



SSROC submission on the
NSW Plastics: The Way Forward
Draft for consultation

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

Due date: 4 November 2024

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.

In this submission, we have collected feedback on the *NSW Plastics: The Way Forward* from our member councils and summarised our collective feedback below. The next section summarises our key recommendations, followed by some feedback on the Consultation Paper.

Overall recommendations

SSROC acknowledges the EPA's objectives to reduce plastic litter, reduce harmful chemicals in plastics and microplastics, and maintain its role in phase-outs and other actions on plastics. We also highly commend the EPA on its consultative process with community groups, environmental organisations, industry bodies and businesses. This is a leading practice, and local government will continue to seek participation in co-design of policies and strategies.

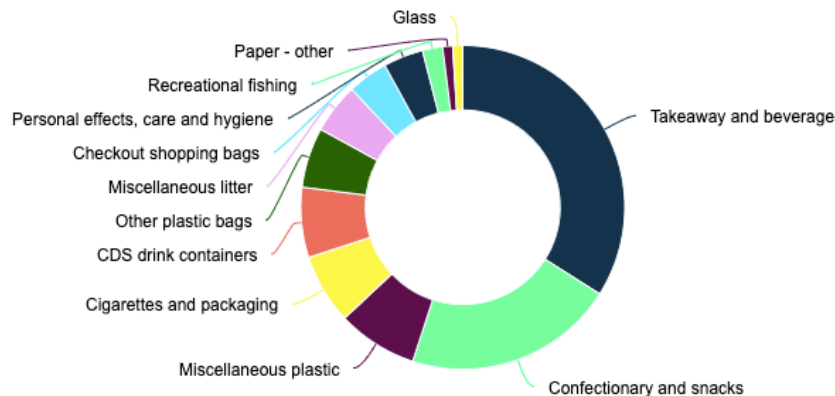
In summary, SSROC believes *NSW Plastics: The Way Forward* (the Plastics Plan) is a well-meaning vehicle for change but may be limited because its strategic driver is for reduced litter. Our preference would be that a NSW Plastics Plan utilises a more comprehensive alignment with other Australian and NSW initiatives – and taking guidance from European examples – by taking a circular economy approach, instead of a litter line.

There are benefits to a 'litter approach' that should not be discounted, for example:

- The National Litter Index and Australian Litter Measure are useful data capture and monitoring methods – together making up the NSW Litter Data Framework. From the data we have much greater awareness about the composition of urban, parklands, beach and marine litter. The table below from NSW EPA litter website (<https://www.epa.nsw.gov.au/your-environment/litter/data-and-targets>) shows the 2018-19 example.

Baseline litter composition by category (density of litter)

2018-19 data



- Recyclability of single-use plastics which are commonly littered is a principled objective of the Plastics Plan and coincides with the Australian Packaging Covenant Organisation's (APCO) sustainable packaging targets.

Unfortunately, plastics consumption, plastics avoidance and packaging or other plastics reuse is largely missing from the Plastics Plan – aside from a few key areas – and the NSW Government is missing an opportunity to chart a new path forward for businesses and communities about plastics environmental and societal costs. The emphasis of the Plastics Plan should be on phasing out and avoiding plastics wherever possible, social support and funding for alternatives, and robust markets for innovation and re-manufacturing.

The reality is that both litter and public litter bin waste is often too difficult to recycle, too contaminated or too low-value to send on for sorting or recycling at scale. One SSROC council informs us that overall generation of waste disposed in the public domain has not reduced since the introduction of the EPA's single-use plastics ban took effect in 2022.

'Recyclability' is too far down the waste hierarchy to achieve circularity

As NSW transitions to a circular economy, local governments need clear, unambiguous policies. The NSW Plastics Plan is not only a key component to changing the discourse and business practices – it ought to be a beacon of the transition. The Plan cannot expect or commit to circularity with a litter or recyclability rationale.

To achieve the highest and best outcomes, a circularity-driven Plastics Plan would mean clearer guidance on a broader range of phase-outs, avoidance, reuse, limits to plastics production, and codes or standards for businesses to eliminate design and purchasing of composite materials.

Lower-order options include packaging and plastic products with verifiable recycled content and recyclability. The recycled plastics industry seeks stability and clean feedstock, and State Government and industry are responsible for shifting the emphasis and inclination for plastics consumption. Councils continue to support progressive changes, but are not responsible nor can they control the tide on saturation of plastics in our society.

