

18/12/15

Re: draft Metropolitan Waste and Resource Recovery Implementation Plan (W&RRIP).

Thank you for the opportunity to comment on the W&RRIP. Port Phillip EcoCentre Inc is a not-for-profit environment organisation which has been operating in St Kilda for the past 16 years. Our organisation has a commitment to action research and adopting practical solutions to environmental issues. We currently enjoy strong partnerships with Traditional Owners, state and local government, community groups, schools, businesses and philanthropic organisations in our region.

For the past 5 years Port Phillip EcoCentre has been a leading organisation in the field of marine plastics research in Port Phillip Bay and its catchments. Over that time the EcoCentre and affiliate groups have compiled substantial data demonstrating significant levels of plastic pollution, primarily post-consumer single-use plastic items. On that basis we are compelled to draw attention to the absence of waste avoidance education and infrastructure to eliminate plastic pollution of waterways.

The Australian government has recognised marine debris as a key threatening process, because of the potential harm it poses to wildlife. In 2003, 'injury and fatality to vertebrate marine life caused by ingestion of, or entanglement in, harmful marine debris' was listed as a key threatening process under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act). Despite compelling evidence of significant volumes of plastic waste entering our waterways to the detriment of ecosystems (toxic and physical hazards to aquatic life) **there is no market-based mechanism to address this issue**. As a consequence of the Market Assessment Guide having been derived from the waste management industry there is no mention of waste avoidance and reduction.

As consumption and disposal patterns change, so too will the waste streams that require management. CSIRO scientists have calculated that global production of plastics will exponentially increase over the next 10 years (the timeframe of the Waste Plan). Without significant infrastructure and education to minimise plastic litter, this exponential production/consumption a proportionate increase in plastic pollution of waterways can be expected. As the W&RRIP is required by legislation to articulate how the waste and resource recovery needs of the region will be met over at least a 10-year period development of innovative strategies to eliminate plastic pollution of waterways should be included as priority component of Victorian waste management. CSIRO research indicates the "need to address the [litter] issue at sources rather than where it accumulates" and that "investment in programs led to a larger reduction and more predictable [marine debris] reduction than investment in facilities."¹

Leadership to address systemic issues is a fundamental expectation of the role of government. The omission of plastic pollution reduction initiatives in the W&RRIP is also sadly reflected in the submissions to the current Federal Government Enquiry into Marine Plastic Pollution in Australia. Of the 190 submissions received, just one (from Parks Victoria) was submitted by a Victorian state or local government agency.

Given the current levels of plastic pollution recorded in our waterways and the predicted exponential increase in plastics consumption, failure to address plastic pollution in waterways is a serious omission which defies and denies any attempt to nurture a culture of sustainable waste management. Increased resources are required for further research into plastic pollution in rivers and stormwater systems, to identify land-based sources of plastic pollution, to inform effective local litter reduction strategies. Further innovation to improve litter trapping technologies is required.

Please contact me on [REDACTED] should you require further information or clarification on any aspect of this submission.

Yours sincerely [REDACTED]

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¹ TJ Lawson, BD Hardesty, C Wilcox and C Maureaud, 2015