

Draft Submission to the NSW Litter Prevention Strategy 2017-20

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Opening

Local Government NSW (LGNSW) welcomes the opportunity to respond to the state's first NSW Litter Prevention Strategy (the Strategy). LGNSW is the peak body for local government in NSW, representing NSW general-purpose councils and associate members including special-purpose county councils. LGNSW facilitates the development of an effective community based system of local government in the State.

As a major land manager and point of contact with the community, NSW councils work tirelessly on the expensive and resource-intensive exercise of tackling litter. Councils carry out this work to provide a clean and safe environment for the community.

In developing this response, LGNSW sought feedback from NSW councils and regional waste groups. LGNSW would like to acknowledge the effort NSW Environment Protection Authority (EPA) staff have taken to seek feedback on this Strategy, especially via workshops, the online survey and follow up reminders.

Please note that to meet the consultation timeframe this submission is provided in draft form in anticipation of LGNSW Board approval. LGNSW will advise the NSW EPA of any amendments to the submission at that time.

Response

Councils appreciate the collaborative effort the EPA has taken to address litter, both through this Strategy and EPA actions to date. The imminent Container Deposit Scheme, the Hey Tossler! campaign, litter grants, reporting litter from vehicles, EPA litter library and strategic litter partnerships are all of noteworthy mention.

Overall councils have said that the Strategy is a good one. This response is structured to follow the 'approaches' as established in the Strategy.

Approach 1: Rewarding responsible behaviour

The introduction of the NSW Container Deposit Scheme (CDS) is a major undertaking which is likely to see significant litter reduction and increased recycling across the state. LGNSW commends the EPA for delivering this important and incredibly complex piece of work.

LGNSW has provided and continues to provide extensive detailed feedback to the EPA about the development of CDS in NSW. As such, this submission does not include specific feedback about the Scheme. Through consultation on this Strategy however, councils have indicated that they are keenly awaiting communications about the rollout of CDS.

Plastic bag litter is significant and can result in serious environmental impacts, especially when ingested by wildlife. Local government supports the phasing out of plastic bags. The fact box on page 11 of the Strategy states that the EPA will "lead on developing national solutions to single use plastic bags". It is noted however that this action is not included in the Strategy action table. Although a national approach is desirable, the history of CDS indicates that a state-by-state approach may be more achievable. Recent commitments by key retailers to phase out plastic bags indicate that industry supports such moves.

Councils encourage the EPA to work on other Extended Producer Responsibility or regulatory changes to reduce litter. Bold actions to reduce commonly littered items such as takeaway containers, print and advertising litter and cigarettes are supported.

Print and advertising material is worthy of mention as it generates significant amounts of preventable waste and litter. Although legislation exists to prevent this litter from occurring, councils struggle to undertake enforcement in this area. Councils would welcome EPA support to address this type of litter.

Recommendations:

1. Commence 'education on container deposit' as soon as possible.
2. Include "lead on developing national solutions to single use plastic bags" in the Strategy action table.
3. Consider a state-based phasing out of single use plastic bags.
4. Consider regulatory action to reduce litter of other commonly littered items.
5. Investigate additional measures to prevent print and advertising litter.

Approach 2: Education and awareness

Education and awareness are key to successfully preventing litter in NSW. The Hey Tosser! campaign has been well-received by many councils, and councils have noted that the flexibility to tailor the campaign locally made local buy-in more straightforward. It is understood that a refresh of Hey Tosser! is planned. Councils would like the opportunity to contribute to the development of the campaign collateral.

The litter library provided by the EPA is a fantastic resource especially for councils without internal design, marketing or waste education staff. All councils that mentioned the library during consultation for this Strategy said it was a fantastic resource.

The NSW EPA sponsors a number of Keep NSW Beautiful (KNSWB) activities, such as the Blue Star Awards, the Litter Congress and the Community Litter Grants. Councils would like to see the EPA support the excellent work that other organisations also do in this area.

The action plan states that the EPA will 'pilot a schools litter education program together with a new "School Litter Check' evaluation tool'. There are a number of organisations that provide excellent waste education and litter programs for schools. Councils hope that the EPA will allow all providers the opportunity to be part of this program. In order to provide a holistic waste education program for NSW school children, it is first recommended that co-mingled recycling is available at all NSW schools. In order to make this possible, a strategic partnership with the NSW Department of Education will be required.

Recommendations:

1. Invite local government feedback on the Hey Tosser! campaign refresh.
2. Consider supporting more/other litter reduction organisations.
3. Ensure all providers are given opportunity to be part of the schools programs.
4. Partner with the NSW Department of Education to ensure all schools are provided with comingled recycling.

Approach 3: Infrastructure and clean-up

Local government welcomes the cigarette butt litter research outlined in the Strategy. The action plan states that this research was carried out in March 2017. LGNSW is not aware of this research being published as yet. The EPA is encouraged to share this research with councils if it has not already done so.

Inconsistency of public place litter bins causes user confusion which can lead to further litter. The standardisation of signage for public place bins could help to remedy this issue. It is recommended that the EPA works with other state agencies to ensure standardised signage is implemented across the board.

Recommendations:

1. Share cigarette butt litter research with councils.
2. Introduce standardised public place bin signage for all public land managers and work with all state agencies to implement the signage across the board.

Approach 4: Regulation and enforcement

Most of the councils consulted for this submission were unaware but interested in the training program available for authorised officers. LGNSW will endeavour to work with the EPA to promote this training to councils.

The EPA coordinates four planned litter compliance campaigns across NSW each year. Again, a number of councils were unaware of these campaigns but are interested in participating in them. LGNSW will endeavour to work with the EPA to encourage council participation in these campaigns.

Many councils have found that an education and enforcement presence is essential in delivering behaviour change outcomes. From the inner city to regional areas, councils say that those with dedicated education and enforcement presence see the best results. Further support for this purpose would be welcomed.

Recommendations:

1. LGNSW work with EPA to promote the EPA's litter enforcement training program.
2. LGNSW work with EPA to promote the planned litter compliance campaigns.
3. EPA consider supporting key public land managers to employ dedicated litter staff.

Approach 5: Evaluation and monitoring

Social research provides important information for litter management practitioners. Councils appreciate the EPA's leadership in carrying out state-wide social research to determine NSW residents' attitudes and behaviours.

Councils also support the on-going monitoring and evaluation of EPA funded litter projects and programs.

We have no recommendations related to this approach.

Conclusion

As a major land manager and point of contact with the community, councils are at the forefront of litter management. The work that the EPA has been doing and will do as a result of this Strategy is welcomed. This submission makes a number of recommendations to the EPA about how to further this important work. The major recommendation is to plan for the 'next Container Deposit Scheme' to target other commonly littered items. LGNSW and NSW councils look forward to working with the EPA on delivering this Strategy and reducing litter across the state.

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