

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

Organisation: Southern Sydney Regional Organisation of Councils
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Southern Sydney Regional Organisation of Councils

Submission on the Waste Avoidance and Resource Recovery Amendment (Plastics Reduction) Bill 2021

**Submitted to the NSW Legislative Council's Portfolio Committee No. 7 –
Planning and Environment via email to
PortfolioCommittee7@parliament.nsw.gov.au**

Introduction

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of 11 councils spanning Sydney's southern suburbs, eastern suburbs, CBD, and inner west and covering a third of the Greater Sydney's population, or 1.7m people. Our Councils manage around 655,000 tonnes of household waste each year; which is about 20% 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, transport, procurement, waste, and planning.

This submission

SSROC supports in principle the Waste Avoidance and Resource Recovery (WARR) Amendment (Plastics Reduction) Bill 2021, which includes ambitious targets to reduce single use plastics and plastic pollution and proposes the creation of the Plastics Reduction Commission.

However, SSROC has concerns about how those targets will be monitored, funded and delivered when there is little regulation over the production of plastic packaging domestically and overseas, inadequate infrastructure in NSW to sort, process and recover that plastic and no standardisation of waste data across NSW. More detailed consultation is also needed with industry to ensure that the targets and proposed amendments to the WARR Act 2001 do not have any perverse recovery outcomes.

In this submission, SSROC has provided feedback on the targets and amendments to the Bill, the establishment of the Plastics Reduction Commission and on the legislative and funding barriers that need to be addressed to achieve these targets. As councils are responsible for the kerbside collection of waste and recycling, they are a critical part of the supply chain in recovering plastic packaging and will need to be further consulted by the Plastics Reduction Commission on the development of strategies and funding to achieve these targets.

Funding and legislative changes needed to reach proposed targets

A significant funding commitment is needed from the NSW Government to implement strategies to achieve the targets identified in the Waste Avoidance and Resource Recovery (WARR) Amendment (Plastics Reduction) Bill 2021 (referred in this submission as the Bill). Funding is particularly needed at the design stage of plastic packaging (to implement a phase-out of plastic packaging that is difficult to recycle) and at the collection and recovery stages through product and packaging stewardship (such as the [Nestlé/Curbcycle/Licella partnership](#)); and for investment in recycling and remanufacturing infrastructure and end markets for recycled plastic.

Currently, the recovery of plastic packaging is severely hindered by:

1. Significant data gaps on material flows and limited access to processing, reprocessing and remanufacturing data.
2. Consumer confusion about proper recycling, as underscored by a 2020 national audit commissioned by the Australian Council of Recyclers. The audit highlighted that inconsistent labelling is creating confusion, which leads to higher kerbside contamination and ultimately poorer quality materials for use in secondary manufacturing.
- Inadequate funding and planning for recovery infrastructure in NSW, particularly in the Sydney metro area.

In NSW, only 11.5% of the waste levy collected in the 2018-2019 financial year was reinvested back into the waste and resource recovery sector (compared to 66% in Victoria and 50% in South

Australia); yet the waste levy has increased by 148% over the last ten years, and Waste Less Recycle More funding has decreased by 43% over the last eight years. IPART has also indicated that NSW Government investment in the WARR sector would stimulate much-needed competition and jobs, and that waste levy revenue must be transparent.

This proposed Amendment to the Waste Avoidance and Resource Recovery (WARR) Act 2001 presents a valuable opportunity for the NSW Government to go further than the stated targets and amend the WARR Act to mandate full hypothecation of revenue raised from the waste levy back into the waste and resource recovery sector. This would help secure some of the funding desperately needed to achieve the targets.

The WARR Act could be amended to include a fixed percentage of waste levy income to be collected in a separate ring-fenced fund (similar to South Australia) and applied specifically to resource recovery and waste minimisation projects. This could be used to fund the Plastics Reduction Commission. As well as funding waste minimisation projects including plastic reduction, a portion of this fixed percentage or indeed a separate allocation would also need to be dedicated to local councils who play a critical role in the collection of kerbside recycling and plastic reduction. Guidelines and/or criteria should be developed which direct how this funding should be applied and assist those who may wish to apply for grants. The NSW Auditor-General report, *Waste levy and grants for waste infrastructure*, tabled in NSW Parliament on 26 November 2020, found that modelling to test optimal waste levy settings is long overdue and that the levy should be regularly reviewed to ensure that it is optimally geared to encourage its policy objective of waste minimisation and resource recovery.

