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4 November 2024

Re: NSW Plastics: The Way Forward paper

The Member Councils of the Hunter Joint Organisation (JO) welcome the opportunity provided by NSW Environment Protection Authority (EPA) to provide feedback on the *NSW Plastics: The Way Forward* (draft for consultation) outlining proposed actions on reducing the harm caused by single-use, unnecessary and problematic plastics.

The ten Mayors of the Hunter Region, through the Hunter JO have identified circular economy and waste management as important areas for advocacy, collaboration and collective action to enhance liveability in the region. Liveability is one of four core regional priorities in the Hunter region: "Protect, preserve and improve the high standard of liveability and pristine environments that we enjoy in our region." More specifically, the [Hunter JO Strategic Plan 2032](#) identifies the following key objectives and strategic directions:

- Objective 4.2 – making use of our opportunity to drive circular evolution of our region's economy.
- 4.2.1 Support meeting our future regional infrastructure and operations for circular outcomes.
- 4.2.2 Reduce carbon emissions through better waste and materials management.

Furthermore, the [Hunter and Central Coast Regional Circular Materials Strategy 2022-2027](#) outlines four region themes critical to achieving a circular economy in the Hunter Central Coast region:

- Protect the Environment: Improved problem waste management and disaster resilience
- Circularity: Enabling and influencing the circular economy
- Resource Recovery: Improved infrastructure and operations for circular economy
- Collaboration: Collaborating to solve regional problems for greatest positive impact.

The Hunter JO considers that reducing the prevalence of single-use plastics in the economy will assist in the creation of a more circular economy and help to further reduce these items being littered or being deposited as waste in landfill facilities.

In this regard, the proposed actions in the draft paper are supported, however a more holistic approach to plastics reduction in the environment and much quicker action to remove harmful products from the marketplace is both desirable, and necessary.

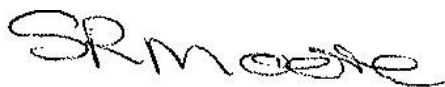
The recommendations included in the attached submission include:

- All revenue generated by the waste levy be hypothecated to fund the significant and sustained level of investment required to drive the implementation of circular economy and local and regional waste management initiatives, such as:
 - reducing plastic litter,
 - reducing harmful chemicals in plastics and microplastics, and
 - keeping pace with plastic action.
- Funding ongoing statewide communications campaigns and the development of other resource materials that support the behaviour change required to achieve these actions on plastic food packaging and other plastic waste items.
- Recognising that local government does not have the resources available to mount such communications campaigns to educate the community about the proposed actions on plastic pollution.
- Ensuring that urgent steps are taken to fast-track the planning and development of Materials Recycling Facilities infrastructure (using new technologies for recycling plastics) in key regional locations, to manage expected increase in waste volumes.
- Leading collaboration with regional waste managers and industry groups to develop markets for recycled plastic products that are certified safe for commercial and household use.
- Working closely with State and Territory Governments and the Commonwealth Government to harmonise regulations on chemical certification and labelling schemes relating to plastics and microplastics.
- Working closely with Commonwealth Government and the Resource Recovery industry to advocate for the regulation of material composition complexity of consumer products placed on the Australian market.
- Working closely with industry, recyclers and local government towards plastic barrier bags that are compostable in an industry standard composting facility, tested for earthworm toxicity, usable both as fruit and vegetable bags and reusable as caddy liners.

We encourage you to consider our recommendations in determining the focus and scope of the current review process.

Should you have any further queries please don't hesitate to contact Eloise Lobsey, Program Lead – Circular Economy, Hunter JO at eloisel@hunterjo.nsw.gov.au.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'SR Moore', with a stylized flourish at the end.

Cr Sue Moore
Chair, Hunter Joint Organisation

Submission: Recommendations to inform the NSW Plastics: The Way Forward

The Hunter Joint Organisation is the statutory local government entity established by the NSW Government, through the *NSW Local Government Act 1993*, to support the Councils of the Hunter Region work together for better rural and regional outcomes, and to enhance the way local and state governments work together to plan and deliver important regional infrastructure and investment.

Member Councils of the Hunter JO include:

- Cessnock City Council
- Dungog Shire Council
- Lake Macquarie City Council
- Maitland City Council
- MidCoast Council
- Muswellbrook Shire Council
- City of Newcastle
- Port Stephens Council
- Singleton Council
- Upper Hunter Shire Council

The core statutory functions established by the NSW Government for the Hunter JO include:

1. Strategic planning and priority setting – to establish strategic regional priorities for the Joint Organisation area and to establish strategies and plans for delivering those priorities.
2. Intergovernmental collaboration - to identify and take up opportunities for inter-governmental cooperation on matters relating to the Joint Organisation area.
3. Shared leadership and advocacy - to provide regional leadership for the Joint Organisation area and to be an advocate for strategic regional priorities.

This submission is also supported by Central Coast Council, who is a member of the Hunter Central Coast Regional Waste Group.

Our response to the proposed actions contained in the *NSW Plastics: The Way Forward* paper is provided below:

General comments:

The Hunter JO considers that the overall approach taken to the reduction of single-use plastics in the environment in this paper is piecemeal and focused too far down the waste hierarchy – that is, on waste management rather than product design.

The Hunter JO believes that a more holistic approach to the problem of plastics in the environment is required including nationally consistent regulations and more urgent action prioritised at the product design phase, rather than waste management stage.

Local government will need additional resources in order to assist with many of the proposed actions, especially those impacting on its waste collection and recycling services.

The Hunter JO firmly believes that revenue generated from the waste levy should be hypothecated to fund measures to deal with the impact of expected increase in waste volumes, changing complexity of materials in the waste streams they manage, potential contamination of kerbside recycling and efforts to change the behaviour of consumers and householders.

