



**SSROC submission on the
*NSW Plastics: Next Steps Paper***

**Submitted to the NSW Environment Protection Authority
by email: plasticconsultation@epa.nsw.gov.au**

Introduction

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of 12 councils spanning Sydney's southern suburbs, eastern suburbs, CBD, and inner west and covering a third of the Greater Sydney's population, over 1.8m people. Our Councils manage around 655,000 tonnes of household waste each year, which is about 20 per cent of all NSW household waste.

SSROC provides a forum through which our member councils can interact, exchange ideas and work collaboratively to solve regional issues and contribute to the future sustainability of the region. We advocate on behalf of our region to ensure that the major issues are addressed by all levels of government. Our current focus includes the environment, procurement, waste, and planning.

We strongly support the NSW Government's effort to reduce litter by enforcing design specifications and standards for domestic and overseas consumer goods, and providing systems that enable community members to do their part.

In addition to the items proposed, we urge the NSW Government to ban PVC packaging in food and beverage containers where a reusable alternative is available, such as cordial bottles or baking trays. Banning PVC packaging in common food packaging was a high priority for both plastic recyclers, secondary processors and MRFs in [SSROC's Research on Recovering Plastics from Kerbside Recycling](#) because PVC contaminates easily recycled plastics such as PET and creates safety and health risks downstream.

Another high priority is e-cigarettes or vapes which are not only creating a single use plastic pollution problem, but with the batteries in the vapes are a high fire risk in kerbside systems and Material Recycling Facilities (MRFs). The NSW Government should work with the Australian Government to treat vapes as a single-use item that requires banning, and to monitor the sale and distribution of permitted vapes.

SSROC urges the Government to consider the unintended consequences of banning single-use plastics. Encouraging alternatives to the banned items sometimes creates markets for non-recyclable products with greater greenhouse gas impacts from their manufacture than plastics. Alternatives that are reusable, made from natural materials should be promoted and incentivised, and easily recycled at the end of life. Consumers and retailers also need clarity in the proper second use, disposal, and labelling of alternatives to the banned items.

Another unintended consequence is in off-take arrangements for selected packaging of food and grocery products, such as fruit and berries in plastic tubs which are made from 100% recycled content. The Government needs to understand first the extent to which this plastic mould with 100% recycled content and is recyclable. Some trade-offs (such as poor shelf-life of fruit and berries, causing more food waste and more deliveries) may undermine the benefits. That said, 100% recycled content should be required for this type of packaging, and recyclable via domestic comingled bins.

Continuous research, testing and market development is needed to ensure that there are suitable, replicable and sustainable options available on the market. Additional consumable items for consideration in the plastics strategy are:

- Phased ban of decorative items used outdoors such as glitter, artificial cobwebs or confetti. These items are known to create microplastic litter in waterways. Alternatives that claim to be biodegradable need to be tested.
- Immediate ban (with a reasonable grace period) on public release of balloons, not a phase-out. Air and water-filled balloons are known to result in litter and micro-litter in public places.
- A ban on helium balloons would prevent accidental release.
- Bans should include rubber and foil balloons.
- Balloon accessories (sticks and ties) made of wood and paper should be investigated.
- Drink bottles and shampoo bottles should be PET and transparent. Plastic recyclers and MRFs confirmed in [SSROC research](#) that clear and blue coloured PET is in high demand while brown and green coloured PET has a much lower value, yet the volumes of brown PET have increased considerably with the popularity of health drinks like kombucha.
- Coloured PET trays such as mushroom and meat trays are also hard to find a market for. In our research, one MRF commented that some of this low value coloured PET goes into making fibres and recommended the phase out of coloured PET in food and beverage containers. Recently, Japan and Korea phased out PVC and coloured PET in food and beverage containers.
- Reduction and removal of all secondary packaging (such as a bag of individually wrapped candy bars)
- Support bans for single-serve condiments; however, caution is needed when setting a size or specification limit. Need to ensure plastic bags do not just get thicker, or sauce packets do not just get larger.
- Bread tie bans should include metal ties. Replacements should specify cardboard tags.
- Meat tray design and wraps should be recyclable together or easily separated into different parts. The current trend to towards vacuum packed trays causes the tray, the soft plastic and the large sticker to be inseparable.
- Controls on mixed content product packaging (e.g. when plastic is glued to cardboard/paper (post packs) rendering both non-recyclable).

