with suppliers responsible for delivery. Accurate and informative labelling should be used but only allowed where recovery and recycling targets are being achieved.
- Work with other jurisdictions to ensure a consistent and progressive approach to addressing these problem plastics is maintained.
- Support the removal of cigarette filters from cigarettes

We recommend the continuation of a Stakeholder Advisory Group to work with the State Government and assist with design and the most effective strategies to address ongoing waste and resource use for these third tranche products.

For retailer-based plastic items, there will be a range of options from avoidance and reduction, innovative new design, to reuse options. Packaging products purchased and taken away need to have obvious collection and recovery options for the consumer, with manufacturers responsible for ensuring that recovery happens in practice and at scale.

## **Boomerang Alliance recommendations for a third tranche of Plastic Item Policies**

### **In the Home (purchased through retail outlets)**

- plastic produce trays and single-use containers
- non-home compostable bin liners
- paper/plastic wipes containing microplastics
- plastic product wrapping (e.g., polythene) and cling film not required to prolong shelf life or food safety
- plastic food decoration (e.g., in sushi)
- plastic giveaway toys
- eps products (e.g., bean bag balls)
- bag and product ties and neck rings
- unnecessary double/secondary wrapping on putrescible/non-putrescible products
- stickers on fresh produce
- The use of single use plastic packaging used in the transport of goods
- Other items

With:

- support given to a national plan to remove cigarette filters and investigation into an EPR scheme to reduce for cigarette butt litter.
- Promotion of reusable cups and containers in retail, takeaway, events, and other controlled locations. Consider regulations to provide further legal protection and clarity for food service providers offering reusable container services.

## Conclusions

The State Government has established a well-regarded reputation as a progressive jurisdiction with effective policies on single use plastics. We urge this continues.

We support the proposed bans, with outlined additions and the maintenance of the Plastic Pollution Reduction Strategies continuous improvement approach.

Should you have further questions or need clarification of any of the points raised please contact us.

Signed



Jeff Angel  
Director



Toby Hutcheon  
Campaign Manager

\*Boomerang Alliance on heavyweight plastic bags attached.