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Friday, 2 December 2022

NSW Environment Protection Authority
By email to: cds.haveyoursay@epa.nsw.gov.au

Re: Comments on the discussion paper Driving NSW's Circular Economy

Dear NSW Environment Protection Authority,

Thank you for the opportunity to make a submission on the NSW Environment Protection Authority (EPA) discussion paper: [Driving NSW's circular economy](#).

Strategic Alignment

The Sydney Coastal Councils Group (SCCG) is a regional organisation of councils, established in 1989 to promote collaboration among member councils on environmental issues relating to the sustainable management of the urban coastal and estuarine environment. The group comprises nine councils adjacent to Sydney marine and estuarine environments and associated waterways and represents nearly 1.3 million Sydneysiders. We are guided by the SCCG's 2019-2029 Strategic Plan which includes six goals, of which are highly relevant to the discussion paper:

- People and places adapt to a changing climate and future shocks and stressors
- Waterways and the foreshore are protected and healthier
- Marine biodiversity is protected in the bioregion
- The SCCG Region is comprised of sustainable, liveable and 'smart' cities
- There is a collaborative, effective and consistent approach to coastal and estuarine management
- SCCG is trusted and respected to make representations that reflect the values of its members.

Our Comments

The discussion paper sets out the proposed approaches for expansion of the NSW Container Deposit Scheme (the Scheme) as a core mechanism in driving the state's circular economy and achieving the NSW Government's litter targets. The discussion paper also outlines how the Scheme endeavours to minimise its structural, operational and administrative inefficiencies and enhance the Scheme's overall operational experience and transparency for Return and Earn participants.

The SCCG recognises the huge challenge faced by governments, industry and community from the legacy of wasteful use of resources created by society and moving to a circular economy. The proposed expansion of the Scheme outlined in this discussion paper, together with the NSW Waste and Sustainable Materials Strategy 2041 are significant endeavours of NSW Government in this regard. The SCCG acknowledges the importance of incentivising recycling and promoting the continual reuse of waste and resources before they become litter and how this is central to the circular economy.



Sutherland Shire
COUNCIL



INNER WEST



WAVERLEY
COUNCIL



Bayside Council

northern
beaches
council



WILLOUGHBY
CITY COUNCIL
City of Diversity



Randwick City Council
a sense of community



The SCCG has reviewed the discussion paper with input from its member councils and provides the following comments. We have opted to provide a submission by email, addressing certain feedback questions from the survey, where relevant to the SCCG.

Do you support an expansion in scope of containers included in the NSW Scheme? Do you support the proposed containers that would be included in an expanded scope?

- We support an expansion in scope of containers included in the NSW Scheme, and the proposed containers that would be included in an expanded scope. The proposal to remove all exceptions aside from plain milk and health tonic containers is a crucial step for addressing user confusion around what can and cannot be returned.

What factors will need to be considered and addressed to enable a smooth transition to an expanded scheme?

- Having a strong and consistent education campaign will be critical for enabling a smooth transition to an expanded Scheme. This requires coordinated efforts between the NSW Government and Scheme Coordinator to prepare the community, councils, beverage suppliers and Material Recovery Facilities (MRF) operators, amongst other affected stakeholders, for the proposed changes. Activities including social media campaign, community education, workshops and toolkits for each affected stakeholder group should be conducted.
- The inclusion of additional beverage containers in the expanded Scheme is welcomed, although it is unclear how impacts on the current infrastructures will be addressed. The capacity of existing infrastructures to accommodate for the expected increase of container volume needs to be assessed to avoid potential issues of stockpiling and contamination, which already presents a problem in certain areas under the current arrangements.
- Considerations should be given to the flow on impacts of the expanded Scheme on kerbside recycling systems and contracts already in place. Further guidance on these matters for councils and contractors is necessary.
- The success of the Scheme in sustaining high levels of community participation despite the impacts of Covid-19 lockdowns and other external factors is encouraging. However, there was limited discussion in this paper on the barriers that are limiting increased participation beyond the current 90% participation rate on a quarterly basis and the 63% redemption rate. It is imperative that the Scheme further investigates approaches to reduce these barriers, including an audit to reassess the location and geographical spread of collection and distribution points, in order to ensure the ongoing success of the Scheme. The SCCG understands there is a need for smaller and more accessible Return and Earn facilities in built-up urban areas which would expand the opportunities and convenience for depositing containers. There is also an opportunity for smaller facilities to be located in sporting and recreation areas for the benefit of community groups, at the same time improving litter source control.

Do you think the Scheme is achieving the objects of Part 5 of the Waste Avoidance and Resource Recovery Act 2001 (the Act)?

- We agree that the Scheme is meeting the objects of Part 5 of the Act being to (1) recognise the responsibility that the beverage industry shares with the community for reducing and dealing with the waste generated by beverage product packaging, and (2) to establish a cost-effective State-wide container deposit Scheme to assist the beverage industry to discharge that responsibility and to promote the recovery, reuse and recycling of empty beverage containers. We support that the objects of the Act remain valid and appropriate.

I trust that the feedback provided above will be helpful in shaping the expansion of the NSW Container Deposit Scheme.



If you have any queries, please contact me on 0407 733 075 or by email at executiveofficer@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Officer

