



Submission to the NSW Department of Planning, Industry and Environment: NSW Plastics Plan

8 May, 2020

Dear Sir/Madam,

Thank you for the opportunity to provide feedback on this Discussion Paper.

SO SHIRE (Sustainable Organisations of the Sutherland Shire) is particularly concerned about the level of waste and litter generated in NSW due to excessive use of single use plastics. Our first focus has been Plastic Free Sutherland Shire, so we welcome the NSW Government proposing to take firm actions to address this. We have submitted the short and long survey via the website, and as an ally of Boomerang Alliance we have also edited their template submission below.

In brief we support:

1. The decision to introduce a ban on lightweight plastic shopping bags (including 'degradable' and 'biodegradable' bags). This ban should be introduced as soon as practical. Heavyweight plastic bags (< 70 microns) (most are used only once) should be included in the ban
2. Introduction of a ban on certain single use plastics such as straws, stirrers, cutlery, coffee cups/lids and food ware (plates, bowls and containers) and helium balloons. This should include oxo-degradable plastics (which cause plastic pollution in the form of microplastics).
3. NSW introducing packaging standards that include honest labelling and making manufacturers responsible for meeting targets; the post-consumer recovery of their products (and including funding for litter collection).
4. The tripling in recycled content in plastics with a minimum 50% in packaging (except where packaging meets required reuse or composting standards).
5. The NSW government investing in resource recovery infrastructure, setting improved standards for recovery services and applying procurement policies that support recycled content.



6. NSW investing in research to examine the extent and impact of plastic pollution on the environment and wildlife and identify new innovative ideas that will avoid or reduce the need for unnecessary and problematic single use plastics.
7. Establishment of a long-term NSW Plastic Pollution Reduction Strategy that takes a continuous improvement approach to single use plastics, involves all sectors and examines the use of plastics in the home, away from home, in agriculture, in business and industry and in the marine environment.

Specific Comments on Cleaning Up our Action Discussion Paper

Reduce plastic waste generation

Proposed target: phase out key single-use plastics

In our clean ups in the Sutherland Shire, most of the debris items we have counted and collected are from land-based sources and are localised litter - either dropped in situ (accidentally or on purpose) or washed or blown from nearby sources such as rivers, parks, streets and drains). Most common items in Sutherland Shire are cigarette butts, foam of various types (packaging and takeaway food), plastic food packaging and remnants (films, chip and biscuit soft packaging, plastic straws, smoothie and juice cups of single and composite materials, coffee cups, takeaway food packaging, lids, nurdles, plastic bags and bag remnants, balloons and balloons remnants including strings and clips, and lots and lots of small broken pieces of plastic. According to Tangaroa Blue Foundation AMDI Database where we log the litter data from the coastal sites we audit (Australian Marine Debris Initiative), 69 per cent of marine debris in NSW comes from plastic sources. Plastic litter is harmful to human health, health of the local environment and flora and fauna, as well as the costs to tourism and the local governments in cleaning up. It also ruins the amenity and lifestyle of enjoying the environs we use for leisure and physical and mental health. Most ocean debris comes from land sources.

Priority direction 1: Harness people power to create a fundamental shift in the way we use plastic

People power is most effective when backing government leadership and good policy. As the recent IPSOS poll shows the people have already spoken:



Three in four (74%) Australians indicate a preference for purchasing products that use as little packaging as possible.....69% of Australians favoured a ban on single-use plastics, and as soon as possible.

IPSOS 'Throwaway World' poll 2019

There are a number of community-based initiatives such as Responsible Cafes and Ocean Friendly Businesses (Surfrider Foundation) and, as referenced in this Discussion Paper, Plastic Free Places (Boomerang Alliance). Our Plastic Free Sutherland Shire certification programs of local schools and businesses has recently received a federal Communities Environment Program grant for our School Litter and Waste Reduction Programs. These are making a difference by encouraging individuals, schools and industry sectors to change practices.

These initiatives create awareness but are most effective when supporting a government phase-out or ban.

Priority direction 2: Set standards for consumer items to design out plastic waste

Packaging should be subject to the targets set in the National Waste Strategy and the position endorsed by all State and Territory Governments (including NSW) that *all packaging must be reusable, compostable or recyclable by 2025*.

Reusable, compostable or recyclable should mean that packaging is reused, composted or recycled in practice and at scale. Definitions need to be clear to avoid greenwashing – for example bioplastics have their place but are not the sole solution.

In our view the NSW Government should introduce mandatory requirements on packaging material, recovery and honest labelling. The Government should also back national efforts to make these requirements consistent through a national Product Stewardship for packaging Scheme, with mandated targets. However, it should not delay action waiting for federal processes.

Priority direction 3: Phase out key single-use plastic items

These are the problem products predominantly used away from home and represent a particular waste and litter problem. We welcome the stated intention in this Discussion Paper that NSW will impose a ban on lightweight plastic shopping bags. Heavyweight plastic



shopping bags (< 70 microns) should be included. This should be introduced as soon as possible.