Other systems and policy positions to be considered:

- Though councils generally support these bans, we suggest a package of funding for Environmental Health Officers, rangers and educators, and heavy NSW marketing campaign for the first 2-3 years as communities transition towards the bans.
- Emphasise friendly but firm enforcement methods that prioritise education and impose penalties only as a last resort in serious breaches, including providing tools for small businesses and retailers to support their switching to compliant packaging and goods.
- Consider funding for regional educators or council rangers and teams to target problematic areas.
- Consider funding a large public education campaign about the impacts of microplastics and pollutant degradation of the items in the environment. Most of the items listed in the strategy should be labelled 'single-use'.

- Engagement should be targeted for culturally and linguistic diverse shop owners, shopping centres and mixed commercial and residential precincts with high use of single use plastic in food and beverage areas. Food courts, cafes and restaurants with dine-in facilities should be required or incentivised to provide reusable crockery rather than single use.

SSROC supports the setting of design standards for items and their packaging and ensuring that brand owners are taking responsibility for products across their lifecycle. Manufacturers and producers should take an 'end of first use' approach which includes recyclability, and plan for production and sourcing exclusive of all the banned and problematic items specified.

As bans come online, Australia and New Zealand should require compliance with its trade partners and Asia-Pacific neighbours that it will not do business with non-compliant items, and establish and promote themselves as a leading example for standards and systems development.

The NSW Plastics paper does not address how it will work with overseas trade partners and NSW Ports Authority to require compliance or restrict the import of single use plastic packaged goods into food businesses and small groceries in Australia, both large supermarket chains and smaller Asian supermarkets and specialty grocery chains.

Other design and packaging considerations

- Importers of poorly designed and non-compliant items must be closely monitored and fined.
- Ban the misuse of symbols and terms that promote greenwashing and are misleading to consumers. Common terms include; 'degradable', 'multi-use', 'biodegradable', 'oxo-degradable', 'photo-degradable', 'enviro-/eco-', 'bio-plastic', 'renewable plastic', 'naturally-made' (or similar).
- Include stocks of items and their packaging that are not compostable or biodegradable in the ban.
- Many fibre-based and compostable items already on the market as plastic alternatives have minimal or no potential for recycling in NSW. Regulations will require careful wording to ensure that recyclability *in NSW* is a factor in ruling on whether an alternative material complies. Future strategies for reducing single use plastic should also focus on incentives to increase the use of reusable items.
- Replacement options should also be fit for reuse and/or recyclable by the MRF at the end of life. Replacing recyclable single use items with compostable items, but which cannot be recycled, does not achieve the end goal.
- To avoid plastic shopping bags being replaced with more fibre or other fossil fuel derived shopping bags, consider whether alternative single use items could be disincentivised through a levy or other fiscal means.

Phasing out harmful chemical additives such as PFAS

- Eliminating PFAS is critical and urgent, but not the only harmful chemical. The need to phase out other all harmful chemicals in product design should be considered at the highest levels of government and trade requirements.

- Need for strong definition and education about what is considered PFAS, whether added by manufacturers or further down the supply chain.
- Suggest the Federal Government assist with the rapid development of home and commercial testing kits for PFAS or other harmful chemicals or microbeads, so that communities can be better educated and take stock of their own consumption behaviours.
- Send a signal to domestic and overseas product manufacturers and retailers that harmful chemicals are headed towards bans, and enforcement, testing and education are part of a multi-pronged approach.
- The rapid rise of fast fashion and accessories market en masse and produce very cheap plastic items including children's toys and clothing, but bypass current testing.
- Microbead bans should include cosmetics. Consider extending to include any product with potential to enter the drain.
- Consider funding and commissioning research into filtering microbeads at sewage treatment plants, or if a solution is known, fund its development.

Please note that although Member Councils have provided information for this submission, it has not yet been endorsed at a formal meeting of SSROC. I will contact you should any issues arise as a result.

Thank you for this opportunity to contribute to the discussion. For any enquiries, please contact me by email: ssroc@ssroc.nsw.gov.au, or 02 8396 3800.



Helen Sloan
Chief Executive Officer
Southern Sydney Regional Organisation of Councils