Advocating for the people of Western Sydney

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Response to *NSW Plastics: The Way Forward*

A submission to the NSW Environment Protection Authority

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About WSROC.

Formed in 1973, the Western Sydney Regional Organisation of Councils (WSROC), represents local government across Greater Western Sydney.

With a reputation for considered policy analysis and bipartisan advocacy, WSROC's primary role is to represent the councils and communities of Greater Western Sydney as well as developing resource sharing and other co-operative projects between Greater Western Sydney councils.

Over the past 50 years WSROC has developed a strong reputation for bi-partisan advocacy, especially in the key areas of economic and social development, job creation, transport and infrastructure, planning, health and the environment, and has proven itself a reliable partner in intergovernmental relations, regional strategic planning, and coordinating joint projects and programs.

Introduction.

WSROC thanks the NSW Environment Protection Authority for the opportunity to provide feedback on the *NSW Plastics: The Way Forward*. WSROC supports efforts by the NSW Government to decrease plastics and reduce litter.

Some of our member councils, and councils participating in Western Sydney regional waste strategy program, will make their own submissions. This document should be viewed in addition, and complimentary to those submissions. This submission has been developed from the ongoing discussion and direct input of the eight councils participating in this program: Blacktown, Blue Mountains, Cumberland, Fairfield, Hawkesbury, The Hills, Liverpool and Parramatta.

WSROC urges the Government to strongly take into account the feedback of local government given councils' close understanding of the sentiment of the community and support in delivery of actions identified.

Overall feedback

Councils are concerned that the proposals contained within this paper do not regulate out much plastic waste and there is an over reliance on transitioning to recyclable plastics than rather than greater efforts to transition to higher order reusable items.

There is a greater than expected reliance on trials and transitions rather than implementing direct item bans and initiative mandates. Overwhelmingly the timeframes for delivery of actions are too slow, with too many viable proposals suggesting three or six year timeframes or no commencement until 2030. Delayed development and implementation timeframes will result in councils having to manage the various impacts of single use plastics and littered items for much longer than expected, shifting costs and responsibility onto the community. Years of inaction and slow progress from voluntary schemes and trials cannot be allowed to continue.

There needs to be greater efforts to design out more plastic waste items rather than managing disposal pathways after use. Councils are disappointed to see more proposals that ultimately burden councils with the responsibility of more low-value, costly to recycle materials that will become recyclable, often in conflict with years education efforts to try to get residents not to put certain single use plastics in the yellow-lid bin.

It appears that considerable weight has been given to the ability of business to respond to potential plastic phase outs and little regard for the ability of local government and the environment to manage the repercussions of single use plastics. Additionally, it is unclear if the intent of the actions within this paper is to reduce problematic and unnecessary plastics or to reduce certain littered items. The absence of any modelling or impacts of the proposals has councils questioning the cumulative impact of the plastic items selected for action, and if this will deliver a reasonable reduction in litter or plastic generation.

The actions contained within this paper have a limited focus on single use food/beverage plastics, plastic bags and ballons and plastic chemical composition, and fail to address many of the problematic plastic items managed in NSW including poor quality plastic toys, appliances

and household items, commercial plastic packaging and items with overwhelming community support such as soft plastic packaging. Curiously, an analysis of the Key Littered Items Survey data shows a range of plastic items regularly found littered in high density, volume or top-ranking categories have not been addressed in this paper or previous plastic reduction initiatives and leads councils to question the selection of items proposed for intervention. This paper fails to propose real solutions to address the most littered items in NSW, confectionary wrappers/snack bags and cigarette butts, nor other top-ranking items such as OH&S items, tape, party poppers and personal effects/hygiene products. This paper also does not address emerging problematic plastics found in the environment, such as synthetic surfaces and vapes, that are causing significant concern for councils and in the community. Finally, there needs to be greater action hastening Commonwealth undertakings on product stewardship and packaging design and more leadership from NSW to advance plastic reductions.

1) Reduce Plastic Litter

a) Single-use plastic cups

Action 1

Councils strongly support actions to transition from single use plastics to reusable items and provision of the supporting reuse infrastructure and systems.