Three jurisdictions (South Australia, Australian Capital Territory and Queensland) have already announced intentions to phase out certain single-use plastics. These phase-outs include plastic straws, stirrers, cutlery, cups, bowls and plates and include polystyrene and oxo-degradable food ware. NSW should follow this example and phase out these items and include other problem plastic items such as condiment sachets/containers, balloon sticks, plastic cotton buds and barrier bags, **microbeads and balloon releases**.

All of these items can either be avoided or have preferred alternatives. These alternatives include expanding reusable food ware options for away from home takeaway services (the best option) or switching to non-plastic items (e.g. paper straws, wooden cutlery, sugarcane/palm frond plates and bowls). The Australian compost standard (AS 4736/AS 5810) could be applied as a last resort, where products do not currently have a preferred non-plastic alternative.

We note that NSW has had a ban on the deliberate release of more than 19 helium balloons since 1999. This ban is not policed and has not stopped the practice. Resources should be made available to properly police this. We propose that the NSW Government take the important step to ban the release of balloons, ban the use of helium to inflate balloons, and phase out mylar balloons and balloon sticks. Whether they are intentionally released or not, helium balloons pose a significant environmental threat. An interim measure could be to require warnings on balloon packaging and helium tanks. There have been two major balloon releases this week in NSW alone of over 50 balloons in each instance. We pick up balloon remnants every week of local Cronulla beaches.

The most littered items, cigarette butts, are plastic and urgently need to be addressed as well.

Making the most of our plastic resources

Proposed target: Triple the proportion of plastic recycled in NSW across all sectors and streams by 2030

It is important to note that avoiding, reducing and composting are also part of the targeted solutions to addressing single-use plastics. Recycling is essential but only for the products that cannot be avoided, reduced, reused or composted.



Priority direction 4: Make producers of plastic items more responsible for collecting and recycling in NSW

The global Plastic Pact (Ellen Macarthur Foundation), that the Australian Packaging Covenant Organisation has committed to join, backs this position, stating:

‘Businesses producing and/or selling packaging have a responsibility beyond the design and use of their packaging, which includes contributing towards it being collected, reused, recycled or composted.’

‘Governments are essential in setting up effective collection infrastructure, facilitating the establishment of related self-sustaining funding mechanisms and providing an enabling regulatory and policy landscape.’

Priority direction 5: Mandate 30% minimum recycled content in all plastic packaging in NSW by 2025

APCO has recently set a target of 50% minimum recycled content in packaging by 2025.

NSW should aim higher than 30% minimum recycled content - to at least 50%.

Priority direction 6: Support demand and industry capacity

In our view the NSW Government should introduce mandatory requirements on packaging recovery and honest labelling. The Government should also back national efforts to make these requirements consistent. The most effective approach to address packaging and to meet the 2025 targets is to have an effective EPR or Product Stewardship (PS) Scheme for Packaging. Such a scheme must include mandatory recovery targets. Government cannot rely on co-regulatory or voluntary schemes such as the current arrangements with APCO. These arrangements have been in place for over 20 years. In 1999 plastic packaging recovery was 20% (APC), and in 2019 it was 16% (APCO).

Our organisation endorses Boomerang Alliance’s position on product stewardship and labelling, calls for a PS Scheme for Packaging with mandated targets and requirements on labelling that ensure products are recovered, in practice, as opposed to aspirational targets.

Reducing plastic waste leakage

Proposed target: reduce plastic litter items by 25% by 2025



Priority direction 7: Use extended producer responsibility schemes to fund litter collection and end-of-life plastic management

Extending the scope of PS schemes to include litter collection makes sense. This paper estimates that it costs governments in NSW over \$167 m per year for litter clean up. Plastic litter from packaging forms a significant proportion of this.

Priority direction 8: Invest in infrastructure that can better manage plastic before it causes harm

Coupled with a PS Scheme for Packaging, effective investment will assist industry to collect and recover any used plastics. Many recycling MRFs are out of date, many regions do not have adequate commercial or community composting facilities, and across NSW LGAs have different collection services (largely based upon the capacity of their local MRF). Introducing government procurement policies for recycled content and mandating recycled content requirements for major civil works will create a market for recycled plastics.

Improve our understanding of the future of plastics

Proposed target: Make NSW a leader in national and international research on plastics

This can be set in the context of having a long-term NSW Plastic Pollution Reduction Strategy that examines the use of all single-use plastics by all sectors and includes plastics in the home, away from home, in agriculture, in business and industry and in the marine environment.

