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NSW 20-Year Waste Strategy Development Team
Department of Planning, Industry and Environment
By Email: 20YWS@elton.com.au

To whom it may concern,

NSW 20-year Waste Strategy Issues Paper and NSW Plastics Plan Discussion Paper

Thank you for the opportunity to comment on NSW Government's 20-year Waste Strategy Issues Paper and NSW Plastics Plan Discussion Paper (March, 2020).

The Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine member Councils who represent 1.3 million Sydneysiders. Our goals include waterways and foreshores being protected and healthier, and marine biodiversity protected in the bioregion.

The SCCG has reviewed the Waste Strategy Issues Paper and Plastics Plan Discussion Paper and provides the following comments.

We support the proposed principles that underpin the 20-Year Waste Strategy, recognising the circular economy with sustainable use of materials, maximising materials recovery and product stewardship, especially reducing waste as far upstream in the product lifecycle as possible.

The SCCG commends the acknowledgement of the problem with marine litter, stating that plastic harms our oceans and marine wildlife and that 8 million tonnes of plastic leaks into our oceans every year. Data shows that plastic is by far the largest contributor to litter along the Australian coastline and the plastic hotspot in the Pacific Ocean is twice the size of NSW. There is also an alarming prediction that by 2050, there will be more plastic by weight in the ocean than fish. The large amount of microplastic in the ocean exacerbates the problem, with harmful ingestion of plastic occurring broadly across marine life.

Similar to the 20-Year Waste Strategy Issues Paper, the Plastics Plan Discussion Paper proposes a whole-of-lifecycle approach (from production, through to disposal and management of waste) to tackle the challenge of plastic waste. We support this approach but consider that the proposed Plan would not go far enough to address the immediate problems with litter contamination of waterways and the marine environment. We therefore recommend stronger measures.

There is an important opportunity to tackle the current waterway and marine impacts from litter through better coordination through the actions outlined in the NSW Government's Marine Estate Management Strategy (MEMS). The MEMS is a ten year strategy (2018-2028) that provides the overarching framework for coordinated management of the marine



estate to deliver its vision for 'a healthy coast and sea, managed for the greatest wellbeing of the community, now and into the future'. A key action under Stage 1 relates to managing marine litter:

Action 1.4 Implement a targeted marine litter campaign and establish a Marine Litter Working Group, which proposes to deliver -

- *research that has identified marine litter priorities and informed the development of marine litter campaigns that raise awareness of the impact of litter on the marine estate, and change behaviours*
- *a targeted marine litter campaign across NSW, supported by targeted campaigns in local litter hotspots. Campaign materials are publicly available to support community and local government action*
- *research and information on the effects of marine debris, to inform the development of priority actions for reducing marine litter.*

The SCCG understands that under Stage 1 implementation of MEMS, a marine litter campaign will be rolled out along with the establishment of a Marine Litter Working Group. This working group will develop a threatened risk assessment methodology that will determine the risk of certain marine litter and will assist in developing appropriate management actions and reducing this items at their source.

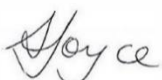
The Plastics Plan Discussion Paper states that appropriate management of end-of-life plastic can help reduce the leakage of this material into the environment. We agree with the statements in the Discussion Paper, that improving community awareness, engaging users of specific plastic items and making producers of plastic items more responsible for the financial costs of managing litter could all help reduce leakage of plastic into the environment.

However, SCCG urges NSW Government to give high priority to initiatives that achieve environmental outcomes in the short term, such as investigating the potential for reducing pollution from plastic litter through infrastructure that captures plastic before it enters the environment. Details on expected timeframes for installation of the infrastructure should be specified in the Plastics Plan. Consideration should also be given to grant funding for councils to expand their Gross Pollutant Trap programs, particularly to assist in maintenance which is an onerous and ongoing task. Such operational initiatives to remove litter would be expected to have immediate and tangible outcomes on reducing litter and plastic pollution in waterways and the marine environment.

It will be important for the NSW Plastics Plan to acknowledge the immediate threats and impacts of litter on waterways and the marine environment and include objectives to identify litter sources, develop management measures in the short term and to coordinate these objectives with other current NSW Government initiatives in collaboration with relevant agencies.

I look forward to the next stages in developing the NSW 20-Year Waste Strategy and NSW Plastics Plan with the release of the draft waste strategy and opportunity for further comment.

Yours sincerely,



Sarah Joyce
Executive Officer