Adopt a holistic packaging design standard

A holistic and universal packaging design standard would send a clear message, not only to industry but also to recyclers, collectors and off-take markets. The Standard should be a readable package with specifications, supported by guidelines, training and workshops that help brands and manufacturers design for and comply with NSW requirements and APCO's product stewardship targets. Belgium has implemented the [Design4Recycling guidelines](#) for all commercial and industrial packaging, and [Pack it Better](#) is a Belgian hub for knowledge sharing for sustainable and recyclable packaging.

The Standards package should be equitable yet mandatory (not voluntary) across all value chain stakeholders and emphasise shared responsibilities and support. It should also explain the regulatory regime, timeframes and implications for non-compliance.

Consumer confusion may be a perverse outcome if some brands and food outlets are complying, but others lag behind, especially when non-recyclable alternatives are still widely available. A unified approach and clear labelling, coupled with commitment to an awareness campaign is required.

Language used in the Plastics Plan is non-measurable and often voluntary

Ambiguous or voluntary commitments are not a strong enough signal to generate innovation or collaboration. The Plastic Plan uses non-measurable language in proposed actions (e.g., "Explore ways" and "Consider requiring"). This language suggests the actions are non-committal. Greater commitment is needed in mandating requirements for brand owners of highly littered plastic items, with equitable access and education for manufacturers, retailers and consumers.

Decarbonisation and rejecting virgin plastic should also drive the Plastics Plan

New plastics kill the recycled plastics economy. By reducing the need to extract virgin materials, non-organic and plastic waste streams retain considerable value when recycled, reused, or otherwise redeployed back into a circular economy, and further reduce greenhouse gas emissions. 'Cradle-to-resin' greenhouse gas emissions from plastics production are drawn from oil and gas extraction, transport and manufacturing. A North American study¹ shows that a 33% increase of resin production from 2015 to 2030 would equal 67.9 million Mt of greenhouse gases – just to create the resin. This is the equivalent of 20 five-hundred-megawatt coal plants.

There are opportunities for manufacturers to reduce emissions from plastic production such as using renewable energy sources, or using bio-based feedstocks such as corn-based plastics.² These are promising innovations in non-organic recyclability.

However, a NSW Plastics Plan that takes a circular economy transition seriously must consider tariffs or bans on virgin, non-recyclable and non-compostable plastics, and a reporting methodology that is transparent and regulated.

¹ Daniel Posen et al., Greenhouse Gas Mitigation for U.S. Plastics Production: Energy First, Feedstocks Later, 12(3) *Env'tl Res. Letters* (2017), <https://iopscience.iop.org/article/10.1088/1748-9326/aa60a7/pdf>

² Plastic & Climate: The Hidden Costs of a Plastic Planet (2019) Center for International Environmental Law, https://www.ciel.org/plasticandclimate/?utm_source=substack&utm_medium=email

Industry, government and advocacy groups in NSW and across Australia are considering a future with energy-from-waste technologies, which are used regularly in Europe to deal long-term with the growth of residual waste at an industrial scale. Energy-from waste technologies are getting cleaner every year, but in terms of carbon abatement, landfilling plastics (through collection, handling, transport) emits roughly 1% of the carbon emissions that waste-to-energy treatment does.³ This is not a submission about energy-from-waste technologies. But to prepare the groundwork for the future of NSW, a Plastics Plan needs to begin decoupling our dependence on plastics from our consumption habits and treating a better type of waste. A Plastics Plan that is clearly guided by avoidance or deterrence, reducing and eliminating production, reuse and recyclability is far more ambitious and equipped for a reduced carbon future.

A litter focus avoids big ticket, everyday plastics and composite packaging

There is no guarantee that littered items will be recycled just because they are recyclable. Monitoring the Plastic Plan's effectiveness through the Litter Data Framework will only capture part of Government's stated objectives. Local governments seek demonstration of a clear link between all the Plan's actions and litter reduction outcomes, or robust evidence to support how actions complement one another.

Furthermore, the Plastics Plan misses an opportunity to develop action on deterring or phasing out unnecessary plastics in larger products that are not often littered. Items such as milkcrates, plastic wrap for mailed newspapers, toys, household bric-a-brac, bulka bags, and shrink wrap can be ubiquitous in the community, and degrade the environment and street amenity when disposed improperly.

Other large items include: green PET bottles, builders plastic, pallet shrink wrap, grain tarpaulins, animal feed bags, postal packaging satchels, poly package strapping, silage wrap, road barriers and garden bed barriers.