Priority direction 9: Set up a NSW plastics research network by 2021

There is a lack of information on the source, extent and impact of plastic pollution on wildlife, the environment and human health (particularly when microplastics enter the human food chain). This must be urgently investigated. As reported in the New Plastics Economy Report 2016:

'At least 8 million tonnes of plastic leak into the ocean every year. By 2025 the oceans will contain one tonne of plastic for every three tonnes of fish and by 2050 more plastic than fish'



Priority direction 10: Support commercialisation of research-driven plastics solutions

Whilst global innovation in avoiding, reducing or developing alternative solutions to single-use plastics is proceeding, very little seems to be done in Australia. The NSW Government should take a leadership role on this and create a reputation for excellence in this area and develop new business opportunities based up eliminating unnecessary single-use plastics.

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Have Your Say DPIE Plastics – Detailed Survey

1. Are you concerned about how much plastic we use in NSW?

Yes

If 'Yes' what are you concerned about?

Risks to human health from plastic; Environmental impacts of plastic pollution and leakage; Impacts on our oceans and marine life; Impacts on our soils and wildlife; Resource use and greenhouse gas emissions; Limited reuse and recycling options for plastic; Litter detracting from amenity

If 'No' or 'Unsure' please tell us why

2. Do you support NSW Government action on specific plastics to protect human health and our environment?

Yes

If you want to, please tell us why

Many people do not realise the direct and indirect links on the affects on human health with the use of certain plastics and from plastic pollution in our environments that we use for leisure, food and other resources (such as the water we drink, the soil we grow crops in, the food fed or grazed on by animals we eat, the ocean we swim etc). Microplastics and plastic associated toxins have been found in table salt, beer, agricultural soils, in freshwater systems, our oceans, our coastal sediments and even in the air! These come from plastic litter and pollution such as from microfibres from clothing from washing machines, degrading plastic debris in the oceans, rivers and land based sources including sewer systems and street drains, Nurdle spills and also from microplastics PURPOSEFULLY added into beauty products in the form of microbeads or plastic ingredients . Please BAN MICROBEADS and plastic ingredients in ALL BEAUTY and personal use products NOW!

Outcome 1: Reduce plastic waste generation

Proposed target: Phase out key single-use plastics in NSW

The best way to reduce plastic waste is to eliminate it at the point of generation. Avoiding plastic is the best way to protect our environment and human health. Members of the community, government and business can all work together to reduce the amount of plastic we generate.

3. Do you support the proposed target to phase out key single-use plastics in NSW?

Yes

If you want to, please tell us why

The key single-use plastics listed in the discussion paper all have non-plastic alternatives and reduce and reuse solutions. These targeted single use plastic items are found in great numbers as litter, and besides the health affects to humans and pollution of our natural environs, their production is a waste of petrochemical resource (which should be used for necessary and where there is no other eco-alternative). The emissions from production is such a wasteful use of petrochemicals, and these items do not need to be made to last for decades when they are usually only needed for minutes. Other target streams should be plastic glitter and confetti, all balloon releases (it is literally littering, we do not understand how even one is allowed to be released as we pick up 5 balloons everyday at our local beach), plastic single use condiment packaging such as sachets, containers, sushi fish and items that have complex packaging that stops the item from being collected, disposed of or recycled easily (such as lids need to be of the same material as the bottle and attached to the bottle).

Priority direction 1: Harness people power to create a fundamental shift in the way we use plastic

4. Do you support using less plastic?

Yes

If you want to, please tell us why

By using less plastic , I have used less resources and emissions , I have created less waste in general and reduced my landfill footprint by 75%, saved money in the longterm by choosing reusable alternatives and lifestyle choices, and my lifestyle is healthier.

My favourite place for leisure, fitness and mental wellbeing is the ocean, beach, parks of my local area, and these are being trashed by local litter and toxins from plastic production and use. NSW and Australia can affect world change on use of plastics by being a leader and role model.

By avoiding single use plastic , it develops a lifestyle of avoiding single use waste in general. which is good for my health, good for my wallet and good for my planet.

5. Is it hard to use less plastic?

No

If you want to, please tell us why

Once you do your own personal research for your own lifestyle - what you use, need, where you eat , shop etc it is easy to incorporate reusable choices and non-single use plastics alternatives . and once you find out about some health issues of using certain plastics ,. you never ever use them again! I still live a "convenient" lifestyle , but have swapped my choices for more sustainable options. And in 2020 there are many alternatives and solutions for businesses to incorporate sustainable options in their operations.

Two things make it hard for the general public - availability and affordability. At the moment, there is little incentive for local businesses to NOT use wasteful and polluting single use plastic - unless explained of the economic benefits and educated on the possible more eco-options. Creating plastic waste is too cheap - plastic and its pollution is not valued appropriately. Businesses are time poor to do their own research and worried about their bottom line, and we are relying on support from the public to support them when they choose to be more sustainable. This choice is usually a personal moral decision by the business owner.

Legislation and enforcement of bans on wasteful, single use plastics will support and drive the market for non-single-use-plastic alternatives, making options more abundant and available - a variety to choose from and easy to access, as well as

making reusable and compostable options more economical for the user and producer. It will also support research and development into better materials and collection for reuse or recycling - supporting circular economy.