Councils support efforts to legislate to require venues to accept reuseable cups and are keen to see an expansion of this requirement to allow other appropriate reusables. This could include the requirement to allow consumers to use reusable plates or containers for takeaway food purchases or reusable containers for fresh food grocery stores such as at delicatessens, fruit shops and bakeries.

Additionally councils would like to see consideration of the requirement to serve in-store consumption of food and beverage in reuseable crockery and cutlery and the prohibition of service in single-use items when consuming in store.

Action 2

It is important that appropriate resources including adequate funding are invested into trials of reusable cups in government premises to make these successful. Failure of these trials will set unhelpful precedents for future initiatives and limit expansion to other sectors. Also, it is critical that government trials are well resourced and successful because demonstrating wide scale utilisation and implementation of reusables will have a significant impact on community acceptance and social norms that drive acceptability and use in the broader community.

There is concern that the end of 2027 delivery date for this action is too long. Councils would like to see this action delivered sooner, and believe as a government delivered initiative, this timeframe can be accelerated. Waiting three years to see this action delivered means any

subsequent learnings and replicable implementation is not likely until at least a year or two following, which is too long for higher order reuse initiatives.

Additionally, some councils are keen to be involved in trials in community settings for which they have influence. Councils would like to see resources, including funding, provided in these trials, be expanded to include interested councils, and be well resourced to ensure wide scale demonstration of success can be achieved across NSW.

Action 3

Councils would like to see the proposed reuse toolkits provide a mixture of practical implementation advice and support, funding for trials, conversion and evaluation, wide scale community education and whole of government support to ensure other NSW government systems (eg health and other regulations, state contracts, planning controls and other departmental policies) don't deliver conflicting responses and increased difficulty to the delivery of reuse precincts.

It is important that the development of new reuse-only precincts do not just "encourage [those] who want to" but are required in the design of new developments. This action should also seek to determine the strategic design solutions and standards required for new developments to deliver reuse only precincts. Given the long lead and development time to implement strategic change, there is an opportunity for the NSW Government to undertake this work in tandem with transformation of existing locations. This will allow for the future proofing of new precincts (and government premises detailed in Action 2) with reuse infrastructure to accommodate future policy requirements expected to flow from these trials.

Some councils would be very interested in this toolkit as they look to deliver their own reuse solutions at scale and would like to see the timeframes on this action bought forward to be delivered sooner than 2027. Councils are keen to see NSW Government support for retrofitting existing infrastructure to support reusable items (not just cups) both onsite and offsite in mobile or transportable infrastructure. Councils have noted their ability to influence community events as a key target for reducing single use plastics through reuse infrastructure. Toolkits and NSW Government support, including for trials should be designed to support this willingness and capitalise on opportunities for councils to demonstrate success.

Action 4

This action puts the focus on recycling plastics instead of eliminating excess plastic that makes its way into the environment. This also shifts the responsibility onto councils to recycle these items and educate the community on new recycling behaviours.

It is critical that the NSW Government ensures that efforts to increase the recyclability of single use cups is not just undertaken at the product design stage. Councils have seen a range of new packaging products designed to be recyclable, and often labelled as such with the ARL, but kerbside recycling contracts are unable (or willing) to recycle these items. There needs to be a

mechanism that supports councils to negotiate the inclusion of this (and other proposed items) into existing local government recycling contracts when this comes to fruition.

Similarly, it is important to ensure that any proposals to shift new items (feared to be a range of low value items) to the kerbside recycling system does not result in the value of the kerbside recycling stream dropping so low, compared to the cost of sorting, that the price of recycling is pushed higher and the impost to ratepayers (who fund this recycling system) is considerable. If this results in a low-value additions to the kerbside recycling scheme, and should contract costs rise too high, there is a real risk some local government areas who do not have widescale community support for recycling (including some in western Sydney) will shift the recycling stream to be disposed of at landfill. If this material does not have an economically viable circular solution, it will undo any efforts to reduce plastic waste volumes. These actions fail to propose any action to provide supporting infrastructure or facilities to recycle these items.

If products are unable to be recycled at a convenient alternate recycling scheme, such as a retail return point, this will significantly reduce recycling outcomes for these single use plastic cups and lids. This also creates much confusion for residents and consumers about where to recycle these items.

