

Submission on the draft Changing Behaviour Together: NSW Waste Less, Recycle More Education Strategy

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Opening

Local Government NSW (LGNSW) is the peak body for councils in NSW. It represents all the 152 NSW general-purpose councils, the special-purpose county councils and the NSW Aboriginal Land Council. In essence LGNSW is the 'sword and shield' of the NSW Local Government sector.

LGNSW is a credible, professional organisation representing NSW councils and facilitating the development of an effective community-based system of Local Government in NSW. LGNSW represents the views of councils to NSW and Australian Governments; provides industrial relations and specialist services to councils; and promotes NSW councils to the community.

LGNSW welcomes the opportunity to comment on *Changing Behaviour Together: NSW Waste Less, Recycle More Education Strategy 2015-17* (Strategy). In development of this response, LGNSW sought feedback from NSW councils and regional waste groups. This feedback has been incorporated into the submission.

Please note that this submission is provided in draft form, in anticipation of LGNSW Board endorsement on 5 June 2015. LGNSW will advise the EPA of any amendments to the submission after this date.

Response

As the primary waste education provider in NSW, Local Government commends the NSW Environment Protection Authority (EPA) for developing the Strategy, and its multi-stakeholder approach to waste education in NSW. Further, the level of consultation and communication the EPA has afforded Local Government in the development and consultation phase of the Strategy is appreciated. Establishment of the Local Government Education Reference Group in particular was of value.

The LGNSW response provides a high-level response to the Strategy, followed by a detailed response in line with the Strategy's structure. This reflects the format of feedback obtained from NSW councils and regional waste groups in developing this response.

Overall, Local Government is supportive of the Strategy and recognises the value of the document in supporting Local Government waste education programs.

The timing of the Strategy

The challenge of establishing an education strategy mid-way through the Waste Less, Recycle More (WLRM) initiative is acknowledged. This short timeframe for delivery is considered to limit the potential strength of the document. We would suggest that the Strategy may be better placed to support the Waste Avoidance & Resource Recovery Strategy up to 2021, while the action plan could support the Waste Less, Recycle More initiative up to 2017.

Structure and readability

The document is considered easy to read and navigate, however the inclusion of a graphic detailing the structure of the document, including linkages between the Principles, Strategic Directions, Actions and Evaluation would enhance this experience more broadly.

The intent

The intent of the Strategy is not entirely clear. This could be overcome with the inclusion of a section at the beginning of the document detailing the stakeholder's roles and responsibilities.

Local Government is supportive of the EPA's intent and commitment through the development of this document to integrate the principles of the Strategy into all remaining WLRM programs delivered.

Language

The language is clear and easy to read. However, a strategic document of this kind would be expected to use language that inspires and provides greater leadership to other stakeholders. The Strategy would benefit from strengthened language, however we recognise that the language may have been subdued due to the limited time horizon for the Strategy (i.e. through to 2017).

Whole-of-government approach

A whole-of-government approach is vital when considering this Strategy as part of the bigger picture. For the Strategy to be successful, a whole-of-government approach should be applied where the EPA continues to work with Local Government on waste issues, but also with other State departments and the Australian Government. This would include the integration of this Strategy into a greater NSW Government sustainability agenda, and utilise partnerships, influence and other tools to meet waste education needs in NSW.

The vision

It is noted that there are two vision statements in the Strategy (page 1 and 3). This submission focusses on the expanded vision on page 3. This vision covers all WLRM programs; however as mentioned above, Local Government values longevity in the vision, beyond WLRM.

Local Government supports the inclusion of the phrase 'build positive attitudes' in the vision; however we suggest 'build positive attitudes toward waste outcomes' may enhance the vision.

Inclusion of the word 'community' in the vision is somewhat confusing, particularly in relation to which stakeholders 'community' includes. We would suggest that the whole of NSW should be included in the concept of 'community', including business and industry.

Embedding the waste hierarchy

The waste hierarchy is central to Local Government waste education programs. A small number of actions are proposed to focus on waste avoidance and reuse. However insufficient attention has been paid to these critical elements of the hierarchy. Whilst this may be reflective of the avoidance/reduction/reuse gap in WLRM, an opportunity lies in this Strategy to bridge that gap and embed the waste hierarchy more fully.

Principles

Local Government supports the principles in the Strategy. However, Local Government values application of these principles beyond WLRM, to all EPA actions and to actions within the EPA's sphere of influence.