Reducing plastic litter – proposed actions:

<p>Phasing out of single use items (i.e. lollipop sticks) (2025)</p> <p>Increase transparency of litter data (2025)</p> <p>Require brand owners of highly littered plastic items to set reduction targets (2025)</p> <p>Require acceptance of reusable cups (2027)</p> <p>Require single use plastic cups/containers/lids to be recyclable and include the Australian Recycling Label (2027)</p> <p>Collaborate with other jurisdictions on a national approach to reduce littering of cigarette butts (2027)</p> <p>Require anti-littering messaging in take-away food shops (2030)</p> <p>Extend use of CDS sites to include plastic cups and containers (2030)</p> <p>Require plastic lids to be tethered to bottles (2030)</p> <p>Require single-serve condiment packages to be recyclable (2030)</p>

Response:

The Hunter JO supports each of the proposed actions as small, interrelated steps towards reducing the problem of plastic litter in our environment, and further, towards a more circular economy. However, the bulk of responsibility and costs of managing plastic litter under these proposed actions will remain with local government through its waste collection services, and associated Materials Recycling Facilities.

There is also a significant missed opportunity to educate the community more broadly about the specific harms of plastics in the environment, and to encourage consumers to replace all single-use plastic items with reusable alternatives.

Any implementation of the proposed steps to reduce plastic litter will require additional resources to be allocated to local government to manage the expected increase in waste volumes, contamination of kerbside recycling, and efforts to communicate the changes to consumers and householders.

Recommendations

- Supporting these actions, all revenue generated by the waste levy should be hypothecated to fund the significant and sustained level of investment required to drive the implementation of circular economy and local and regional waste management initiatives, such as the proposed actions to reduce plastic litter.
- Supporting these actions, the NSW Government (via EPA and not local government) must fund ongoing, statewide communications campaigns and other resources focusing on the required behaviour change to achieve the desired outcomes for plastics reduction.
- Supporting these actions, the NSW Government (via EPA) must ensure that urgent steps are taken to fast-track the planning and development of Materials Recycling Facilities infrastructure (using new technologies for recycling plastics) in key regional locations, to manage the expected increase in waste volumes.
- Supporting these actions, the NSW Government (via EPA) lead collaboration with regional waste managers and industry groups to develop markets for recycled plastic products that are certified safe for commercial and household use.

Reducing harmful chemicals in plastics and microplastics – proposed actions:

Phasing out the supply of plastics containing pro-degradant additives (2025) Phasing out all microbeads from all cleaning products (2025) Eliminating harmful chemicals in food packaging (2027) Publishing a 'red' and 'green' list of chemicals to be used/ avoided (2027) Rating of new washing machines on microfibre filtering capability (2027) Supporting increased chemical testing capacity in food packaging (2027) Introducing a voluntary chemical certification and labelling scheme for food packaging (2027) to be mandatory in five years.
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Response:

The Hunter JO supports each of the proposed actions as small, interrelated steps towards reducing harmful chemicals in plastics and microplastics, and a more circular economy.

However, it is unclear from the paper how the proposed actions will be implemented, and which agencies will be responsible for enforcing compliance. It is likely that local government will be at the forefront of managing the wide variety of potentially harmful additives in plastic products for decades to come, through its waste collection and recycling services.

For this reason, the Hunter JO supports concerted national action to reduce all harmful chemicals in plastics and microplastics. This should include proactive advocacy by the NSW Government to federal agencies to regulate the composition of consumer products allowed to be placed on the Australian market to reduce harm to humans and the environment, but to also assist with product recyclability by reducing the material composition complexity resource recovery facilities are required to handle. This would also assist positive recycling behaviours in the community by reducing the complexity of household level source separation.

Recommendations

- Supporting this action, the NSW Government should work closely with State and Territory Governments and the Commonwealth Government to harmonise regulations on chemical certification and labelling schemes relating to plastics and microplastics.
- Supporting this action, the NSW Government should work closely with Commonwealth Government and the Resource Recovery industry to advocate for the regulation of material composition complexity of consumer products placed on the Australian market.

Keeping pace on plastic action – proposed actions:

Adopting Queensland’s reuse/recycle content standards for heavyweight film plastic shopping bags (2025) and requiring such bags to be stored out of sight (2025) Phasing out supply of plastic balloon sticks/clips/ties and release of lighter-than-air balloons (2025) Phasing out use of expanded polystyrene foam in food trays, packaging and fill (2025) Phasing out supply of unnecessary plastic barrier bags (2027) Requiring ARL labelling of plastic barrier bags (2027) Phasing out most plastic tags, pizza savers (2027) Eliminating harmful chemicals from plastic shopping/barrier bags (2027) Fruit and vegetable stickers to be compostable (2030)

Response:

The Hunter JO supports each of the proposed actions as small, interrelated steps towards keeping pace on plastic action and further, towards a more circular economy.

However, as outlined in the paper, the current fragmented approach to banning certain plastic items in some States and Territories and not in others is leading to confusion. It requires rapid harmonisation of plastics regulation across borders to secure a more holistic approach to taking action to reduce the myriad harms associated with plastic products.

Recommendations

- All revenue generated by the waste levy be hypothecated to fund the significant and sustained level of investment required to drive the implementation of circular economy and local and regional waste management initiatives, such as proposed actions to keep pace with plastic action.
- Supporting this action, the NSW Government should work closely with State and Territory Governments and the Commonwealth Government to harmonise all regulations on plastic action.
- Supporting this action, the NSW Government should work closely with industry, recyclers and local government to move towards plastic barrier bags that are compostable in an industry standard composting facility, tested for earthworm toxicity, usable both as fruit and vegetable bags and reusable as caddy liners.