

SYDNEY COASTAL COUNCILS GROUP Inc.
PO Box 999
Manly NSW 1655

Email: info@sydneycoastalcouncils.com.au
Web: www.sydneycoastalcouncils.com.au
ABN: 39 638 876 538



Reference:025-22

24/06/2022

EPA Head Office,
Locked Bag 5022
Parramatta NSW 2124

Re: SCCG Contributions to EPA Roadshow Ballina

To whom it may concern,

The Sydney Coastal Councils Group (SCCG) would like to thank the NSW Environment Protection Authority (EPA) for the opportunity to attend and contribute to the EPA Roadshow in Ballina on the 7 June 2022.

The SCCG valued the opportunity to participate in the round table discussions and would like to formalise their contributions to the workshops on the following topics: emerging threats, litter prevention, organic waste, compostable packaging, and water pollution.

A summary of recommendations pertaining to these topics is at Attachment 1.

We ask that the EPA considers the SCCG's recommendations in resolving the issues identified.

Yours sincerely,

Sarah Joyce
Executive Officer



Sutherland Shire
COUNCIL

INNER WEST COUNCIL



WAVERLEY
COUNCIL



Bayside Council

northern
beaches
council



WILLOUGHBY
CITY COUNCIL
City of Diversity



Randwick City Council
a sense of community





Sydney Coastal Councils Group Recommendations

EPA Roadshow Ballina – 7 June 2022

| Topic | Recommendation |
|------------------|---|
| Emerging Threats | <p>Recommendation: The EPA to take a more proactive role in investigating, monitoring and assessing the threats of emerging contaminants of concerns in particular pharmaceuticals and antimicrobial resistance [and fill knowledge gaps in NSW.</p> <p>Background In 2020 the Council of the Australian Governments (COAG) endorsed the National Antimicrobial Resistance Strategy – 2020 and Beyond, in recognition of the threats posed by antimicrobial resistance (AMR) to the nation’s health security. The 2020 strategy sets a 20-year vision to tackle this national “high priority threat” through concerted and integrated efforts in the human, animal and environment domains. The strategy and its implementation continue to align with the World Health Organisation’s Global Action Plan on AMR.</p> <p>Responding to the Commonwealth commitment, EPA Victoria, Department of Health and Agriculture Victoria mobilised to lead the Victorian AMR response. A large emphasis of the state AMR strategy will be placed on water and wastewater discharges in contributing to AMR dissemination. Urban waste-stream infrastructure is a critical interface because it continuously receives huge loads of human and animal faecal materials that are replete with microbes carrying AMR genetic cargo or AMR free DNA. Through processes of sewage overflow or effluent discharge, resistant microbes that persist can confer resistance to environmental microbiota in the receiving (aquatic) environment, thereby exposing humans and animals that use the aquatic environments for recreation and food supply to increased risks of acquiring resistant infections.</p> <p>EPA Victoria, as the state’s primary water pollution regulator, has been actively monitoring the prevalence of pharmaceuticals and AMR genes and bacteria in the state’s main water catchments. This has helped to establish better understanding of the baseline level of risks present in the environment.</p> |

| | |
|-------------------|--|
| | Initially, NSW should close some of the knowledge gaps around the level of risks in NSW's context as this would inform the need (or not) for further actions and begin to be proactive in this space. |
| Litter prevention | <p>Recommendation: The EPA to take a more active approach to:</p> <ol style="list-style-type: none"> 1. facilitate communication within and across councils and Regional Organisations of Councils (such as the SCCG) to initiate collaboration and build our case for project implementation; 2. champion more Waste Levy funding to go to councils as non-contestable funding and for use across the breadth of waste management and resource recovery services; and 3. champion more flexibility for councils to fund all waste management related services, under the Domestic Waste Management charge. <p>Background Now that litter prevention is no longer a premier's priority, it can be even more challenging to get councils on board with us to focus on this area. Regarding Waste Levy funding sources, as we understand, it is likely that a lesser amount of the Waste Levy will go to the non-contestable component of funding for councils, creating an onus on councils to fund the breadth of waste management services from other sources ie. general rates and/or contestable funding. Furthermore, the proportion of Waste Levy revenue returned to councils and/or made available for grants has been trending downwards over some years, whilst the Waste Levy has increased. Justification for more flexibility under the DWM charge is on the basis that a range of waste management services directly impact the volume of waste going to landfill and resultant Waste Levy charges to Council including:</p> <ul style="list-style-type: none"> - Services that create increased volumes of waste, including collections of waste from street sweeping, public place rubbish bins, littering and illegal dumping. - Services that result in reduced volumes of waste to landfill, including waste minimisation and resource reuse initiatives, education and litter reduction campaigns. |
| Organic waste | <p>Recommendation: EPA to regulate and subsidise organic waste collection for businesses.</p> <p>Background There is no economic incentive for small businesses to contract organic waste collection services.</p> <p>Firstly, it is more expensive than collecting general waste. For example, it generally costs at least double the price to have organic food waste collected (\$13.00 for 120L bin – ORG quote, Sydney) than placing organic waste in a general rubbish bin (\$13 for 240L bin – Cleanaway quote, Sydney).</p> <p>Secondly, it takes more effort and staff training to ensure waste streams are properly separated. Businesses can be fined if their organic waste stream is contaminated and hence it also becomes a financial risk.</p> |

