



13 April 2017

Director
Environmental Biosecurity Section
Department of the Environment and Energy

By email: marinedebris@environment.gov.au

Dear Sir or Madam,

Re: Draft Threat Abatement Plan for the impacts of marine debris on vertebrate marine life (2017)

The Southern Sydney Regional Organisation of Councils Inc. (SSROC) is an association of Councils in the area south of Sydney harbour. SSROC provides a forum for the exchange of ideas between our member Councils, and an interface between governments, other Councils and key bodies on issues of common interest. We facilitate collaboration between councils on joint ventures, procurement, and projects including advocacy. Together, our member Councils cover, a population of over 1.6 million, or one third of the population of Sydney.

SSROC strongly supports the implementation of an effective Threat Abatement Plan for the impacts of marine debris on vertebrate marine life, and agrees with the Government's reliance upon engagement from all stakeholders. It is a complex problem requiring multiple solutions and participants.

The introduction to Australia's Biodiversity Conservation Strategy 2010-2030 states that "Conserving biodiversity is an essential part of safeguarding the biological life support systems on earth. All living creatures, including humans, depend on these systems for the necessities of life." This is the main reason why a very developed and populous area of metropolitan Sydney is concerned to ensure the conservation of biodiversity, including marine life. SSROC therefore welcomes the opportunity to participate in the development and implementation of this Threat Abatement Plan (TAP).

Objective 1. Contribute to the long-term prevention of the incidence of marine debris.

SSROC is pleased to see the recognition of the roles of ecologists and engineers in identifying and removing features of products that might cause ecological impacts, and supports all the actions, outcomes and outputs listed.

We would also urge the Department to acknowledge the role that communities play in generating the debris, and to promote citizens taking responsibility for their own pollution. In particular, plastic bags and utensils, fishing gear and balloons are all within the capacity of individuals to control. This is relevant particularly to action 1.02 *Limit the amount of single-use plastic material lost to the environment in Australia*, where consumers are directly responsible for the littering that permits these items to be "lost to the environment".

The NSW EPA's "Hey Tosser! Put it in the bin" campaign is an example of an intervention designed to promote individual responsibility for litter. Campaigns could also be developed for specific locations and interest groups such as fishing clubs and party venues. Other campaigns aiming at individual responsibility include Sea Shepherd's *Marine Debris Campaign*, Keep Australia Beautiful's *Clean Marine*, and Balu Blue Foundation's *Clear Tides*. SSROC would therefore recommend that NGOs and Citizens or Community be included in those with responsibility for action 1.02.

It would be helpful to alter the outcome of 1.02 to “A decrease in the quantity and impact of single use plastic ...” rather than “A decrease in the impact of single use plastic ...”, since the outcome as currently drafted does not cover the whole of the potential effect of the action, particularly if the TAP incorporates the concept of responsible citizens.

With this modified outcome, an output could be added to cover campaigns to promote responsible citizenship and awareness of the detrimental effects of marine debris. Citizens and/or community could then be included as responsible parties, charged with taking responsibility for preventing litter.

Action 1.03 could also include community as responsible for implementing systems to prevent waste. The community role is already developed in this area, with most household now actively participating in Council recycling collections. Communities are also increasingly recycling through alternative channels such as Gumtree and eBay, as well as through reuse and re-homing initiatives such as The Bower in Marrickville.

SSROC particularly supports Action 1.04, and the outcome in relation to waste to energy technologies. Our own research¹ into social attitudes to these technologies indicates that further work is required to win people over to accepting that this solution is viable, environmentally sustainable and beneficial to human health. The responsibility for this action also resides with State Government, which regulates and licenses land-based waste facilities, and needs to respond to emerging technologies in this area.

Objective 2. Identify key species, ecological communities, ecosystems and locations impacted by marine debris for priority action.

SSROC supports this objective and associated actions.

Objective 3. Conduct research to understand and mitigate the impacts of marine microplastic and plastic debris on marine species and ecological communities.

SSROC supports this objective and associated actions.

The draft TAP notes that “implications for the food chain, including human diet, require further investigation” (page 19). SSROC would recommend that this investigation be included as a research action.

There is also a need for research into the currents and other forces that influence the movement of marine plastic pollution, and which cause it to concentrate in particular locations. This element could be included in action 3.03, or could be another, separate action.

Objective 4. Remove existing marine debris.

SSROC supports this objective and associated actions, however we strongly urge caution and adherence to the precautionary principle in relation to the output of action 4.04, “Strategic use of organisms able to biologically breakdown plastic”. The outcomes from changing an ecological system to address one problem often include perverse effects, as with the introduction of cane toads.

Objective 5. Monitor the quantities, origins, types and hazardous chemical contaminants of marine debris, and assess the effectiveness of management arrangements over time for reducing marine debris.

SSROC supports this objective and associated actions. As a general principle, it is not possible to control something that cannot be measured: and an overarching strategy for identifying baselines, measuring and evaluating the effectiveness of the range of interventions appears to be lacking.

The 2009 Background Paper noted this lack of information (page 25), and put forward the development of a national approach to information collection and management: this action should be carried forward to the revised TAP.

¹ This report is not published, however, SSROC would be happy to provide more information on request.

The action could be “Department of Environment and Energy in collaboration with state and territory governments and other relevant stakeholders to support the development of nationally consistent, statistically rigorous data collection protocols and survey methods.”

And further, an output from action 5.02 could be “National mapping of the spatial distribution and concentration of marine debris over time is used to assess the significance of marine debris and to reduce its occurrence” as an enhancement to the draft outcome “An accessible information repository for marine debris data”.

Objective 6. Increase public understanding of the causes and impacts of harmful marine debris, including microplastic and hazardous chemical contaminants in order to generate behaviour change.

SSROC supports this objective and associated actions. This element is essential in bringing change, and requires a national drive to change culture and attitudes to promote the preference for non-plastic products.

Investment in the Plan

Many of outputs identified will require funding, but are not included in the estimated costs. The Department needs to consider the potential sources of funding for those activities and outputs that are not currently funded, so that other agencies and responsible parties can take these into account in their own planning.

The draft plan notes that “Economic returns ... are likely to remain small, at least for the life of this plan.” It would be helpful to acknowledge that future economic returns could be more substantial: for example, the circular economy and establishment of a waste-to-energy industry could create opportunities for investment and new jobs, as well as achieving environmental benefits.

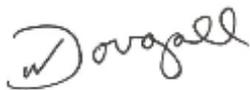
Conclusion

SSROC supports the implementation of the TAP, and appreciates the opportunity to provide this feedback. There is a significant gap between the funding allocated and the funding needed to achieve the outcomes of the TAP, and we urge the Department to explore options for funding all the actions.

Please note that, due to the timing of this submission, it has not been possible for it to be reviewed and formally endorsed by SSROC. I will contact you if any issues arise as a result.

If you have any questions about this submission please feel free to contact me or Helen Sloan, Program Manager SSROC on 02 8396 3800 or ssroc@ssroc.nsw.gov.au.

Yours faithfully,

A handwritten signature in blue ink that reads "Dougall".

Namoi Dougall
General Manager
Southern Sydney Regional Organisation of Councils