



29 May 2015

Regional Delivery
Waste and Resource Recovery Branch
NSW EPA
By email: wasteless.councils@epa.nsw.gov.au

Dear Sir or Madam,

Re: Draft Waste Less Recycle More Education Strategy 2015-17

SSROC is an association of 16 local Government councils originally established in 1986. It is a forum whereby member councils work together to achieve solutions to the challenges facing the southern Sydney region.

This submission on the Draft Waste Less Recycle More Education Strategy 2015-17 has been prepared for the NSW EPA by SSROC on behalf of its sixteen member councils.

We note of particular interest:

- That the EPA has advised the Regional Strategic Coordinators that a state-wide communications (media, including television) program to improve recycling is a priority for the EPA and is already in the planning phase.
- That the EPA anticipates at least six months (i.e. September 15 onwards) until it would be on screen.
- Councils will be keen to be kept abreast of progress so that key messages can be included in complementary local and or regional initiatives.

Vision, Principles and Strategic Directions

SSROC strongly supports the principles upon which the strategy is based, and the six strategic directions as the basis for action. We would suggest that the strategy could be further enhanced by specifying goals or objectives, which make the intended strategic outcomes explicit. Currently outcomes are implied in the vision, but not defined or quantified. With such a short timeline (2015-17), grounding the strategy in shorter-term objectives would be helpful.

In reconciling the long-term nature of the vision with the short timeframe of the strategy, we would suggest that the duration of the Education Strategy should be extended to 2021 in line with the WARR strategy, and the action plan should constitute the first phase, covering the WLRM period 2015-17. This would allow the Education Strategy to continue supporting the WARR Strategy, whatever happens to the WLRM package in 2017, and would align it with all the regional strategies. The outcomes of the Education Strategy phase 1 could then be reviewed at the same time as the regional strategies, aligning all with the WARR strategy.

Scope

Southern Sydney Regional Organisation of Councils
(SSROC) Inc.

Level 2, Suite 2E,
Hurstville House
34 MacMahon Street,
Hurstville NSW 2220

PO Box 536,
Hurstville
NSW 2220

T 02 9330 6455
F 02 9330 6456
E ssroc@ssroc.nsw.gov.au



Roughly half the projects due to be delivered in two years are ongoing. It would be valuable to include a review of those initiatives to ensure that they align with the Education Strategy's principles and that they are to be delivered within the framework of the strategic directions. For example, project 2.9 "Continue to improve the knowledge and skills of environmental regulators by running training on illegal dumping prevention and clean up" would potentially require the training to be adjusted in support of the principles, evaluation framework and strategic directions of this strategy.

Including the evaluation framework and links to the overall Waste Less Recycle More program areas is very useful.

Timing

The Councils are very pleased to see an Education Strategy for the delivery of WLRM and commend the EPA for recognising the value of education in supporting effective use of the new infrastructure solutions that are being funded through the Waste and Recycling Infrastructure package.

It is unfortunate that the educational approach was not launched substantially earlier, preferably with the commencement of the WLRM package. Its release at this stage means that it will effectively only be available for the last two years the package. The inference could be drawn from this timing that the package is an add-on rather than integral. This inference could be countered by emphasising in the content of the messaging that this educational approach is key element of the overall strategic approach.

We understand that the WLRM package concludes at the end of June 2017, with councils' reports on their strategy implementation actions due at that time. However this education strategy lists 2017/18 as the final reporting year. Could the EPA clarify whether or not Councils will be required to report in 2017/18?

The late release of the 2014 Waste and Recycling Benchmark Study is affecting the design and delivery of educational and communications programs for Councils, since they had anticipated its release in December 2014, then early 2015. We urge the EPA to release the findings of this study as soon as possible, so that it can inform projects for delivery in 2015/16.

Project Collaboration

Regional coordinators and councils are rightly identified as partners and stakeholders. However, 2014/15 projects are already underway, and 2015/16 project plans have already been submitted to the EPA. That leaves only 2016/17 in which the EPA might pro-actively work with the named partners to ensure that the actions in this plan are delivered with, and through, their stakeholders. Again this is a major timing challenge for the success of this plan if it is constrained to two years.