Some of the principles could be combined, for example principles 4, 5 and 6 relating to behaviour change.

It is not immediately apparent what the difference between principles and strategic directions are. This could be overcome through the use of a graphic (as described in the Structure and readability section above), as well as a clear definition of what each element is and its function within the Strategy.

Strategic directions

Strategic direction 1: Local Government supports the use of consistent messaging where relevant, which potentially saves 152 councils separately developing and delivering individual messages. Consistent messaging is relevant when messages are and should be common across the State. The Hey Tosser! campaign is provided as an example of a campaign where consistent messaging didn't work due to the diversity of the NSW community (especially CALD communities).

From a service communications perspective, it is suggested that this strategic direction be expanded to include consistent language e.g. there is a variety of language utilised across the State to describe 'garden organics' and other such terms.

Strategic direction 5: Resources and tools are welcomed to support councils in delivery of their waste education programs. However, due to the diversity of the NSW community, these tools and resources need to be made adaptable.

Actions

There are many good actions proposed or already in place in the action table. The following is a list of responses to specific actions.

Action 1.1: Local Government is supportive of further social research being carried out although this work would ideally have been carried out prior to WLRM and to inform this Strategy. It was suggested that in some cases, regional or sub-regional social research may be more beneficial, affording local relevance, and if done across all NSW regions, state-wide relevance too.

Action 1.2: On the whole, Local Government is *not* supportive of a state-wide kerbside recycling campaign. This lack of support is not because we oppose kerbside recycling but is related to the differing services provided across the state, with some councils not providing a kerbside recycling collection at all. By the time all the idiosyncrasies are removed, the campaign is likely to be so light on, that the messages will be of limited value. Behaviour change campaigns with wider reach such as a campaign about waste avoidance, packaging waste or illegal dumping may be more effective.

Action 1.3: This action includes the integration of the Strategy's principles into specific documents including the regional waste strategies. This action is supported as the principles of the Strategy are considered to be in harmony with the existing regional strategies. Local Government does however expect that the Strategy's principles will be integrated into all EPA practices, beyond the grant guidelines and EPA strategies mentioned in this action.

Action 1.4: As detailed above, concern is raised with the appropriateness of the Hey Tosser! campaign across the state. This campaign is considered to be in conflict with principle 5 ('has a positive call to action').

Action 2.1: It was noted that outside the education clauses of the model contract, other clauses could be utilised to drive up diversion by altering the recycling contractor's practices.

Action 2.2: Concern is raised with the implication that landfills are undesirable. Although poorly managed landfills are undesirable, for some communities there are limited options other than landfill. We suggest that avoidance and recycling is promoted in these cases, aiming to emphasise the importance of the prolonged life of well managed landfills.

Action 3.3: The proposed forums are welcomed and are likely to enhance existing waste networks. We suggest there may be benefit from exploring case studies about unsuccessful projects as well as successful projects at these forums.

Action 3.5: LGNSW notes that the EPA also supports other events, including our Excellence in the Environment Awards and the Waste Conference.

Additional to the actions outlined in the action plan, there is a need for more education in the following areas: waste avoidance, industrial ecology, packaging waste and emerging technologies as they arise (e.g. energy from waste). Additionally, more education actions need to be targeted at the following stakeholders: CALD communities, tenants, planners and private certifiers.

Evaluation

Overall there is limited support for the evaluation framework proposed. There is confusion around the two evaluation tables, what and how the evaluation would be measured, and if the measures actually relate to the Strategy. For example, it would be easy to assume the second evaluation table related to the action table, when it does not. In short, the actions in the Strategy need to be evaluated, and this evaluation should link up to the vision, through the strategic directions.

Appendices

The appendices are generally supported but the key themes in Appendix A could be of value at the front in the document, to support the vision statement. The inclusion of Appendix C outlining the regional waste education initiatives is a valuable inclusion.

Conclusion

Overall Local Government is supportive of the Strategy and appreciates the EPA's efforts in its development, especially in seeking early input from Local Government. LGNSW has predominantly received positive feedback on the draft Strategy from the Local Government sector. This submission outlines in some detail potential changes which could enhance the Strategy. Key areas for focus include the timeframes for the Strategy, connection of the key elements of the Strategy through to a robust evaluation framework and the inclusion of actions for wider reach.

LGNSW appreciates the opportunity to provide this feedback on behalf of Local Government in NSW.