These items are not likely to feature in litter counts, but are a drain on council cleansing and cleanup service teams, and the environment. Responsibilities also lie with commercial site or operations management teams, community groups and volunteers, and small business precincts.

A litter-driven Plastics Plan almost completely misses the commercial and industrial waste sector, but SSROC commends the EPA on the proposal to identify brand names on aggregated litter data. This is a useful tool to energise Corporate Social Responsibility initiatives provided they are meaningful – greenwashing must be watched.

Waiting for harmonisation between the States may be unhelpful

Waste and litter are controlled by the states. Waiting for harmonisation between policies, laws and procedures is fraught with risk. The cycles of politics, policy re-sets, the pace of change in technologies and markets, overseas factors and labour fluctuations are too variable sometimes to align. There are voices in the waste and recycling industry, retail and grocery bodies that seek total harmonisation between states – and there are very valid

³ Sound Resource Management Group, Inc <https://www.no-burn.org/resources/recycling-is-not-enough/>

reasons for this. The EPA is right to take a leading position that signals a policy and delivery model that is action-oriented and designed for continuous improvement and collaboration.

Plastics re-manufacturing and re-processing facilities are needed in NSW

The cost of recycling and disposal currently sits with councils (and ultimately their communities), which have no control over material use, design of products and packaging. Furthermore, there is a limited, if slowly growing, marketplace for secondary or off-take processing markets. Primary recyclers make profits over streams of plastic commodities, but competition and innovation may be lacking in many secondary remanufacturing sectors and geographies.

In soft plastics, the RedCycle market crash could be explained by an over-supply of inputs and limited processing infrastructure. It was a well-intentioned system without a transparent and regulated scheme behind it. It is one thing to collect recyclables, but every council and community should have trust and knowledge about how and where materials are treated.

Off-take markets for these wastes require clean streams for remanufacturing, and therefore primary recyclers should be required to (not volunteer to) find on-site solutions for separation and aggregation of unwanted resources, especially if they are recyclable. Instead of collectively passing the costs of contaminated mixed streams from primary recycler to secondary off-take markets, why not require separation of valuable plastics at the MRF and eliminate low-quality materials? Councils can only influence what is contractually agreed.

Litter enforcement and controls may be necessary

Enforcement may be required for small business such as convenience stores, fast food restaurants or shopping precincts to be more responsible for littered packaging. Mechanisms such as development approval or tenancy conditions that require staff to remove litter from a zone around the establishment (e.g. McDonalds staff to litter pick a 100m radius around the store).

Anti-litter education or communications on packaging or storefronts is admirable, but is unlikely to contribute towards disposal, recycling or littering targets. Unfortunately, like most communications and education mechanisms, measurability for effectiveness would also be a challenge.

Consumers are already confused

Consumers struggle to tell the difference between compostable, recyclable and biodegradable materials. In the food organics example, and with household food organics collections about to be a big part of councils' and community recycling efforts, the EPA has not yet acknowledged the critical importance that confusion plays in a cradle-to-cradle approach to generating quality compost. There are still products on the market that exacerbate this confusion, even though the organics composting market is desperate to shift markets all the way toward compostable liners.

A 'recyclability' approach for packaging and single use items could generate more confusion for consumers if they think the food organics stream will be an acceptable place for recyclable plastics disposal. Furthermore, SSROC recommends removing 'biodegradability'

or 'bio-plastics' claims and/or qualifications from the marketplace, as this can be used as a greenwashing term, or worse, could entrench poor recycling behaviours, most topically in the food organics stream.

SSROC recommends legislation to regulate the use of recyclability claims and symbols, including:

- Requiring compostable packaging to be comprised of only certified AS 4736 (industrially compostable) and AS 5810 (home compostable) standards.
- Prohibiting the use of greenwashing terminology, such as degradable and oxo-degradable, and associated symbols on consumer packaging to reduce consumer confusion.
- In NSW, certified liners could be labelled "FOGO friendly" or something similar, to reinforce understanding of acceptable materials in the FOGO bin.
- Economic incentives such as tax incentives linked to recycled content or penalties for packaging companies that continue to use virgin plastics and non-recyclable packaging would likely change packaging design and increase locally recycled content. For example, non-recyclable PVC drink bottles are still used by some companies for cordial and juice despite the level of contamination this creates downstream for higher value recyclable plastic.
- The National Plastics Plan 2024 estimated that 60% of the 3.5 million tonnes of plastics used by Australia in 2018-2019 was imported. This further illustrates the need for stronger regulation on imported packaging and the level of resources needed to implement strategies to reach these targets.

