



WESTERN AUSTRALIAN
LOCAL GOVERNMENT ASSOCIATION

WALGA Submission on *Consultation Regulatory Impact Statement (RIS); Investigation of options to reduce the environmental impact of plastic bags.*

This submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (the Association). The Municipal Waste Advisory Council is a standing committee of the WA Local Government Association, with delegated authority to represent the Association in all matters relating to solid waste management. This submission therefore represents the consolidated view of Western Australia Local Government. However, individual Local Governments may have views that differ from the positions taken here.

The Association congratulates the Environmental Protection and Heritage Council (EPHC) for its commitment to developing effective and efficient instruments for mitigating the issues associated with plastic bags. In particular, the Association supports the resolution to apply the chosen options to all 'point-of-sale' plastic bags. It is considered that the continued failure to reduce plastic bag litter; despite current voluntary measures leading to a substantial fall in the consumption of 'point-of-sale' plastic bags at supermarkets; supports a clear case for any action on plastic bags to be applied to all relevant businesses.

However, the Association disagrees with the report's selection of a mandatory charge (to be retained by the retailer) and/or a government enforced ban on plastic bags as the preferred options for further investigation. The Association feels strongly that it is the iconic nature of plastic bags which elevates its profile above other, arguably more damaging, waste types. It is questioned whether the environmental and social impacts identified in the report are significant enough, in and of themselves, to balance against the costs of implementing either of the two preferred options. It seems certain that industry is likely to argue that the potential benefits do not justify the costs.

It is considered that the instruments selected to address the issues associated with plastic bags should not only be focused on the reduction of plastic bag consumption and plastic bag litter. They should also seek to achieve the complementary objectives of distributing the responsibility and costs of general litter management more appropriately between government and industry; and engendering a behavioural change amongst the general public in how they view and treat waste through an ongoing education strategy. The options presented in the report are reviewed in the attached table in the context of how successfully they are considered to achieve these objectives.

It is not evident from the report why the options of a mandatory charge retained by the retailer and/or a ban on plastic bags are selected as the preferred options. Whilst both options do effectively reduce plastic bag consumption and plastic bag litter, they are unlikely to have any significant impact on litter management costs (as plastic bags make-up only 2% of the overall litter stream) or public behaviour generally. By contrast, the table illustrates that the options of a hypothecated levy or an advanced disposal fee act to significantly reduce plastic bag litter; whilst also providing funds for better overall litter management and public education programmes to drive behaviour change. Both of these options are also comparatively more cost-effective to implement than the preferred options.

As such, it is the considered opinion of the Association that the consultation report does not justify the selection of its preferred options over the introduction of a levy, advanced disposal fee or similar fund-generating mechanism. The Association strongly suggests that further investigation into a fee or levy-based type of instrument must be conducted in-conjunction with any further consideration of the report preferred options. A comparison of the net costs and benefits of each of these options should be undertaken with regard to litter management as a whole; not just in respect to reduced plastic bag litter. The results of this investigation could then be used to engage in an open and honest consultation with the community on the best way to move forward on the issues associated with plastic bags.

If you would like to discuss any aspect of this submission, please contact Megan Graham, MWAC Waste Policy Coordinator, on telephone (08) 9213 2086 or email mgraham@walga.asn.au.

Table 1: Review of the Proposed Options

Option	Reduction in plastic bag consumption (in millions of bags)	Reduction in plastic bag litter (in millions of bags)	Redistributes general litter management costs	Will it influence general public behaviour?	Net Impact (in millions of Dollars)
Option A: Enforcement	No	Yes	No	Yes	Unknown
Option B: Behaviour change	No	Yes	No	Yes	Unknown
Option C: Litter clean-up	No	Yes	No	To some extent	Unknown
Option D: Litter infrastructure	No	Yes	No	To some extent	Unknown
Option E: Advance Disposal Fee	Yes (20,732.5 mill)	Yes (300.5 mill)	Yes	Yes	-\$586.47
Option F: Baseline scenario	Baseline	Baseline	No	No	Baseline
Option G: Extension of ARA code	Yes (26,815.2 mill)	Yes (233.2 mill)	No	To some extent	-\$489.67
Option H: Industry imposed escalating charges	Yes (47,428.4 mill)	Yes (418.4 mill)	Possibly if charges hypothecated into central fund for litter management.	Possibly if charges hypothecated into central fund for education programmes.	-\$1026.80
Option I: industry and government plastic bag phase-out	Yes (48,570.9 mill)	Yes (422.4 mill)	No	Yes	-\$822.87
Option J: Minimum charge retained by retailers	Yes (41,500 mill)	Yes (360.6 mill)	No	Not effectively due to confusion created by variable charges.	-\$817.34
Option K: Government Levy	Yes (33,172.0 mill)	Yes (312.5 mill)	Yes – if Levy hypothecated into central fund for litter management.	Yes – if Levy hypothecated into central fund for education programmes.	-\$711.29
Option L: Ban plastic bags on Jan 1 2009	Yes (complete)	Yes (360.6 mill)	No	No	-\$839.30
Option M: Ban plastic bags prior to Jan 1 2009	Not Provided	Not Provided	No	No	Not Provided
Option N: Voluntary reduction of bags by 50% by 2007; to be replaced by alternative carry bags (high take-up and low take-up options)	Not Provided	Yes (111 mill)	No	To some extent	-\$392
	Not Provided	Yes (102 mill)	No	To some extent	-\$276
Option O: As with option N, but with continued reduction of 10% per year after 2007	Not Provided	Yes (148 mill)	No	To some extent	-\$706
	Not Provided	Yes (134 mill)	No	To some extent	-\$405