

**INQUIRY INTO WASTE AVOIDANCE AND RESOURCE
RECOVERY AMENDMENT (PLASTICS REDUCTION)
BILL 2021**

Organisation: City of Sydney Council
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The Director
Portfolio Committee 7
Parliament House
Macquarie Street
Sydney NSW 2000

By email: PortfolioCommittee7@parliament.nsw.gov.au

To Whom it May Concern,

**City of Sydney Response to Inquiry: Waste Avoidance and Resource Recovery
Amendment (Plastics Reduction) Bill 2021**

The City welcomes the opportunity to comment on the Committee's inquiry into the Waste Avoidance and Resource Recovery Amendment (Plastics Reduction) Bill 2021 and we strongly support the intent of the Bill. The City is committed to environmental leadership and has zero waste as a target of our 2017 *Leave Nothing to Waste*¹ strategy and action plan. The reduction of waste to landfill also forms a key part of being a net zero council by 2040².

Our organisation

The Council of the City of Sydney (the City) local area is one of the largest and fastest growing local areas in Australia, with an estimated resident population of 246,000 and estimated to grow to 320,000 by 2031. There are over 23,500 separate business establishments in our local area and up to 500,000 people work in our local area every day.

Activity in our local government area produces more than 5,500 tonnes of waste every day, of which the City directly manages less than 10 per cent. We estimate that around 63 per cent of total waste produced is already recycled, but this means more than 2,000 tonnes still goes to landfill each day, with no further opportunity for reuse, recycling or recovery.

In the absence of state government legislation that responds to the increasing volumes of single use plastics in our waste stream the City published guidelines³ in 2019 for staff, contractors and event organisers to find more sustainable alternatives to single use items and how to ensure that where waste is generated, recycling is maximised. In May

¹ <https://www.cityofsydney.nsw.gov.au/strategies-action-plans/leave-nothing-to-waste-waste-strategy-action-plan-2017-2030>

² <https://news.cityofsydney.nsw.gov.au/articles/net-zero-by-2040-city-of-sydney-ambitious-new-carbon-emissions-target-set#:~:text=We've%20brought%20forward%20our,than%20the%20existing%20050%20deadline>

³ <https://www.cityofsydney.nsw.gov.au/guides/reducing-waste-events-services-single-use-items>

of the same year the City also launched its eliminating single use pledge⁴ to demonstrate our commitment in this space and to invite businesses in our local government area to join us in reducing plastic waste. More than sixty businesses in the local government area have signed the pledge.

Response to terms of reference

The City strongly supports the intent of the Waste Avoidance and Resource Recovery Amendment (Plastics Reduction) Bill 2021 however, we believe there are several considerations to be made to facilitate a successful implementation.

In response to the terms of reference⁵ the City would like to provide the following comments for consideration by the Committee:

- a) Adequate time is required to implement change and alternatives will need to be sourced. In 2020 the federal government announced that from July 2021 exports of waste glass, plastics, tyres, and paper and cardboard would be regulated⁶ and committed \$190 million of investment through states and territories to delivery infrastructure⁷. While the City welcomes this move by the federal government, the timescales to deliver such processing capacity at scale, particularly for metropolitan Sydney are likely to be longer⁸ and the risk is that in the short to medium term materials will be landfilled and public confidence in recycling services may be impacted.
- b) Funding is required to achieve waste reduction targets. Whilst the federal government investment is valuable in providing seed funding for processing capacity, investment will also be required to develop the necessary collection and transfer infrastructure, particularly in the Sydney Metropolitan Area where there is an ever-shrinking number of waste and recycling operators. A situational analysis⁹ completed for NSW EPA in the development of the forthcoming 20 Year Waste Strategy stated that consolidation of the waste industry is impacting on the level of competition in the market and creating issues with access to waste infrastructure. The lack of competition and reduced access to infrastructure could result in increased costs for businesses and residents or reduced services.
- c) Expansion of priority materials to include e-waste and textiles. In addition to consumer packaging and single use items the City requests that the Committee considers the timely expansion of the Bill to include e-waste and textiles. Together these two waste streams represent up to 10% of our weekly residential waste bins and typically plastic accounts for between 20% and up to 70% of e-waste and textiles respectively^{10,11}. Due to the more difficult nature of extracting reusable and recyclable materials from both e-waste and textiles the collection infrastructure and reprocessing capacity in Australia is still in its infancy despite these waste streams having been identified as growing problem waste streams.

⁴ <https://www.sustainabledestinationpartnership.com.au/projects/single-use-items>

⁵ <https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2709#tab-termsofreference>

⁶ <https://www.environment.gov.au/protection/waste/exports>

⁷ <https://www.environment.gov.au/protection/waste/how-we-manage-waste/recycling-modernisation-fund>

⁸ <https://www.nsw.gov.au/sites/default/files/2020-04/Situational-Analysis.pdf>

⁹ <https://www.nsw.gov.au/sites/default/files/2020-04/Situational-Analysis.pdf>

¹⁰ https://www.governmentnews.com.au/type_contributors/turning-a-growing-problem-into-a-growing-opportunity/

¹¹ <https://publications.lib.chalmers.se/records/fulltext/175356/175356.pdf>

- d) Infrastructure needs for alternatives. Compostable packaging items have been heralded as the solution to single use plastics, however in order to minimise their impact on the environment compostable items should be separately collected and go to a composting facility. Many existing collection and recycling systems are designed for traditional packaging materials such as PET and other rigid plastics, glass, metals and paper. Collection infrastructure and processing capacity will need to be created or updated to accommodate compostable and education for consumers will need to be delivered at scale.
- e) Regulation of the Act. It is unclear at this stage how the proposed bans on single use materials might be regulated and enforced, whether by NSW EPA or Local Government. Regulation of single use breaches are likely to be time consuming to prosecute and those given the powers would require the necessary resource capacity to enforce bans.
- f) Transparency of data. In order to demonstrate achievement of the targets there will be a requirement for improved data transparency from the commercial sector. The Australian Packaging Covenant Organisation (APCO) have managed to establish a good baseline of data from research on single use plastics¹² but much of the raw data is commercial in confidence and relies on information being provided voluntarily and is aggregated so validation of actual plastics reduction etc may be difficult to prove.

Recommendations

The City would encourage and support the following actions by the NSW Government in delivering the amendment to the Bill:

- Aligning dates of recycling targets with known or likely delivery of processing capacity.
- Include in the legislation the requirement for funding of collection and transfer infrastructure and assigning responsibility for delivery.
- Provide further details on responsible bodies and funding for enforcement of the regulations.
- Consider expansion of the target materials for recycling to include e-waste and textiles.

Should you wish to speak with a Council officer about this response, please contact Gemma Dawson, Manager Waste Strategy on _____ or at _____

Yours sincerely

Monica Barone
Chief Executive Officer

¹² <https://documents.packagingcovenant.org.au/public-documents/Action%20Plan%20for%20Problematic%20and%20Unnecessary%20Single-Use%20Plastic%20Packaging>