It is extremely important, however, that Australian-designed or manufactured products are not held to more stringent compliance or requirements than overseas brands and importers. This involves a broader consultation with port authorities, trade and commerce sections of Government.

Regarding the Proposed Actions beginning on page 12, SSROC and member councils offer the following comments.

1- Reduce Plastic Litter

Single use plastic cups – Actions 1-6:

SSROC is supportive of the intent of the first five actions to reduce single use plastic cups, and a proposed toolkit for reuse-only precincts. These precincts are likely to need considerable time and investment, and it is not clear how transferable the activities will be beyond precinct areas. To implement a state-wide strategy, SSROC suggests that pilots should be used to inform and educate the public, capture feasibility settings, and signal an eventual statewide ban or levy.

It is important that small businesses who would like to opt-in to delivering reuse-only operations are incentivised to change their operations with seed funding, small grants for

⁴ <https://www.environment.gov.au/system/files/resources/a327406c-79f5-47f1-b71b-7388407c35a0/files/national-plastics-plan-2021.pdf>

kitchen or floor equipment, and training for staff and education materials. More expansive roll-outs can be implemented through the findings of opt-in service providers and retailers.

Ahead of any reuse precinct pilot implementation or requirements, SSROC suggests a suite of social research and service design experiments should be implemented to understand customer and commercial/business behaviours, intentions and perceptions. Surveys, focus group sessions and policy co-design arrangements would go a long way toward building trust and exploring alternatives. NSW Procurement might assist in sourcing a panel of providers for small and large businesses, or even purchase the first year's supply of reusable cup stock. Large commercial landowners such as Westfields or Meriton could be engaged for early adoption.

If a well-funded, researched and long-term support program is not developed, reuse-only precincts will not be sustained. Support should include, at a minimum:

- funded and co-designed pilots in precincts
- small grants for kitchen stocking or washing equipment, stock replenishment etc
- toolkits that include information on food safety, business benefits (cost reduction, phase out of single use packaging), commercial benefits, and the purpose of change.
- opportunities for peak bodies, small businesses and land managers to co-design
- shopping centres, food courts and restaurant hubs to set up, procure and stock reusable cup and takeaway containers and reusable plates, bowls and mugs
- staff training materials, and education and promotion packets with co-branding available
- customer promotion materials on 'how to re-use'
- adjustment of kitchen or server processes, such as managing portion sizes for BYO reusable containers of various sizes.

SSROC suggests a good place to start would be government buildings, commercial high-rise, courthouses and other highly-frequented places of work. Stadiums and events, or shopping precincts could be piloted separately.

Regarding bring-your-own (BYO) cups and food containers, SSROC recognises that consumer-led options are extremely valuable and should not be sacrificed. But there are food and employee safety concerns to be addressed:

- Food venues should be educated, trained and incentivised to accept BYO reusable cups and reusable food containers for takeaway, and BYO cutlery and crockery for dine-in customers.
- Clear guidelines should be developed in consultation with Environmental Health inspectors, food venues, consumer groups and other industry representatives.
- Legal and compliance assistance in developing liability disclaimers for businesses, as well as clear guidelines for customers.

From a service design perspective, it will be important to incentivise small businesses to be early adopters with small grants and resource packages, and allow where possible the standardisation of reusable cups to include branding, bar codes or colour schemes. Strategically it will be important to understand whether this scheme is intended to be for takeaway users who are out and about, or whether users are expected to bulk store these cups at home.

Regarding exploration of Return and Earn to accept plastic cups for cold beverages, SSROC is supportive but cautious. More complex and consumer-dependent collection systems may not align with circular economy principles, especially for low value, single-use items. Furthermore, it is important to preserve the on-street amenity, safety and servicing and maintenance requirements for collection equipment such as reverse vending machines (RVMs). Councils need to know ahead of time whether cup receptacles are an add-on to existing RVMs, or new equipment is needed. Councils will be reluctant to broadly accept new infrastructure on public spaces. The same concerns with RVMs will need to be addressed, such as exempt/complying development, servicing and placement, on-street clutter, parking, queueing and scavenging.

From a probity standpoint, there is currently only one provider with these machine capabilities – by expanding the scope of Return and Earn technology capability, would NSW Government be enabling a single provider monopoly?