To reach the proposed targets, other significant legislative barriers need to be addressed to support the use of recycled plastic materials, including:

1. Encourage the use of recycled materials and provide certainty for suppliers and consumers by updating the definition of “waste” in the Protection of the Environment Operations Act 1997 (POEO Act) to clearly distinguish between “waste” and “resources”. This would significantly de-risk the use of waste-derived resources and technologies, and enable manufacturing, fuel jobs, attract investment, and drive technological innovation. The NSW Government could consider elements of Queensland’s End of Waste Framework¹.
2. An example of how the outdated definition of waste is holding back recovery rates and driving investment out of NSW is Licella’s catalytic hydrothermal reactor (CAT-HTR) technology². The technology recycles waste plastic back into crude oil that can then be fractionated for a range of uses, including diesel, ethylene (used to make polyethylene such as Kit Kat wrappers), and bitumen. This is one of the most promising technologies for maximising resource recovery from low-grade mixed plastics. However, as this plastic-derived crude oil remains characterised as waste in NSW, the product is subject to onerous record-keeping and transport requirements and cannot even be piloted without an expensive resource recovery order and exemption. After spending millions of dollars and several years without progress in NSW, it is no longer feasible for Licella to operate in NSW. Victoria has included chemical processing of plastics in its infrastructure planning, and Licella has relocated its reactor there.

¹ End of Waste Framework: https://environment.des.qd.gov.au/_data/assets/pdf_file/0029/85790/wr-eow-gu_de_ne.pdf

² Licella: <https://www.licella.com.au/cat-htr/>

3. Support a flexible, fair, transparent and fit-for-purpose regulatory framework for emerging technologies and the productive use of recycled product by updating the resource recovery order and exemption model, including
 - a) Amending the POEO Act to ensure that only producers – not consumers (including government procurers) – are liable for compliance of recovered product and that consumers can rely on certificates of compliance from producers. In the 2019 Grafil case³, the Court of Criminal Appeal made it clear that a consumer of a recovered product may breach a resource recovery exemption if the producer from which the recovered product is sourced has failed to comply with the terms of a corresponding resource recovery order. In other words, consumers may commit offences under the POEO Act, and assume responsibility for clean-up costs, because of a failure on the part of the producer. In comparison, under the End of Waste Framework, it is the registered resource producer's responsibility to ensure that the resource meets the specified criteria and quality characteristics prior to supplying the resource to the user for approved use. This poses a significant risk to purchasers of remanufactured materials, including in government procurements.
 - b) Inserting a new division in the POEO (Waste) Regulation 2014 introducing appeal rights, as is already permitted in section 291 of the POEO Act, and timeframes for order and exemption development, approval, review and revocation.
 - c) Introducing a periodic review mechanism.
 - d) Encouraging new and emerging technologies by introducing a fast-track or streamlined approval process for pilot projects. This would benefit emerging technologies such as Licella's CAT-HTR and others.

SSROC also recommends including additional legislation to regulate the use of recyclability claims and symbols including;

- Mandate a uniform recycling label such as the Australasian Recycling Label (ARL).
- Require compostable packaging to use only certified industrially compostable and home compostable packaging materials to AS 4736 (industrially compostable) and AS 5810 (home compostable).
- Prohibit the use of greenwashing terminology, such as degradable and oxo-degradable, and associated symbols on consumer packaging to reduce consumer confusion.

Targets identified in the WARR Amendment (Plastics Reduction) Bill 2021

SSROC's specific feedback on each of the plastic elimination targets identified in the Bill is detailed below each target.

(i) Reducing the amount of plastic waste by 90%, from 2019 levels, by the end of 2022

Whilst SSROC supports a highly ambitious target for plastic waste, achieving a 90% reduction on 2019 levels within a year of this Bill being passed is unrealistic given the level of change needed to the design of plastic packaging, the current capacity of infrastructure in Australia to remanufacture or recycle post-consumer plastic, and as yet limited demand and options for products with recycled content.