6. How can government make it easier to use less plastic?

Set up plastic-free precincts (areas where businesses and organisations work towards being single-use plastic free); Support reusable packaging initiatives; Develop infrastructure to help people avoid plastic (like drinking fountains to reduce use of single-use plastic water bottles); Encourage people to make good choices when they think about using or buying plastic; Incentivise not using plastic and education to avoid GREENWASHING

7. How can businesses make it easier to use less plastic?

Become part of a plastic-free precinct; Engage in reusable packaging initiatives; Avoid making or using plastic where possible; Avoid giving plastic away for free; Use other materials, instead of plastic, where appropriate; engage and encourage customers to follow these changes

Priority direction 2: Set design standards for plastic consumer items

Consistent, mandated product design standards for certain plastic items would help reduce problematic and unnecessary plastics that can harm the environment and help increase the use of recyclable materials. By designing out plastic waste, we can reduce the amount of plastic that is littered or landfilled. This can create a shift towards durable and reusable materials and increase the proportion of plastic that is recycled and remanufactured.

8. Do you support government introducing mandatory design standards for certain plastic products?

Yes

If 'Yes' what products or materials should have mandatory design standards?

Washing machines with microfibre filters as mandatory for all new machines.

Beauty products - no microbeads or plastics as ingredients including toothpaste
White good and electronics - not only product stewardship and right to repair (ending planned obsolescence) of the product but packaging must be recyclable

and ACTUALLY recycled - avoiding polystyrene where possible by choosing alternative reusable/recyclable/compostable and collection system for polystyrene packaging.

Composite packaging must be easily separated or salvaged for recycling - at the moment either the plastic or the paper or the metal is being recycled not all.

Any single use plastic packaging must be easily recycled i.e materials the same where possible (at the moment a bottle of water has minimum three types of plastic) and designed to avoid loss of parts of packaging - lids that connected to the bottle etc

Food packaging - safe, no polystyrene , reusable/recyclable/home compostable.
No single use plastic if there are safer, eco alternatives

If 'Yes' what mandatory design standards would significantly reduce plastic waste generation?

All packaging and products must have a circular system - either reused, recycled or composted. If the packaging /product does not have an end of life solution besides landfill - it must be redesigned as waste and pollution at end of life of products must be reflected in the true cost of the product.

Choosing easily and broadly recyclable plastic - for example black plastic is hard to capture in many recycling management systems and what black plastic can be recycled into is limited (i.e. clear and white plastic is favourable)

Avoidance of loose parts design and items should be made out one type of material/ plastic where possible.

Incentives for natural fibres in fashion industry and mandatory filters for washing machines.

Materials should follow the hierarchy - reduction and minimal packaging, and be reusable, recyclable, biodegradable and home compostable.

BAN NOW all microbeads and plastics in beauty products and consumer items including toothpaste. Microbeads are unnecessary.

Alternatives to polystyrene - and if polystyrene is the only option then collection and recycling system mandated.

All materials of the composite must be easily recycled eg lids easily separated, reused, recycled and compostable, plastic and paper salvaged.

If 'No' or 'Unsure' please tell us why

Priority direction 3: Phase out key single-use plastic items

The best way to reduce plastic waste is to avoid making it in the first place. By phasing out plastics we don't need or that cause problems, we can save resources and reduce risks to the environment and our health. However, our community has diverse needs and plastics that are unnecessary to some may be essential to others. All phase outs will consider exemptions to meet specific community needs.

9. Do you support the phase out of lightweight plastic bags (less than 35 microns and including 'degradable' and 'compostable' plastics)

Yes - Near term

If you want to, please tell us why

Yes - there are plenty of reusable options and compostable single use non-plastic alternatives.

These lightweight bags do not last very long so cannot be reused appropriately and pose horrible threats to wildlife as a pollution item.

10. Do you support the phase out of heavier/boutique plastic bags?

Yes - Near term

If you want to, please tell us why

Yes . Many of these are not being recycled , nor being reused.

11. Do you support the phase out of plastic straws?

Yes - Near term

If you want to, please tell us why

Yes. There are plenty of single use compostable options such as paper and bamboo

and pasta and rice straws, and plenty of reusable options such as metal.

12. Do you support the phase out of disposable plastic plates and bowls?

Yes - Near term

If you want to, please tell us why

Yes. There are still plenty of "convenient" disposable options that can be composted such as paper and plant fibre alternatives.

And reusable systems for events are available on the market.

13. Do you support the phase out of disposable plastic cutlery?

Yes - Near term

If you want to, please tell us why

Yes. These are handed out even when not needed - at times wrapped in plastic too. Used for a few minutes and lasting over decades in the environment . Plenty of reusable options and also compostable single use alternatives for food takeaway services .

14. Do you support the phase out of disposable plastic stirrers?

Yes - Near term

If you want to, please tell us why

Yes. Used for a few minutes and lasting over decades in the environment . Plenty of reusable options and also compostable single use alternatives for food takeaway services .

