



Reference: 008-24 JM

29 April 2024

Department of Planning, Housing and Infrastructure  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150  
By online submission

Dear Sir / Madam

**Re: Submission on the Draft Synthetic Turf in Public Open Space Guidelines for Decision-Makers**

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide a submission to the development of the Synthetic Turf in Public Open Space Guidelines for Decision-Makers.

**Background**

The SCCG is a regional organisation of councils established in 1989 to promote the sustainable management of Sydney's coasts and estuaries through collaboration, capacity building, advocacy, and research. We comprise nine member councils who represent approximately 1.3 million Sydneysiders.

The SCCG notes the Synthetic Turf in Public Open Space Guidelines focus on synthetic turf for sporting purposes and offer strategies and case studies to inform decision-makers. The Guidelines are intended for decision makers, planners and sports field managers who may be considering synthetic turf as an alternative to natural grass and to support designers, delivery agents and open space managers to plan and deliver good outcomes for their community.

We note also that decisions for synthetic turf should consider the five key objectives within the NSW Public Open Space Strategy, including greater social, environmental and economic value.

The draft Guidelines reference the Independent review into the design, use and impacts of synthetic turf in public open spaces and the Office of the NSW Chief Scientist & Engineer (OCSE) being commissioned to provide expert advice on the use of synthetic turf in public open spaces during 2021-22. The SCCG notes that the Guidelines will be informed by the outcomes of the whole-of-government review of the OCSE advice.

**Comments**

After reviewing the draft Guidelines, we are pleased to provide comments and recommendations which the SCCG believes would contribute to the development of the final Guidelines. Comments and recommendations on specific sections are provided in the table following our letter.

Overall, the Guidelines fail to identify current known impacts from shedding of synthetic turf on natural ecosystems and human health, contributing to microplastics that enter waterways and ultimately the marine environment. The SCCG strongly recommends the consideration of natural turf in preference to synthetic turf in all situations.



## Recommendations

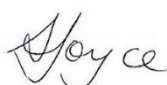
Our recommendations focus on improving environmental considerations in the Guidelines.

1. For existing synthetic turf fields, implement mitigations recommended by AUSMAP<sup>1</sup> as far as possible, including containment and disposal of run-off to mitigate against the impacts of microplastic contaminants on natural ecosystems.
2. Implement an education campaign for councils and sports organisations that informs them of the problems of synthetic turf and impacts of microplastic contaminants on natural ecosystems.
3. Improve the context of the Guidelines with the Synthetic Turf in Public Open Space Study recommendations, regarding the evidence-based research into human health and natural environmental impacts that is needed and include a process of review for the Guidelines to incorporate the outcomes of the research.
4. Expand the Guidelines with a more detailed explanation of the research needed and being undertaken to understand the barriers to implementing natural turf fields and provide context for incorporating research findings.
5. The draft Guidelines should not be finalised until the OCSE findings have been considered to inform the draft Guidelines and that revised draft Guidelines be made available for consultation.

I trust our comments will be considered in finalising the Guidelines. The SCCG looks forward to hearing the outcomes of consultation on the Guidelines and understands that the final document will be published in 2024. We would also appreciate a response in relation to how our comments have been addressed.

If you have any queries, please contact me on 0407 733 075 or at [executiveofficer@sydneycoastalcouncils.com.au](mailto:executiveofficer@sydneycoastalcouncils.com.au).

Yours sincerely



Sarah Joyce  
**Executive Officer**

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<sup>1</sup> [AUSMAP on the Media | Australian Microplastic Assessment Project](#)

No	Doc ref	Comments	Recommendations
1	p.5	Regarding the statement “Concerns include impacts on the local environment...” fails to acknowledge that impacts are not confined to just the local environment but contribute to the microplastic loading that has been detected in waterway sediments and marine foreshores, indicating its ultimate contribution to microplastic impacts on the marine environment; reference the AUSMAP research findings.	Expand the context of impacts on the local environment to include wider impacts on downstream environments and ultimately the marine environment from the contribution of shedding of synthetic turf to microplastic contaminants.
	p.6	The Synthetic Turf in Public Open Space Study recommends further primary, evidence-based research into human health and natural environmental impacts of synthetic turf use. However, there is no further reference to these impacts. There is strong evidence of the impacts of microplastics on natural ecosystems which are contributed to from shedding/degradation of synthetic turf which appears to have been ignored in the Guidelines.	Expand the Guidelines with specific references from the Synthetic Turf in Public Open Space Study to the evidence-based research into human health and natural environmental impacts that is needed and include a process of review for the Guidelines to incorporate the outcomes of research.
	p.6	The Guidelines note that consideration should be given to the potential benefits and impacts of the emerging technologies of Hybrid and 4G synthetic technology within an Australian context and research to understand barriers to implementing natural turf fields. However, there is no specific guidance or context within the Guidelines as to how these can be considered or incorporated.	Expand the guidelines with a more detailed explanation of the research needed and being undertaken to understand the barriers to implementing natural turf fields.
	p.6-7	We would question timing of the draft Guidelines for consultation, given the whole-of-government review of the OCSE advice that is yet to occur and is likely to substantially inform the Guidelines.	Await the outcome of the whole-of-government review of the OCSE advice and provide an updated version of the Guidelines for consultation.
	p.10	The table comparing key differences for designing and managing synthetic turf and natural turf fails to identify a crucial advantage of natural turf over synthetic turf in not creating plastic pollution.	Add an additional row entitled: “Environmental impacts” and include statements about the relative benefits of natural turf over synthetic turf in avoiding impacts of microplastic pollution on local waterways.
	p.13	The end results of using Hybrid turf are concluded with “natural turf ensuring a connection to nature” and the “desire for a green, natural environment” without acknowledging the environmental benefits of natural turf.	Update all references to the use of natural turf to include compatibility with natural systems and the advantage of avoiding contaminants from synthetic turf.
	p.18	Environmental considerations for “Wildlife” fail to acknowledge potential pollution impacts of synthetic turf on natural ecosystems, including aquatic wildlife in local streams.	Include reference to the contribution of synthetic turf shedding to microplastic contaminants and their impacts on natural ecosystems. The “environmental challenge” of disposing of artificial turf should be more fully explained ie. as done in the following section regarding long life and persistence in landfill.
	p.19	The section on Recycling synthetic turf makes good reference to end-of-life and circular economy of the synthetic turf industry. The design of synthetic turf to not break down quickly and stay in landfill for a significant amount of time after disposal is important to acknowledge.	The benefits of avoiding disposal of used synthetic turf in landfill by recycling should be strongly promoted.



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City of Diversity



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a sense of community



WOOLLAHRA  
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No	Doc ref	Comments	Recommendations
	p.34	References to Hybrid and Combination turf appear to be used interchangeably, whereas they are different. Hybrid turf by definition is a system that combines blades of synthetic and natural grass; Combination turf – natural and synthetic turf are used in different areas. The use of Hybrid turf appears to have no advantage over synthetic turf as it impedes the maintenance of natural turf (deep aeration/decompaction).	Revise the Guidelines to ensure references to Hybrid and Combination turf are distinguished by definition. Revise the Guidelines to more fully explain the pros and cons of the using Hybrid turf, given it impedes the maintenance of natural turf.