SSROC recommends changing this to a more realistic timeframe given that major changes will be needed by packaging companies to ensure that their packaging can be recycled within Australia in order to meet this target. In 2018-19, research from the Australian Packaging Covenant

³ Grafil case: <https://www.nswcourts.gov.au/judgments/2019/08/20/nsw-court-of-criminal-appeal-judge-ang-on-asbestos-waste-case-expansion/>

Organisation (APCO)⁴ indicated that only 6.1% of plastic packaging was recovered and estimated that 34% of plastic packaging has poor recyclability due to bad design, illustrating the extreme difficulty in meeting this target. Even with fully implemented bans on all single-use plastics, without alternative waste treatment such as energy from waste, SSROC does not see a clear path for achieving this target.

Economic incentives such as tax incentives linked to recycled content or penalties for packaging companies that continue to use non-recyclable packaging would likely be effective mechanisms to change packaging design and materials 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 and despite advocacy efforts by organisations like APCO.

The National Plastics Plan 2021⁵ 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.

(ii) Eliminating plastic resin pellets used in industrial processes from matter that is discharged or deposited into the environment by the end of 2022

This target should be expanded to include plastic flakes as both pellets and flakes are commonly used in plastic manufacturing and remanufacturing. SSROC recommends consulting with plastic manufacturers and recyclers (e.g. through an association like the [Plastics Industry Manufacturers of Australia – PIMA](#)) to understand how this target could be implemented, the cost implications, and to ensure there are no perverse outcomes. This target could be further strengthened if it could also include restrictions on how plastic pellets and flakes are stored and transported overseas to reduce the risk of major pollution events (e.g. 150 metric tonnes of plastic pellets entered the sea following a typhoon in Hong Kong in 2012⁶).

(iii) Ensuring that, by the end of 2024, all new washing machines are fitted with a lint filter that is capable of trapping microplastics and microfibres that are loosened during the laundering of synthetic fabrics

This target would need to be supported by consumer education on how to empty and maintain the filter. When consulting with washing machine manufacturers it would be important to ask if there is a way to cost-effectively retrofit lint filters on older machines to encourage consumers to repair rather than replace washing machines that currently have no product stewardship scheme and are difficult to recycle.

(iv) Ensuring that, by the end of 2024, all packaging used in the State is recyclable, compostable or reusable

SSROC recommends aligning NSW and national targets and dates to avoid confusion. The NSW target is similar to the national packaging target for 100% of packaging to be recyclable, compostable or reusable, but the national target is by 2025.⁷

In addition to funding and guidance on packaging design, materials, and formats, SSROC also recommends additional legislation to: regulate the use of recyclability claims and symbols;

⁴ APCO: Australian Packaging Covenant and Recycling Data 2018-19, January 2021. See:

<https://documents.packagingcovenant.org.au/public-documents/Australian%20Packaging%20Consumption%20And%20Recycling%20Data%202018-19>

⁵ <https://www.environment.gov.au/system/files/resources/a327406c-79f5-47f1-b71b-7388407c35a0/files/national-packaging-targets-2021.pdf>

⁶ See: <https://www.reuters.com/article/us-hongkong-spill-dUSBRE87306J20120805>

⁷ See: <https://apco.org.au/national-packaging-targets>

mandate a uniform recycling label such as the Australasian Recycling Label (ARL); require packaging to use only certified industrially compostable and home compostable packaging materials to AS 4736 (industrially compostable) and AS 5810 (home compostable), respectively; and prohibit the use of greenwashing terminology, such as degradable and oxo-degradable, and associated symbols on consumer packaging to reduce consumer confusion. Whether on a state or national level, packaging design and labelling is one of the most significant opportunities for leadership and change.

(v) Ensuring that, by the end of 2024, all packaging used in the State is comprised of at least 30% recycled plastic

This target must be more specific to domestic supply chains and align across all states and territories. Both the NSW and national target should specify at least 50% recycled plastic made from Australian-sourced feedstock and all packaging should be able to be repeatedly recycled. In addition to financial incentives for using recycled content, this target is important to create a pull market for recycled plastic – if the target specifies that recycled plastic should be sourced from within Australia. Otherwise, it could lead to an increase in imported recycled plastic pellets or flakes and undermine the market for Australian-recycled plastic.

To meet this target, plastic processing and recycling infrastructure development must be accelerated in Australia, especially in NSW, and strategies such as packaging stewardship are needed to reduce contamination, improve quality, and increase the value of recycled plastic.