15. Do you support the phase out of disposable plastic cups?

Yes - Near term

If you want to, please tell us why

Yes. Used for a few minutes and lasting over decades in the environment . Plenty of reusable options including return and swap systems and also compostable single use alternatives for food takeaway services .

16. Do you support the phase out of expanded polystyrene food and beverage containers?

Yes - Near term

If you want to, please tell us why

Expanded polystyrene food and beverage packaging must be banned NOW. It cannot be recycled due to food contamination, breaks into small bits of plastic and high temperatures is not safe to consume from.

After plastic pieces and cigarette butt filters, foam is the third highest item we find in clean ups, and in certain areas we find bags of polystyrene broken up and it is too hard to rescue from the environment.

17. Do you support the phase out of all oxo-degradable plastics (a type of plastic that can break up into microplastics faster and may cause other environmental harm)?

Yes - Near term

If you want to, please tell us why

oxo-degradable is greenwashing . It is not a solution to our petrochemical plastic use. Additives are added to the conventional plastic to speed up degradation in sunlight, so that the large plastic item breaks up into smaller plastic polymer pieces but this does not mean the plastic breaks down "biodegrades". "Degradation" is not the same as "biodegradation". Microplastics are huge issue, for example more surface area to absorb and adsorb toxins , and also the size that can enter the food chain from the lower trophic levels (think bioaccumulation and biomagnification issues) turning the macro plastic problem into a micro plastic problem.

18. Are there other plastics that should be phased out?

Plastic single use condiment containers and sachets, glitter and plastic confetti, release of ANY Balloons (mylar and rubber including the insidious bunch o' balloons), cotton tips (q tips), single use cable ties, plastic learner and p-plates, plastic parking tickets and fines (registration can be recorded and entered electronically and digitally), plastic cigarette filters; single use fruit stickers

19. What should the NSW Government consider when implementing these phase outs?

Phase out Time limits for public and businesses to adapt;

Education of alternatives and why certain plastics are being phased out;
Addressing stockpiles of already purchased goods (collections and recycling, or use); Clear definitions of alternatives to avoid greenwashing;
Enforcement of bans/manates;
Identifying, and supporting the market of plastic-free alternatives;
Food safety; hygiene regulations; allowances for medical institutions and disability inclusion
Increased market and availability of compostable and efficient recycling services in NSW council areas - there is broad range and confusion currently.

Outcome 2: Make the most of our plastic resources

Proposed target: Triple the proportion of plastic recycled in NSW across all sectors and streams by 2030

When plastic reaches end-of-life it's important we recycle as much of it as we can and use that plastic to make new products or materials. This reduces the amount of new plastic we generate, preserves valuable resources in our economy for longer, reduces greenhouse gas emissions and prevents plastic entering our environment.

20. Do you support the target to triple the proportion of plastic we recycle in NSW across all sectors and streams by 2030?

Yes

If you want to, please tell us why

As it is only 10 per cent currently, any increase is supported, and should be at the APCO target minimum. To do this, efficient and scaling up of the recycling infrastructure and technology in NSW (and national links) and product stewardship must be incentivised. Plastic that is not being recycled is literally a resource being wasted - wasted material, wasted energy, wasted money. Localised and regional grants to support innovative businesses, industry leaders and community organisations with initiatives working towards realising this outcome. We need to support the ability to increase recycling by making it easier TO recycle for

businesses and individuals, as well as supporting a market for recycled plastic. When plastic packaging is necessary, recycled plastic should be the material used if healthy and safe to do so - this includes avoiding using recycled plastic in areas that will break down to micro plastics.

Priority direction 4: Make producers of plastic items more responsible for collecting and recycling in NSW

Under extended producer responsibility schemes or product stewardship schemes producers bear greater responsibility for the products they make. These schemes can involve shared responsibility across a product lifecycle, from extraction.

21. Do you support schemes where producers take greater responsibility for the plastics they generate?

Yes

If you want to, please tell us why

It needs to be mandated, as a consistent policy with time mandates will force producers (big and small) to ACT now, under necessity. Some producers are making starts, but NSW (and Australia) are generating more and more plastic every month. With the invention of suitable sustainable alternatives, many producers cannot (because of cost) or will not choose these alternatives, and instead we see instead of a reduction of packaging, each week an item has EVEN MORE LAYERS of packaging. We need schemes that create incentives for producers to factor the total cost of their product and packaging to embrace circular economies and product stewardship. It must be made more acceptable and financially influenced to transition from cheap conventional plastic to swap to sustainable, reusable or compostable alternatives. Producers make money from the sale of the product, therefore the true cost of the recovery of the packaging (pollution, recycling etc) must be reflected in their operations. If mandated to incorporate the cost for their product's recovery and end of life, they will be motivated to be innovative and develop more recyclable, reusable, compostable systems. This will change how we "value" of plastic.