| | |
|-----------------------|---|
| | <p>Most businesses are driven by cost and hence if there is no economic incentive to separate organic waste from general waste many small businesses would not consider this option, especially considering the greater effort required.</p> <p>Furthermore, organic waste collection diverts waste from landfill and subsequently reduces greenhouse gas emissions, but it is also an economic resource through the production of green electricity (see earthpower for more information) and fertiliser through composting. These benefits of collecting organic waste are often marketed to the community, hence it can cause confusion that it costs more to collect organic waste and implement sustainable initiatives within a business, than allowing waste to go to landfill.</p> |
| Compostable packaging | <p>Recommendation: The EPA:</p> <ol style="list-style-type: none"> 1. regulates the compostable packaging that is being sold as it is a concern that business could be purchasing “compostable” packaging that is not compostable; or 2. makes AS4736 certification more affordable and/or an essential requirement for Australian suppliers of compostable packaging. <p>Background In Sydney organic waste collection companies only accept compostable packaging that conform to the Australian Standard AS4736 (EPA license requirement). The only company that conforms to this standard is BioPak and Vege Ware. However, on the market there are many suppliers that sell “compostable” packaging that do not have this certification. Furthermore, Australian packaging suppliers have indicated that it is expensive to get this certification and that they are unable to afford this for their products, unlike BioPak which is a multinational company and can afford the investment.</p> <p>It is a concern that it is not common knowledge that only compostable packaging with the AS4736 certification can go into an organic waste bin, especially when there are many suppliers on the market that do not have this certification. This means that small businesses may be buying “compostable” packaging as alternates to plastics which are not compostable. This could contaminate organic waste streams and potentially cause pollution with consumers buying and disposing of compostable waste inappropriately when it does not break down.</p> |
| Water pollution | <p>Recommendation The EPA to:</p> <ol style="list-style-type: none"> 1. consider regulating water pollution events from the lack of maintenance of stormwater devices 2. consider being part of MEMA given Initiative 1 is to improve water quality 3. encourage the release of the draft diffuse source water pollution strategy, a commitment in Stage 2 of the MEMA Strategy Implementation (which EPA was identified as a state partner) and identify EPA’s role in diffuse source water pollution management |

4. take a more proactive approach in supporting Councils develop Coastal Management Programs under the NSW Coastal Management Act 2016 many of which seek to improve waterway health outcomes.

Background

Water pollution has been identified as the most important threat to the marine estate. EPA regulates point source water pollution but has not had an active role in diffuse source water pollution or regulating pollution events from the lack of maintenance of stormwater devices, a key leakage of marine litter into our waterways. For the EPA to meet its strategic objective of supporting cleaner waterways, then its responsibilities should be expanded.

Significant amounts of litter and other pollutants are entering waterways because stormwater devices both on private and public land are not being appropriately maintained or have been dismantled (particularly on private properties). Emerging contaminants are also of concern to both and ecosystem health. Urban heat from climate change is only increasing the demand for swim sites in our waterways yet there is a lack of leadership, coordination and capacity building to ensure appropriate catchment management can enable these community aspirations to be delivered.

The SCCG is appreciative of the work of the EPA in supporting the delivery of the Greater Sydney Harbour CMP but encourages a similar role in other CMPs in the Sydney region and building EPA's staff knowledge on CMPs. It would also encourage the EPA to reconsider its role in the development of SMART technology on stormwater devices through the partnership the SCCG and PRCG has established with CSIRO. We believe this work will greatly assist Councils better maintain stormwater devices and undertake targeted litter campaigns with their community. It will also provide important data for the EPA on marine litter. The EPA pulling out of this program was disappointing and we encourage the EPA to reconsider its position.