Targets aligned across all states and territories will provide clearer guidance to brand owners and packaging manufacturers, support more consistent packaging design improvements, and be more conducive to creating cost-efficient economies of scale for a design, manufacturing, and infrastructural investment.

(vi) Eliminating types of plastic waste listed in the table to the proposed section from matter that is discharged or deposited into the environment by the date or period specified.

This target is not specific enough. In principle, SSROC supports most types of plastic waste put forward for elimination, provided these changes are accompanied by funded implementation plans and education campaigns. Further clarification is outlined in comments in the table below.

Elimination target date	3 months after the date on which this Part commences
Type of plastic waste	SSROC comments
Single-use plastic bags	Support, but ensure single-use plastic bags are phased out for retailers of all sizes.
Oxo-degradable plastic	Support.
Cosmetics, personal hygiene products or household detergents containing microbeads	Support.
Plastic waste prescribed by the regulations under section 48E (Note 48D definitions in the Bill list these plastic waste types as single use plastic bags, cutlery, straws, disposable plastic cups and coffee cups and lids, polystyrene food and beverage	Support, with the exception of polyethylene, which requires clarification as it is not clear in the Bill which type of polyethylene packaging or products are being targeted. Clear and translucent high-density polyethylene (HDPE) containers used for milk and juice can be recycled easily in NSW, but there are many coloured types of HDPE which are much harder to find

containers, packaging that is made from polystyrene or polyethylene).	<p>markets for⁸ and low-density polyethylene (LDPE) bags and plastic wrap can contaminate household recycling and are used in large amounts in agricultural wrap.</p> <p>Phasing out the other types of plastic waste listed within the short timeframe will be extremely difficult without a well-funded implementation plan that targets retail outlets and provides economic incentives to change.</p>
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Elimination target date	6 months after the date on which this Part commences
Type of plastic waste	SSROC comments
Plastic drinking straws	Support, and acknowledge that the Bill has made provisions for medical uses for people with disabilities.
Plastic drink stirrers	Support.
Balloons containing plastic	Support, but some affordable and sustainable alternative options may be needed. Companies switching to refillable foil balloons (made of nylon and foil) or latex for example may create another difficult litter item. Balloon straws, plastic confetti and glitter could all be included in this amendment, as they are all difficult litter items and typically sold by the same companies selling balloon and single-use plastic tablecloths. There is an opportunity to create a consistent message about plastic litter typically used in celebratory events.
Plastic ring carriers for beverage containers	Support, but consideration is needed on whether this has implications for the storage and longevity of beverages to avoid spoilage.
Confection sticks	Support but this term should be more clearly defined to explain whether it refers to plastic lollypop and ice cream sticks. If so, alternative wooden options are available.
Reusable plastic bags	This needs clarification and definition in the Bill under 48B definitions, to specify what is meant by “reusable plastic bags”. SSROC supports a phase-out of heavier-gauge single-use plastic bags sometimes referred to as ‘boutique’ bags as alternatives are available. Heavier-gauge polyethylene reusable bags that supermarkets sell, and consumers bring with them for shopping would require further consideration of the lifecycle and costs of available alternatives.
Single-use expanded polystyrene food and beverage containers	Support, as polystyrene food and beverage containers cannot be recycled at most material recovery facilities and contaminate the recovery of other higher value plastics. As they are lightweight, they also contribute to plastic pollution. Alternatives to EPS are available and should be required instead.

⁸ SSROC, NSW C rcu ar and UNSW SMaRT Centre *Research on Recovering More Kerbside Plastics* August 2019. Visit: https://ssroc.nsw.gov.au/wp-content/uploads/2020/08/200826_Think-Tank-3-Research-on-Recovering-Plastics-from-Kerbside-Recycling.pdf

Plastic cotton buds	Support, as alternatives are available.
Plastic takeaway sauce containers	Support, but this significant change requires a well-funded consumer, retail and hospitality education campaign.
Plastic fruit and vegetable packaging	This should be defined in the Bill under 48B definitions, so it is clear what this includes. Plastic fruit and vegetable barrier bags, netting, polystyrene trays, and cling wrap should be phased out.
Plastic newspaper and magazine packaging	Support, as this is a major contaminant in household recycling and reduces recovery.
Single-use plastic tablecloths	Support, as alternatives are available.