22. What plastic items or materials could be considered for such schemes?

Consumables and grocery items (bottles, packets etc) - there reusable and recycling containers schemes

White goods and electrical goods - including foam packaging

23. Are there challenges with such schemes?

Yes

If you want to, please tell us why

conventional plastic is too cheap , and we have to change the current perception that landfill is a solution. There is no away , and we will be left dealing with our landfill use and associated tissues for centuries.

If 'Unsure' please tell us why

24. What are the other ways the NSW Government could support producers to be more responsible for the plastic they generate?

Provide clear, researched and government approved definitions on the terms and types of materials, packaging and reusable/returnable/recycling/composting services approved

If mandated to incorporate the cost for their product's recovery and end of life , they will be motivated to be innovative and develop or support more reduction in packaging and choose recyclable , reusable , compostable systems.

Identifying existing, and supporting research and development of a market of cost effective sustainable alternatives and solutions to each type of plastic.

Localised and regional grants to support innovative businesses, industry leaders and community organisations with initiatives working towards realising this outcome.

Priority direction 5: Mandate 30% minimum recycled content in plastic packaging in NSW by 2025

Requiring that recycled content is used in new plastic provides an end market for recycled plastic and can help us triple our recycling rate.

25. Do you support a requirement for all new plastic packaging to contain at least 30% recycled plastic content by 2025?

Unsure

If you want to, please tell us why

I think the target should be higher as we need to support a market for recycled plastic - plastic that is not reused is a wasted resource, and recycling generally produces less emissions than sourcing from raw materials.

However in regards "all new plastic packaging" - where safe and hygienic to do so, recycled plastic must be used for instances where plastic packaging is necessary, however non-plastic packaging should be the first choice. Bioplastics (the ones that are biodegradable /compostable) may also be better choices for certain items.

Will these 'new' packaging made out of recycled plastic be covered under an extended producer responsibility scheme ?

We want to focus on using LESS plastic and do not want the idea of recycling plastic to be the stop gap solution that delays and detracts from reducing packaging in general and the focus on reusable and compostable solutions.

how will this requirement apply imported products ?

26. Do you support all new plastic items to be made with recycled plastic?

Unsure

If you want to, please tell us why

In regards "all new plastic items" - where safe and hygienic to do so, recycled plastic must be used for instances where plastic is necessary, however non-plastic packaging should be the first choice if possible. Bioplastics (the ones that are biodegradable /compostable) may also be better choices for certain items.

Will these 'new' products made out of recycled plastic be covered under an extended producer responsibility scheme?

How will this requirement apply imported products ?

We want to focus on using LESS plastic and do not want the idea of recycling plastic to be the stop gap solution that delays and detracts from reducing packaging in general and the focus on reusable and compostable solutions.

27. Would a requirement to use recycled plastic drive demand for recycled content?

Yes

If you want to, please tell us why

It will be an incentive for producers to move away from raw materials , however we want the focus to not be recycled plastic being the core goal - we want to focus on using LESS plastic and do not want the idea of recycling plastic to be the stop gap solution that delays and detracts from reducing packaging in general and the focus on reusable and compostable solutions.

Will these 'new' products made out of recycled plastic be covered under an extended producer responsibility scheme

Recycling is important but the solution to the underlying problem that we create too much that has to be discarded. We need to prevent the manufacturing of non-reusable "stuff".

28. Are there barriers to creating a reliable supply of locally recycled materials for reprocessing?

Yes

If 'Yes' what are the barriers and how could they be overcome?

Sorting of type of plastic - better recycling infrastructure and technology (collecting from public spaces, businesses and domestic, then the sorting, cleaning, processing)

Contamination - better education , better cleaning in sorting , advanced technology that can deal with contamination

Colour - black plastic can be reprocessed but not favourable with limited colour use

Pseudo-solution -Avoiding the need to rely on plastic as the solution - if products can be made NOT out of PLASTIC , then they should not be made out of recycled plastic. We want producers to move away from raw materials , however we want the focus to not be recycled plastic being the core goal - we want to focus on using LESS materials and LESS plastic and do not want the idea of recycling plastic to be the stop gap solution that delays and detracts from reducing packaging in general and the focus on reusable and compostable solutions.

Priority direction 6: Support demand and industry capacity

The NSW Government can play an important role in stimulating demand for recycled content by increasing the safe use of recycled plastic in government procurement projects. The plastic recycling sector can also be stimulated by government investment.

29. How can NSW Government procurement best encourage increased use of recycled plastic?

Investing in appropriate plastics to eliminate contaminated and inefficient streams- whether that be only clear or white plastic being used to assist in recycling value

Advising on the appropriate use and what types of plastic are best for recycling and investing in research on appropriate end of life solutions for plastics that cannot be recycled over and over - plastics have a limit to how much they can be recycled into other products.