From an on-ground enforcement perspective, councils are not equipped, resourced or willing to enforce reuse-only precincts. Council may be supportive in principle and through promotions, but enforcement is required through legislative change.

Finally, there could be more cross-over with aspects of the Australian Recycling Label to reduce confusion in the public. For example, there is no stated action on hot coffee cups, and clear labelling is needed on non-recyclable takeaway plastics to avoid increased contamination of the comingled stream.

Single use plastic beverage bottle lids – Actions 1-2:

SSROC agrees with the introduction of tethered lids, provided a thorough assessment is taken of other countries' (such as Germany and Great Britain) experiences with the change. To preserve recycling markets, EPA should prioritise options where lids are made of the same material as the bottle where possible to avoid downstream contamination and community confusion. Tethering may reduce litter, but lids tend to be made of a different plastic thereby creating feedstock impurity issues for recyclers. This reinforces the need to move away from containers made of composite materials or mixed polymers. Former SSROC research with plastics recyclers⁵ indicated that recycled clear and light blue PET from bottles has high value where coloured PET has more limited end markets. If lids are tethered, they need to be made from the same polymer and the same colour as the bottle to maximise recycling potential. Incentives will be needed for brands, to make these kind of changes to their packaging as there are considerable cost and marketing implications for them.

User experience overseas⁶ and in Australia⁷ identifies that some tethered designs may function better than others. SSROC recommends the EPA is informed by user experience

⁵ See page 21 of SSROC's Research on Recovering More Kerbside Plastics at: https://ssroc.nsw.gov.au/wp-content/uploads/2020/08/200826_Think-Tank-3-Research-on-Recovering-Plastics-from-Kerbside-Recycling.pdf

⁶ <https://www.dailymail.co.uk/sciencetech/article-13425883/tethered-plastic-bottle-caps-furious-experts.html>

⁷ <https://theconversation.com/why-plastic-bottles-now-have-their-caps-attached-239886>

data and online feedback from consumer groups, plastic recyclers in Australia and European examples before generating design guidance.

Single use plastic food containers – Actions 1-3:

SSROC is strongly supportive of EPA's intentions to introduce a design standard for food containers and lids to make them recyclable – and in fact, we encourage EPA to go much further in this standard to include more non-organic takeaway, consumer goods and packaging to be fully recyclable, with eliminated, or at least reduced, use of composite materials.

However regarding an anti-littering label, SSROC is sceptical that this will have much impact. The EPA's own market research (OMD, 2024) revealed that people who litter most are not paying attention to their waste behaviour. Why would these people start paying attention to an anti-littering label? Historically, the EPA's [NSW Litter Prevention Kit \(2013\)](#) did not recommend the use of anti-littering labels. Instead, many of the factors contributing to litter were found to be environmental, social, accidental or lack of interest.

Single serve condiment packages – Actions 1-4:

SSROC supports the intention of the actions suggested, but they do not go far enough.

SSROC prefers to see an avoidance and reuse approach taken for single-use condiments, rather than a litter approach. This could include:

- Funded implementation support to phase out single use condiment packages, including tailored engagement programs for culturally and linguistically diverse restaurants and food venues to establish alternatives e.g. Japanese restaurants with engagement offered in Japanese and English about 'soy sauce fish', or hotels, restaurants and clubs' engagement to phase out single use jam, butter and sauce packages etc.
- Home delivery food venues and restaurants could be involved in phasing out condiment packages by providing alternatives, such as condiments added upon request, or providing self-serve bottles for dine-in customers.

One problem with single-serve condiment packages is their size and material type; even if recyclable, they are often too small to be captured by recycling machinery.

Furthermore, as above, we suggest anti-littering messages in shopfronts and packaging are likely to have little to no effectiveness, and would be almost impossible to evaluate.

Cigarette butts – Action 1:

SSROC recommends that the action "Collaborate with the Commonwealth Government and other Australian states and territories on a national approach to regulating cigarette butts" is expanded to include vapes as the [current vapes regulations](#) do not seem to cover safe disposal or reduction of litter related to vapes and other lithium-charged smoking devices.

This may be better resolved in separate legislation but vapes are largely ignored in NSW Government policy despite their recovery potential and design using dangerous materials.

2- Reducing harmful chemicals in plastics and microplastics

Removing harmful chemicals from food packaging – Actions 1-5:

SSROC supports all actions. Action 5 proposes to work with the Commonwealth Government and industry to mandate the certification and labelling scheme and identify compliance procedures. A certification scheme should be underpinned by and aligned with international standards and global pacts to reduce overall plastics production and consumption.

