

# NARGA

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5 October 2006

Ms Anthea Tinney,  
Deputy Secretary  
Department of Environment and Heritage  
GPO Box 787  
Canberra ACT 2601

By email: [anthea.tinney@deh.gov.au](mailto:anthea.tinney@deh.gov.au)

Dear Anthea,

**Re: Review of plastic bag studies used as a basis for EPHC policy and response**

We are writing to you to request a review and revision of the data used to underpin EPHC policy on supermarket plastic shopping bags, the objective being to have a more reliable data set in place before the next EPHC meeting.

You have been made aware of the shortcomings of the original DEH / Nolan-ITU report on plastic shopping bags<sup>1</sup> (the report) which gave the impression that plastic bags made a significant contribution to overall litter and that, as a result, were a substantial factor in marine animal mortality attributable to entanglement in marine debris.

We have previously expressed our concern in relation to the lack of accuracy and rigour involved in this report and other statements attributable to DEH, and subsequently ministers and environmental agencies in other jurisdictions.

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<sup>1</sup> Plastic Shopping Bags – Analysis of Levies and Environmental Impacts – Final Report, December 2002, DEH, Nolan-ITU et al.

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In particular, the following inaccuracies are of concern:

- Under "Animal Impacts of Litter" on page 30 of the report it is stated that: "A figure of 100,000 marine animals killed annually has been widely quoted by environmental groups; this figure was from a study in Newfoundland which estimated the number of animals trapped by plastic bags in that area over a four year period from 1981 – 1984." An Environment Canada website was quoted as the source of this information. However, its content was not accurately reflected in the above quote (the website did not include the word 'annually' nor indicate that plastic bags were the specific problem) and the original study referenced was about entanglement in fishing nets – not plastic bags.

It is not clear why DEH and its consultants chose to use (or misuse) Canadian data to demonstrate environmental impacts when local data on marine litter was available at the time. As previously reported, the DEH website carried the State of the Marine Environment Report to which we have previously referred. It did not refer to plastic bags as a problem. Other local data was also available.

- The second source of error comes from the estimates used for the proportion of plastic bags littered. The report makes various references to that quantity including a reference in Fig E2 to 0.8% of bags ending up as litter and a reference on page 8 of the report which suggests 'a total of between 50 and 80 million bags enter the environment as litter annually.' Apart from a suggestion that around 20% of plastic bags used away from home are littered and an assumed contribution to litter from waste management activities there is no data to back up this estimate. Even the figure used as a basis for plastic bag outdoor use is made up.

A simple 'reality check' on the 80 million bags litter estimate would have shown it to be in error.

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The impact of these errors is insidious and ongoing as demonstrated by the following:

- Both the marine kill data and plastic bag litter data have been repeatedly quoted on numerous websites, in the media and in other studies. The data has also been used to justify legislation targeting plastic bags in Victoria.
- The data has been used to justify current EPHC policy
- The data has been used in the subsequent report by the Allen Consulting Group (ACG) on the costs and benefits associated with a range of plastic bag reduction options, inflating the 'benefit' side of the equation in two ways – by exaggerating the number of bags that would be removed from the litter stream under each policy option and exaggerating the value to the environment of doing so.

We do note that ACG adjusted the estimate of the number of littered bags that they used as a basis for their analysis by subtracting the estimated 10 – 20 million bags estimated as having been removed by litter clean up (Diagram 2.6 page 9 of the report). Again we emphasise that this clean-up figure has no factual basis, and hence the final figure used by ACG in its analysis cannot be relied upon.

We would like to explore the estimate of plastic bags littered further. If it were true that a net 40 – 60 million plastic bags (50 – 80 less 10 -20 million) entered the environment each year, there would be substantial numbers of plastic bags in every street. As these quantities of bags have been in use (and presumably littered to the same extent) for over 20 years, we are talking about an accumulation of over 1 billion bags on our streets.

Where are they?

We would suggest that there has been a gross overestimation of the number of bags littered, with both the figures used to estimate the number of bags entering the environment as litter and being removed from the environment in clean-up activities having no factual foundation.

We ask that the following corrective action be taken:

- That ACG be asked to revise the costing in the various policy scenarios using a substantially reduced estimate for the number of plastic bags that stay in the litter stream, and a figure substantially less than \$1.00 for the value of each plastic bag removed from litter (as the marine kill data is fictional).
- That the above revision be ready in time for the next EPHC meeting
- That DEH removes from its website the inaccurate information relating to marine animal impact and plastic bag litter numbers, and write to each jurisdictional environment minister and agency requesting the same correction of the facts.
- That DEH undertake a review of local government and NGO websites and, where these sites quote the inaccurate data, advise them of the correction that is required to that information.
- That DEH includes in the current copy of the report, available on the DEH website, a prominent disclaimer outlining where and in what aspects the report cannot be relied upon.

We await your urgent response.

Yours sincerely,

Ken Henrick  
**Chief Executive Officer**  
National Association of Retail Grocers of Australia