Incentivise and invest in innovative research and product development - especially for those minimising their packaging design - quality over quantity

Financially supporting the industry and businesses to develop recovery and recycle programs for hard to recycle but good quality plastic items such as bottle lids and foam (see next question), and products that made from these recycled materials.

30. What type of funding would encourage investment in the plastics recycling sector?

Direct grants

31. What type of projects could be funded to increase plastic recycling?

One type of project is making polystyrene recycling easier and influencing producers to start to reduce the amount and invest in alternative packaging. In my local area for example, there is no place to collect, drop off or recycle polystyrene packaging from electrical, furniture and white good deliveries. So nearly all polystyrene in Sutherland Shire goes to landfill. A few councils nearby offer free foam recycling for their residents, but we have to drive 1.5 hours to a place and pay a business to recycle it for us, and they then send the product to places such as South Korea. Some local businesses have worked out it is actually cheaper for them to personally drive and drop off bags of polystyrene and pay that recycling fee per

metre cube, then pay for the same space of landfill waste bins . A better recovery and recycling system needs to be developed and we need an end to end project from producers to user to recycler back to producer - the consumer businesses that sell the polystyrene need to be funded to offer to recover and recycle the foam packaging either at their stores or at a combined collection depot where consumers can drop off for free and businesses can pay a small fee; or use the funds to cover the difference in cost of purchasing the recycled product needs a market here in Australia.

Outcome 3: Reduce plastic waste leakage

Proposed target: Reduce plastic litter by 25% by item by 2025

One of the major sources of plastic entering our environment is litter. The NSW Government has already delivered highly successful litter reduction programs, including the container deposit scheme, Return and Earn, and the \$50 million litter prevention program. However, we can still do more to protect our environment from plastic litter.

32. Do you support the target to reduce plastic litter by 25% by 2025?

Yes

If you want to, please tell us why

Yes , the target should be higher as plastic products and packaging are the most littered items in NSW. In our clean ups in Sutherland Shire, most of the debris items we have counted and collected are from land based sources and are localised litter - either dropped in situ (accidentally or on purpose) or washed or blown from nearby sources such as rivers, parks, streets and drains). Most common items in Sutherland Shire are cigarette butts, foam of various types (packaging and takeaway food), plastic food packaging and remnants (films, chip and biscuit soft packaging, plastic straws, smoothie and juice cups of single and composite materials, coffee cups, takeaway food packaging, lids, nurdles, plastic bags and bag remnants, balloons and balloons remnants including strings and clips, and lots

and lots of small broken pieces of plastic. According to Tangaroa Blue Foundation AMDI Database where we log the litter data from the coastal sites we audit (Australian Marine Debris Initiative), 69 per cent of marine debris in NSW comes from plastic sources.

Plastic litter is harmful to human health, health of the local environment and flora and fauna , as well as the costs to tourism and the local governments in cleaning up. It also ruins the amenity and lifestyle of enjoying the environs we use for leisure and physical and mental health. Most ocean debris comes from land sources.

Priority direction 7: Use extended producer responsibility schemes to fund litter collection and end-of-life plastic management

Some plastics are hard to collect because of their sheer number or the way they are used and disposed. Cigarette butts (which are made from plastic) are the most littered item in NSW. They are very difficult to collect, are easily washed into our waterways and carry potentially toxic chemicals. Fishing gear is often lost or abandoned in waterways or in the ocean and causes significant injury or death to our marine wildlife. A CSIRO study found 8,000 pieces of lost fishing gear floating in the ocean killed up to 14,600 turtles in one year. Government can work with businesses (producers of plastic and plastic waste) to develop extended producer responsibility schemes, enabling them to take more responsibility for protecting our health and environment from plastic litter like cigarette butts and fishing gear.

33. Do you support schemes that enable producers to be more responsible for the collection and management of plastic items like cigarette butts and fishing gear?

No

If you want to, please tell us why

They produce it, make money from designing and selling the product, they need to be part of the solution to stop their product littering and polluting

If they are involved in the collection, recovery and management of their plastic product at its "end of life" they will be encouraged and incentivised to redesign problem polluting and hard to recycle items , and also be apart of the broader education of their consumers on how to manage the waste they are creating.

Priority direction 8: Invest in infrastructure that can better manage plastic before it causes harm

Plastic enters our environment from many sources, not just litter. Microplastics in our biosolids, spillage of plastic pellets, dumping of plastic waste and many other sources all leak plastic into our environment. Appropriate management of end-of-life plastic can help reduce plastic leakage. Infrastructure, such as improved waste water treatment technology, can help capture plastic before it enters our environment and our oceans.

34. Do you support the NSW Government investing in infrastructure to prevent plastic leaking into the environment?

Yes

If you want to, please tell us why

Yes definitely ! We need to stop plastic leaking into our environments, not just for the health of the flora and fauna, but for our own health.

One program NSW government should look at is the Operation Clean Sweep program that reduces the loss of plastic resin pellets, flake and powder from industry and has the support of Chemistry Australia. Another program is Strain the Drains.