SSROC supports the Local Government NSW note that greater care must be taken over additives such as pro-degradants, which can rot down plastics into smaller pieces.

Plastic microfibres released by washing synthetic textiles – Action 1:

Fast fashion accounts for a high share of microfibre release as those garments often contain synthetic fibres, which are released at their highest frequency and volume during first washes. Considering fast fashion's relatively short lifecycle, the EPA's focus on capturing microfibres in the home is good, but may simply redistribute the microfibre problem from wastewater to disposal, rather than reducing it.

SSROC proposes stronger action through design standards, subsidies or tax relief for increased use of natural fibres or the proven reduction of polyfibres. The EPA should engage textile peak bodies, the supply chain and Seamless to incorporate more sustainable and recyclable design principles.

The microfibre issue is not well understood in the community, and SSROC therefore recommends a substantial education and awareness campaign, potentially co-branded and supported by industry and product stewardship bodies.

3- Keeping pace on plastics action

Heavyweight plastic film shopping bags – Actions 1-4:

As above, SSROC supports action to increase and potentially mandate recycled content in statewide sourcing, purchasing and distribution of many plastic products, including heavy weight plastic film shopping bags. The EPA could take stronger action on plastic bags to change consumer behaviour and preferences:

- Reusable grocery and shopping bags for purchase could be made locally from heavyweight natural fibres and recycled at end of life. Jute, hemp and cotton are cost effective materials, and chemical water-resistance additives or laminated linings could be phased-out or eliminated.
- Single use plastic bags could be made more expensive to dis-incentivise purchase, and encourage BYO reusable bags.
- Heavy weight plastic bags could be returned to stores for recycling at end of life.

- Supermarkets could set aside cardboard packing boxes for customers to reuse free of charge to carry groceries (similar to Harris Farm, Bunnings and Dan Murphy's).

Plastic barrier bags – Actions 1-3:

SSROC commends the QLD Government example to ban plastic shopping bags >35microns.

NSW should go further and require that groceries only stock certified compostable barrier bags at >20 microns, and phase out non-compostable options altogether both in the produce section but also on the shelves. Twenty (20) microns is the thickness that has received the best FOGO/FO contamination reduction as caddy liners. Why not take the WA and QLD example and offer NSW residents the dual benefit of compostable produce bags that double as a compostable caddy liner? This would reduce the need for council-supplied FOGO liners.

The EPA could support supermarkets to switch from plastic barrier bags to paper or compostable plastic bags (e.g. mushroom bags) in the supermarket grocery section for all produce and nuts. Consumers may also be encouraged to bring their own reusable produce bags.

It is important to follow a range of perspectives and user experiences around barrier bags. The Plastics Plan does not reference any evidence to support the argument from the Australian Retailers Association that a phase out of barrier bags will increase food waste – but this is an important consideration, and independent studies are needed.

Expanded plastic packaging – Action 1:

SSROC is interested in seeing a phase-out of all food trays and packaging made from expanded and foamed plastic. To our knowledge there is no known benefit to expanded polystyrene (EPS) food containers that cannot be achieved with more sustainable and recyclable materials.

The EPA could expand the proposed action to include expanded polystyrene cups and meat trays.

Fruit stickers – Action 1:

SSROC supports and prioritises a phase-out and ban on all fruit stickers, since that they are one of the primary causes of physical and chemical contamination in FOGO/FO streams. As a second priority, we recommend the EPA define in the proposed action that if fruit stickers are necessary at all, they are required to be certified compostable to the Australian Standard 4736-2006 (for commercial composting), although SSROC understands that even compostable stickers slow down the maturation of compost.

Other comments:

Absence of clear actions on soft plastics:

- Litter data and secondary recycling markets show that big impacts could be realised with more action on soft plastics.
- Actions on several soft plastic items are included in the plan. However, there is little clarity on NSW's push for soft plastic recycling in NSW.
- [NSW litter data from 2022-23](#) states that "Confectionery wrappers (15%) were found to be the most-littered item, followed by straws (10%)." These wrappers are typically made from soft plastics.
- Councils need to be updated on the progress of soft plastics recycling by the taskforce (Coles, Woolworths, ALDI and the Government).
- PVC food trays (such as trays used for sushi, bakery and deli items in supermarkets) and PVC bottles should be phased out as they contaminate downstream recycling markets.

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.



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