Action 5

There is some concern that the inclusion of the ARL will have no impact on the recycling rates of single use cups, given the low recycling rates of many existing recyclable household and takeaway items that bear the ARL. It is recommended that any research that demonstrates the effectiveness of the ARL at increasing away from home recycling or proper disposal to litter bins be published alongside the detail of this action when further developed.

Additionally, it is important that any behaviour change campaign developed is funded and delivered in full, and not drafted as suite of resources for local government or proactive organisations to promote using their own time, staffing and budgets.

Action 6

There is some cautious council support for the introduction of return options in reverse vending machines, rather than just recycling of used containers. In consideration of the design standards for single use plastic cups or plastic food containers, councils have suggested the exploration of alternative materials to plastic such as aluminium to reduce single use plastic generation whilst maintaining acceptability at RVMs and/or recycling facilities.

There is also appetite to increase the role of RVMs in place based reuseable precincts in NSW to enable solutions for accessible and timely return of reusable items to localised return points.

b) Single use plastic beverage bottle lids

It is believed that this works well in Europe and worthy of exploration for NSW beverages. However councils note that this change must be accompanied by a consumer education

campaign explaining the reasoning for the tethered lids and making the link to littering behaviours.

c) Single use plastic food containers

Please see the issues flagged under actions 4, 5 and 6 of single use plastic cups and note these concerns similarly relate to single use plastic food containers.

Furthermore, there is concern from some councils that depending on the design and delivery of this initiative (and single use plastic cups), there could be a perverse outcome of businesses choosing to use paper and cardboard plates and cups instead (for example as a result of logistics or price signals) with soiled plates and cups also needing disposal to landfill. Along the same lines, there is also concern that takeaway businesses will make substitutions to alternative single use plastic containers and cups that may fall outside design standards and potentially be labelled as "reuseable" rather than single use, but be used in the same manner as 'single-use' items. Following the relabelling of some single use plastic bags as 'reuseable" following the first round of plastic bans, this is a real concern of councils seeking to reduce plastic use.

d) Single serve condiment packages

Action 2

It is unclear why the requirement for takeaway food service businesses to display anti littering messaging only applies to single service condiment packages. Given the range of litter prevention messages in the community in recent years, it is doubtful that mandated signage alone will have an impact on condiment recycling or litter rates. While councils welcome any measures to support litter prevention or recycling education, it is unclear why a business mandate was chosen over other education initiatives and recommend a more considered approach to education for disposal of this item. Any messaging or education program should provide clear solutions for consumers such as 'please dispose here' or 'thanks for taking your packaging home with you'.

Action 4

Councils applaud the use of a co-design process to tackle these problematic plastic items. It is not clear why this specific plastic item is the only item to utilise a co-design process and this isn't expanded to other problematic plastics in the litter stream, including those that make up a larger quantity (by count or volume) of litter in the environment. Councils recommend the NSW EPA use this approach with other problematic plastic items to deliver solutions.

e) Plastic lollipop sticks

There is concern that in a transition to alternative single use lollipop sticks they will be unable to be recycled, and therefore not creating a circular solution. Similarly, there is concern that wood

alternatives may contain harmful chemicals such as PFAS. Current timeframes mean that certainty on allowable chemicals for food packaging (ie green and red lists) will be delivered after the requirement for the lollipop transition. It is recommended that Actions 1 and 2 of reducing harmful chemicals from food packaging be expedited to be delivered prior to the end of 2025 to support this transition.

f) Cigarette butts

There is a lack of clarity in the proposed action about what national collaboration may seek to actually achieve. While recognising and supporting the importance of a harmonised approach across the country, the action as drafted provides little comfort to councils that any real action to tackle cigarette butts can be taken in this program.

Given the very large counts of litter this item contributes, there needs to be significantly more action to tackle them than proposed in this paper. Noting the harmful impacts of the cellulose acetate filters contained with the cigarettes, there are mixed views across councils about how to prevent this litter, with a need to find a solution that does not contribute to microplastic pollution or have an adverse impact whereby smokers determine a cigarette butts design to be "more environmentally friendly" and justify littering behaviour.

