

13 May 2022

Single-use plastics policy team
Department of Environment, Land, Water and Planning (DELWP)
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Dear DELWP single-use plastics policy team

Single-use plastic items ban

The Municipal Association of Victoria (MAV) welcomes the opportunity to provide a brief submission in response to the draft Environment Protection Amendment (Banning Single-Use Plastic Items) Regulations 2022 and the associated Regulatory Impact Statement (RIS).

The MAV and Victorian councils strongly support the ban of single-use plastic items in Victoria as a means to reduce litter, avoid waste and accelerate the transition to a circular economy. We also look forward to reduced contamination in kerbside recycling bins as a result of the ban.

As noted in the RIS, councils incur significant costs dealing with littered and incorrectly disposed of single-use plastics. As strong supporters of the waste hierarchy, Victorian councils have long been advocates for a transition away from single-use plastics to avoid waste and encourage greater uptake of reusable alternatives.

We support the proposed definitions for “banned single-use plastic item” and “reusable” as set out in the draft regulations.

We support the proposed list of banned items and want it expanded to include additional items. Specifically we are calling for the list to more closely align with the [West Australian single-use plastics ban](#).

We understand stage 1 of the WA single-use plastic items ban started on 1 January and includes:

- plates
- bowls
- cutlery
- drink stirrers
- drinking straws
- cups
- thick plastic bags
- expanded polystyrene (EPS) takeaway food containers
- helium balloon releases.



Stage 2 single-use and disposable items to be phased out from 1 January 2023 include:

- barrier/produce bags
- microbeads
- polystyrene packaging
- polystyrene cups
- coffee cups and lids
- cotton buds with plastic shafts
- lids for cups and bowls
- oxo-degradable plastics (plastics designed to break up more rapidly into fragments under certain conditions).

We applaud the WA Government's decision to ban a more comprehensive list of items and to support implementation by using a staged approach.

We would also welcome a ban on the use of single-use plastic stickers on fruit which councils report cause significant issues for composting food waste.

It is disappointing that the RIS for Victoria's ban has not explored the cost benefits of including the additional items covered by the WA ban. We call on the Victorian Government to not miss this opportunity to address these high-volume problematic single-use plastics. At a minimum, the Victorian Government should commit to considering additional items for inclusion in the ban at least every two years until a comprehensive single-use plastics ban has been achieved.

In relation to the proposed exempted items, councils do not support the inclusion of paper or cardboard plates lined with any plastic, noting that reusable alternatives do already exist.

In relation to integrated items, we acknowledge that there will be implementation challenges for manufacturers and packaging suppliers to remove these items from packaging. That said, we consider the proposed exemption for integrated items until 31 December 2025 excessive. We call on the Victorian Government to reduce the period of the exemption for integrated items to 2024 at the latest.

The RIS estimates the implementation costs to government (DELWP and EPA) at \$380,000 over ten years and the compliance and enforcement costs at \$170,000 over ten years. We question whether these costs are understated and, if not, whether this signals a very hands-off approach by EPA for compliance and enforcement.

We are also keen for more detail on the twice-yearly litter audits DELWP will undertake to measure the effectiveness of the ban. It is not clear if councils will be required to provide input to those audits. We note that no costs to local government have been identified in the RIS.

Finally, we note that education of the community and of the retail and hospitality sectors will be critical to the success of the ban. We encourage the State to consider use of incentives, grants and other support for product innovation to enable Victoria to move to a more comprehensive single-use plastics ban in the near future.

Should you have any queries about this matter, please contact Troy Edwards, Executive Director – Policy & Advocacy, at tedwards@mav.asn.au.

Yours sincerely



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