Elimination target date	18 months after the date on which this Part commences
Type of plastic waste	SSROC comments
Single-use plastic cutlery	Support, as alternatives are available.
Non-compostable cigarettes	Support, this is particularly needed for cigarette filters. A recent microplastics litter audit at Bondi Beach ⁹ showed filters and even tiny menthol balls used in filters from menthol cigarettes were litter items.
Polystyrene packaging	Support, alternatives may need to be subsidised to ensure uptake.
Plastic takeaway food containers, other than plastic takeaway sauce containers	Support in principle, but this needs further consideration as reusable takeaway containers are more expensive and not suited to all applications e.g. events, hospitals and vehicle or plane trips. More research and an implementation strategy is needed.
Polystyrene waffle pods used in construction	The Plastics Reduction Commission should consider if an exception should be made for recycled polystyrene waffle pods with a strategy for end-of-life recovery.

Elimination target date	3 years after the date on which this Part commences
Type of plastic waste	SSROC comments
Non-recyclable and non-compostable beverage containers	This needs to include all PVC food and beverage containers (currently used in drink containers and food trays). SSROC recently undertook research with councils, MRFs, plastics recyclers and manufacturers, which revealed a broad consensus that PVC in food and beverage packaging needs to be phased out as it contaminates the mix and poses additional safety risks. ¹⁰ This research also identified that plastic beverage lids must be standardised (e.g. some beverages use HDPE bottle lids and

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https://www.waverley.nsw.gov.au/top_navigation/pages/news_and_media/council_news/news/waverley_council_ons_fight_against_microplastics

¹⁰ SSROC, NSW Council and UNSW SMaRT Centre *Research on Recovering More Kerbside Plastics* August 2019. Visit: https://ssroc.nsw.gov.au/wp-content/uploads/2020/08/200826_Think-Tank-3-Research-on-Recovering-Plastics-from-Kerbside-Recycling.pdf

	others polypropylene (PP), this creates contamination issues as the different polymers are harder to separate for recovery and manufacturers typically prefer to purchase single recycled polymers (rather than a mix). Further consultation with MRFs, plastic recycler and manufacturers would help identify what other types of plastic beverage containers and lids are difficult to recycle.
All petroleum-based single-use plastics	<p>This applies to so many types of packaging and products that it needs to be more clearly defined in section 48D of the Bill. Consideration is also needed on how this might affect current uses of recycled plastic on the market.</p> <p>This table of priority materials should be expanded to also include electronic waste and synthetic (plastic-derived) textiles because together these two waste streams represent up to 10% of SSROC councils weekly residential waste bins and typically plastic accounts for between 20% and up to 70% of e-waste and textiles respectively¹¹.</p>

Plastics Reduction Commission

SSROC supports the creation of the Plastics Reduction Commission to work with industry to reduce single-use plastics and plastic pollution from the environment. The Bill gives the Plastics Reduction Commission the responsibility *to conduct inquiries and prepare reports on the management of plastic waste, mechanisms to reduce plastics pollution and compliance with the plastics elimination targets and to prepare a threat abatement plan in relation to plastics pollution.*

An appropriate level of funding and staffing resources should be allocated to undertake research, stakeholder consultation, establishing the protocol for data (given the lack of coordinated data on plastic consumption, pollution and recovery) and enforcement, and developing a threat abatement plan strategy.

Section 48P of the Bill also states that the Commission will undertake audits of government and industry compliance with the plastics elimination targets and recommend appropriate actions, including plastic waste reduction plans. Consulting and potentially auditing the many different sectors involved in the production, processing and recovery of both virgin and recycled plastic is a huge undertaking that will require considerable investment, staffing resources, time, and a detailed implementation plan.

SSROC recommends that at a minimum this stakeholder consultation should include representation from companies in the supply chain (e.g. packaging companies, local government, material recovery facilities, plastic recyclers, plastic compounders, plastic manufacturers and other waste processors); associations representing different sectors involved in the supply chain (e.g. APCO, Local Government NSW, Waste Management and Resource Recovery Australia, Waste Contractors and Recycling Association of NSW, the Australasian Bioplastics Association, and Plastics Industry Manufacturers of Australia); and research institutions like the CSIRO, NSW Circular and universities such as UNSW working on research and technologies to reduce plastic.