Filters on washing machines for microfibres , but as that would not stop nanoplastics we need to invest in more technology and also work with the fashion industry.

Water treatment - stopping cotton tips !

35. What infrastructure or processes would most effectively prevent plastic leakage?

Improved waste water treatment infrastructure to reduce microplastics entering our oceans and being spread on soil in bio solids; Mandated sweeping practices at plastic manufacturing facilities to prevent plastic pellets escaping into the environment; Improved drinking water filtration to remove microplastics from our drinking water; Improved stormwater and pollutant traps to prevent plastic litter entering our waterways.

Outcome 4: Improve our understanding of the future of plastics

Proposed target: Make NSW a leader in national and international research on plastics

Despite plastic being widespread in modern society, research into the long-term effects of plastic on the natural environment and human health, and the best ways to reduce these impacts, is still emerging, or on some topics still relatively young. Supporting research on plastics and the best way to reduce the impact of plastics can help NSW become a leader in this space.

36. Do you support the proposed target to make NSW a leader in national and international research on plastics?

Yes

If you want to, please tell us why

In NSW we have a wealth of industry, business and scientific experts of their field, who understand the importance of the health of the environment, the health of humans, and the health of the economy and how they all will depend on how we progress into the future and start valuing and using plastics responsibly. This is the time for innovation, informed consumer behaviour and choices comes from researched and well-advised markets.

Priority direction 9: Set up a NSW plastics research network by 2021

There are still many gaps in our knowledge and unknown opportunities to improve how we use and manage plastic. Setting up a NSW Plastic Research Network will bring together research institutions, industry, government and other organisations along the plastic value chain to generate innovative solutions and create opportunities for NSW.

37. Do you support the establishment of a NSW Plastic Research Network?

Yes

If you want to, please tell us why

There is a huge brains trust here in NSW and many scientists, institutions and organisations working on projects that research the source and effects of our use of plastics , and on alternative solutions and services to the use of plastic. We need to find out who, what they know and collaborate to work on gaps in our knowledge , avoid wasting time and resources independently working on the same tasks, and create opportunities for a future where we use plastics responsibly. Plastic is an amazing invention, but how we have been using it has been detrimental to our progress. The health of our environment, our personal health and wellbeing and health the economy are all intertwined.

Priority direction 10: Support commercialisation of research-driven plastics solutions

By backing NSW research and development in plastics, we also have an opportunity to create new industries and jobs. The Government can help support researchers commercialising their technologies. By becoming a leader in plastics research, NSW can better understand how to tackle the plastics problem and export this knowledge. Not only does this approach make research and development more sustainable it also sets NSW up as an attractive hub for international investment.

38. Do you support the NSW Government funding the commercialisation of research-driven plastics solutions?

Yes

If you want to, please tell us why

39. Do you need support from government to commercialise a viable plastics management solution and bring it to market?

Yes

If you want to, please tell us why

One type of project is making polystyrene recycling easier and influencing producers to start to reduce the amount and invest in alternative packaging. In my local area for example, there is no place to collect, drop off or recycle polystyrene packaging from electrical, furniture and white good deliveries. So nearly all polystyrene in Sutherland Shire goes to landfill. A few councils nearby offer free foam recycling for their residents, but we have to drive 1.5 hours to a place and pay a business to recycle it for us, and they then send the product to places such as South Korea. Some local businesses have worked out it is actually cheaper for them to personally drive and drop off bags of polystyrene and pay that recycling fee per metre cube, then pay for the same space of landfill waste bins . A better recovery and recycling system needs to be developed and we need an end to end project from producers to user to recycler back to producer - the consumer businesses that sell the polystyrene need to be funded to offer to recover and recycle the foam packaging either at their stores or at a combined collection depot where consumers can drop off for free and businesses can pay a small fee; or use the funds to cover the difference in cost of purchasing the recycled product needs a market here in Australia.

40. What is the most important action the NSW Government can take to minimise the impact of plastics and why do you think this?

Policy changes that ban single use plastics that are unnecessary, litter problems and those that have more sustainable alternatives.

Increase the education of the public and businesses of the need of these bans and of the true eco-alternatives to avoid greenwashing

Increase legislation and enforcement against littering and plastic use

Regulations on packaging to ensure they are recovered to be recycled .

Fund more research on the extent, source and impact of plastics on habitats, wildlife and human health.

BAN microbeads !

BAN ALL BALLOON RELEASES.

Support the industries that are manufacturing and recycling more sustainable alternatives and systems ; develop state and national recycling network that is more efficient and less confusing - some places black plastic can be recycled , some places it can't, there are different rules for recycling lids etc

About you

Email

info@soshire.org

Are you making this submission as an individual or an organisation?

Organisation

Organisation name

Sustainable Organisations of the Sutherland Shire (SO SHIRE)

Organisation type

Charity or community organisation