



BeachPatrol Australia

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EPA Submission **Control of Plastic Nurdles**

The single biggest environmental challenge to face will be the issue the pollution caused by our use of disposable plastic items. This list includes plastic bags, drink bottles, straws, coffee cup lids, plastic cups, cutlery, plates, shrink wrap, candy bar wrappers and more. Over the last 20 years the unmanaged production of plastic items has increased substantially. We used more plastic in the last 10 years than all of previous time. Over 4 Billion bottles are consumed in Vic alone. Only 25% of the plastic are recycled. We don't know the number of straws but it will be in the billions. There are over 50 billion bags littered every year in Aust. You can no longer go for walk in our parks beaches or down a street without seeing littered bottles and bags. Every few 100 m one of these will be seen. Around our house in Port Melbourne (not a high traffic area) we picked up 112 bottles in 3 km. That is a bottle every 26 m.

At the front of this is the small preproduction pellets Nurdles. These are a huge problem in their own right. They are now found everywhere on our lands, river banks and in waterways.



Picture of Nurdles on the ground outside a Melbourne factory 2015. Photo courtesy of EcoCenter

In Beachpatrol we find them along many beaches in the 1000's at a time¹. They are too small to pick up. There is quite a bit of evidence of them resembling food for wildlife with dire consequences^{2,3}.

Controlling and reducing this is going to be a big challenge. However due to the relatively low number of users in Victoria, dozens not 100's, it makes their control more manageable and a simpler task to implement change. It will involve regulations on manufacturers who are going to fight it



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quite aggressively. For example the Nurdles ought to be classed as a hazardous good. This would result in

- a) minimum packaging requirements,
- b) approved transport methods,
- c) approved storage and handling methods,
- d) registration of users and suppliers
- e) training programs on their handling and spill cleanup and reporting procedures

Educating the plastic nurdle users about their danger and winning their support for the above will be critical. They have been an unregulated product for all their industry use and to now introduce these necessary controls will face resistance. Hence the necessity to fully present the problem and the solution to it will be necessary. Users will face some initial compliance costs, but once those changes are in place it would not be that much more expensive to operate than it is now unless they did something wrong.

2) The EPA needs to be a body who can investigate breaches of laws and quickly issue prevention advice and penalties to the guilty parties.

The EPA needs to be able to get laws passed without then getting bogged down in politics.

The EPA needs to have qualified and experience staff on staff who can review and research issues then bring about effective solutions for the betterment of the environment, not what political wind is blowing at that time.

The EPA should be easy for people to report to for environmental issues.

3) Work in Partnership with government agencies. It is far easier to put rules in place up front than try to implement them at a later date. For too long now manufacturing companies and distributors have been able to sell virtually what they like packaged how they like. Now having put to regulations on this is proving time consuming, causing complaints by industry about extra costs, resulting in more environmental damage while this inaction is crawling along.

4) Role in safeguarding The EPA needs to be more strict about making sure procedures are followed in respect to manufacturers/distributors discharge products, waste products, spills, handling procedures for hazardous goods.

Hazardous goods should not be just those limited to immediate human health. But broadened to health of the wildlife and fauna. We all co-live in the same ecosystem and doing damage to one part does not mean other life forms will not be affected. Rather it will have follow on effects to the other species over time. For example the plastic nurdles mentioned above.

References



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- 1) www.beachpatrol.com.au
- 2) <http://theconversation.com/eight-million-tonnes-of-plastic-are-going-into-the-ocean-each-year-37521>
- 3) https://en.wikipedia.org/wiki/Plastic_particle_water_pollution