¹¹ https://www.governmentnews.com.au/type_contrbutors/turn ng-a-grow ng-prob em- nto-a-grow ng-opportun ty/

As part of this consultation with stakeholders, the Plastic Reduction Commission will need to clarify how this Bill will align with other targets in recent national and state legislation, policies and plans to reduce plastic, including the:

- [Product Stewardship Amendment \(Packaging and Plastics\) Bill 2019](#)
- [National Waste Policy Action Plan 2019 and National Packaging Targets](#)
- [NSW Plastics Plan Discussion Paper 2020](#)
- [Recycling and Waste Reduction Act 2020](#)
- [National Plastics Plan 2021.](#)

There are very difficult existing challenges in compiling data related to these targets and making it publicly available. The lack of a coordinated and well-resourced approach to waste and recovery data hinders the ability of all levels of government to meet and track progress towards targets and to transparently manage waste and recycling from the point of household kerbside collection to recovery or disposal. This in turn has flow-on effects on consumer confidence in recycling and community participation in plastic reduction initiatives. SSROC recommends the Plastics Reduction Commission work with other organisations including APCO on the national harmonisation of waste data in order to monitor compliance with these targets.

Key Recommendations:

In summary, SSROC's recommendations for this Bill include:

1. Using this valuable opportunity to also amend the WARR Act to mandate full hypothecation of waste levy revenue back into the waste and resource recovery sector.
2. Encouraging the use of recycled materials and providing certainty for suppliers and consumers by updating the definition of "waste" in the POEO Act to clearly distinguish between "waste" and "resources".
3. Providing a substantial and adequate funding package and implementation plan to accelerate the infrastructure needed to collect, process and recover plastic waste to help deliver these targets.
4. Supporting these changes with incentives, penalties and education campaigns to ensure they are realised within the short timeframes identified, since eliminating these plastics is a monumental task that relies on substantial changes by manufacturers, retailers and consumers.
5. Providing economic incentives for packaging companies to design for recyclability and to phase out plastic packaging that is difficult to recycle, and ensuring that the relevant government agencies have the resources to regulate and to penalise companies that do not comply with these targets after a reasonable period of consultation and engagement.
6. Passing additional legislation to regulate the use of recyclability claims and symbols; mandating a uniform recycling label such as the Australasian Recycling Label (ARL); requiring packaging to use only certified industrially compostable and home compostable packaging materials to AS 4736 (industrially compostable) and AS 5810 (home compostable), respectively; and prohibit the use of greenwashing terminology, such as degradable and oxo-degradable, and associated symbols on consumer packaging to mitigate consumer confusion.
7. Expanding the list of plastic wastes to be eliminated in the Bill to include:
 - PVC food and beverage containers;

- Plastic balloon sticks, glitter and confetti;
 - Electronic waste and synthetic textiles (as plastic accounts for between 20% and up to 70% of e-waste and textiles respectively¹²).
8. Providing economic incentives to increase the use of recycled materials in order to create end markets and stimulate investment in reprocessing capacity.
 9. Ensuring that the Plastics Reduction Commission has adequate resources and the authority needed to undertake the required consultation, data collection, auditing, planning and reporting to work with industry to implement and achieve targets.
 10. Align targets in this Bill with other plastic reduction targets in NSW and other states and territories to avoid confusion and enable cost-efficient economies of scale for the design, manufacturing, and infrastructural investment needed to meet these targets.

Thank you for the opportunity to provide feedback on the WARR Amendment (Plastic Reduction) Bill. Without addressing the major legislative and regulatory barriers in the WARR and POEO acts, these targets will remain out of reach and NSW will miss out on the latent efficiencies and investment enabling economic growth and fuelling new industries in NSW and across Australia. We hope further engagement with key stakeholders and the adoption of this Bill will help support NSW's transition to a circular economy and galvanise all sectors to reduce plastic pollution.

In order to make this submission within the timeframe for receiving comments, it has not been possible for it to be reviewed by councils or to be endorsed by SSROC delegates. I will contact you further if any issues arise as it is reviewed.

For any enquiries, please contact me or our Strategic Lead Resource Recovery, Justin Bonsey on or email

Yours faithfully,

Helen Sloan
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¹² https://www.governmentnews.com.au/type_contrbutors/turn ng-a-grow ng-prob em- nto-a-grow ng-opportun ty/