The EPA has advised the Regional Strategic Coordinators that a state-wide communications program to improve kerbside recycling is a priority for the EPA and is already in planning (project 1.2). That comprehensive social research will inform the initiative (Project 1.1). SSROC and its member councils are very supportive of this initiative and keen to see it on the radio, in social media and on television. However, we are disappointed at the timing with delivery not anticipated by the EPA until August 2015. We suggest that EPA work with Planet Ark to find a way to use their existing research on contamination issues and successful recycling, and potentially partner with Planet Ark in the program roll out: this could help to accelerate the process.

SSROC welcomes the EPA's suggestion that a state-wide waste avoidance media initiative should follow, and member councils would be keen to be involved in any working group. We urge that this initiative should be included in the action plan.

Other projects that Councils have raised as being of specific interest in light of local or regional action plans are:

- In relation to action 1.1. Social research – SSROC currently has social research in the field regarding reuse attitudes and behaviours, including questions relevant for problem wastes and illegal dumping. This will be provided to the EPA when complete.
- Action 2.2 Standard communication materials – SSROC has set aside WLRM budget to commence work with waste service providers in 2015/16. We recommend that the EPA undertake a review similar to that conducted in South Australia whereby the government worked with local councils to review their existing materials. The process achieved improved and updated collateral available to all local councils, as well as an increasing knowledge and educational skills across government with all educators learning about latest practice and technologies at the processing plants. We recommend that this project should be run as a priority in July 2015 so that it complements the proposed state-wide media.
- Councils generally support the range of initiatives to support their work on illegal dumping, locally and regionally (2.6, 2.8, 2.9 - 2.11), and we commend the EPA on the quality of education and support materials woven into the Love Food Hate Waste initiative (2.13). Councils continue to welcome this program area, although the level of evaluation required is thought to be unduly onerous for the level of grant funding available to date.
- Councils welcome and support initiative 3.3, which could be run at both the annual WMAA waste conference and through AAEE NSW the WMAA Educators network or with a university partner.
- Provision of training modules, 3.4 (not just directed at educators) is particularly welcomed whilst waste and related legislation is undergoing such high level of change.
- There appears to be a substantial overlap between projects 4.4 and 4.2. EPA could consider merging these two actions.
- Action 4.1 would be very helpful now: we would suggest that the EPA consider collating existing materials now, for dissemination in 2015.
- Action 5.4 is of key importance for SSROC councils. Recognising it is a long task, which should also be addressed in the sub-regional plans, we greatly appreciate the work that the EPA is already doing to help Councils to work with the Department of Planning to address the planning matters that mitigate against improved resource recovery.
- Action 5.5 will be most helpful for SSROC councils, so we are keen to be involved. As noted above, our social research project will inform this action.
- Action 5.7 is very similar to action 2.13: they could be reviewed and perhaps merged to remove apparent duplication – with a resulting reduction in projects listed and greater clarity.
- Action 6.1 could be addressed effectively through the Regional Coordinators meetings or additional action learning meetings for Regional Networks running e.g. LFHW or MUD projects.

Other matters

Information on available budget and resources to deliver the projects would give the local government sector confidence that the EPA will be able to deliver on the wide range of initiatives listed in sufficient depth and range to make a difference within the target communities across NSW and within the timing of the strategy.

The evaluation section of the strategy is very helpful, and should be promoted heavily, particularly as:

- it links educational outcomes to WLRM outcomes for the particular program areas, and
- it provides evaluation questions and evidence sources that councils could use themselves if undertaking local or regional social research.

SSROC looks forward to the provision of regional datasets from the 2014 social research, as these will be used for the regional strategies and can be used as surrogate data for local councils.

It would be helpful to direct the reader to the appendices, particularly A and B as they provide non-EPA staff with guidance about how to deliver education programs. Once the strategy is adopted, the



use of the principles should be demonstrated when Councils submit education related WLRM and BWRP projects for approval.

SSROC would also suggest that the 2014 social research project should be repeated in 2017 and therefore sufficient funding should be allocated.

Conclusion

SSROC commends the EPA on the approach taken to developing and delivering the plan, particularly in assembling using the reference group. In general, we strongly support the plan, and appreciate the opportunity to participate in its development and to comment on this draft. Our major concern is with the feasibility of delivery within two years, but we feel that this concern could be addressed in the manner outlined above.

I hope that these comments will be a useful contribution to the finalisation of the draft. Should you wish to discuss them any further or need any clarification, please do not hesitate to contact me on 02 9330 6455 or ssroc@ssroc.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink that reads 'H. Sloan'.

Helen Sloan
Program Manager
Southern Sydney Regional Organisation of Councils