Councils would like to see NSW EPA undertake more actions to tackle cigarette butt litter given it is the most littered item in NSW. It is recommended that at minimum that:

- NSW EPA fund any outstanding research needed to inform potential alternatives or design of alternate policy solutions, and
- increase enforcement of cigarette butt littering, including by mobilising state authorised officers and decreasing reliance on community reporting and local government enforcement.

g) Using our litter data

Action 2

It is recommended that NSW Government go beyond "considering" requiring brand owners of highly littered items to set litter reduction targets, to simply require them to do so. NSW has detailed litter data and the threat of requiring litter targets to be created is unlikely to instigate any change. Many of the brands contained in the highly littered items list are well aware they feature significantly in littered items counts and light-handed approaches have not delivered significant change to date. This action should be strengthened to require extended producer responsibility schemes and systems for the monitoring and regulation of brand litter targets.

h) Other reducing plastic litter concerns

Litter data

There is some concern from councils about a perceived reliance on local government to contribute to the Australian Litter Measure and Key Littered Items Study. While councils support the inclusion of council data and sites where council is happy to contribute, there has been recent pressure on councils to undertake litter counts in these manners to contribute to the state data set. The maintenance of the ALM and KLIS needs to be adequately resourced to not require (and ultimately place pressure on) local government to contribute to these data sets that underpin these important plastic litter reduction initiatives.

Bin infrastructure planning

Within this paper, it is noted that the current work of NSW EPA to develop a NSW Waste Infrastructure Plan will also look at how waste collection infrastructure in public places can be improved to reduce litter. It has not been clear how this piece of infrastructure planning work can be expanded to look at these outcomes but would be welcomed by councils. Current plastic and litter issues encountered that this work could address include:

- Lack of recognition of public place waste collection infrastructure as essential and greater need for strategic planning of assets for improved outcomes
- Litter bins not being well located to reduce littering
- Lack of butt bins and difficulties to identify existing butt bins (eg plane chrome poles) as bins
- Litter bin infrastructure not being cleaned or maintained adequately to encourage use, and lack of consideration for strategic operation of infrastructure
- Confusing and inconsistent placement of bin systems and litter infrastructure throughout NSW.

If a strategic review is undertaken to address the various deficiencies in public place waste collection infrastructure, councils would recommend:

- A focus on improvement of litter capture in the first instance before looking to increase circularity of plastics and materials. General public place waste management is unable to improve resource recovery and provide circular solutions without first addressing the key issue of getting waste disposed of into public place waste collection infrastructure.
- Investment in education for infrastructure and precinct designers and developers to ensure public waste collection infrastructure is designed into systems up front, rather than provided after areas have been developed. Landscape architects, town planners and others who design public places need to understand how to design waste prevention appropriately into plans.
- Strategic investment in appropriate and fit for purpose public place waste collection infrastructure to reduce litter.
- Increasing utilisation and consistency of appropriate statutory and strategic planning controls to consider litter prevention and ultimately circular plastic solutions.

Without a more strategic and considered approach to the placement and installation of return vending machines and public place litter bins, nothing is likely to change. We need to ensure systems for public place systems are convenient for users and efficient in capturing and preventing litter.

2) Reduce harmful chemicals in plastics and microplastics

a) Removing harmful chemicals from food packaging

Councils are concerned with the slow movement on the elimination of chemicals such as PFAS in food packaging, with a listed start date of "From 2030" unacceptable. While councils understand the need for national harmonisation, these timeframes mean likely outcomes will not be seen within this decade and NSW must accelerate this delivery timeframe if the NSW Government is unable to persuade the Commonwealth Government to act quicker on this.

Actions 1 and 2

Councils are concerned that the end of 2027 delivery date for this action is too long. Given actions within this paper to phase out alternatives to plastic, there needs to be clear guidance provided early in the delivery program to detail acceptable and unacceptable chemicals for food packaging. Given the transition of NSW to mandated source separated food waste collections, this work also needs to be expedited to reduce the risk of chemical contamination of food wastes and the resulting compost generated. Councils strongly urge the NSW Government to take swift action to eliminate PFAS and not wait for Commonwealth initiatives that councils fear are too slow to deliver change. The vague notion that specified timeframes will be determined must respond to the urgency with which councils want to see action to eliminate PFAS and other harmful chemicals that cause problems in organic waste recycling, landfill leachate management and far-reaching harm to the health of humans and the environment.

Action 3

Councils share the concerns noted about confusion between consumers and retailers over various claims made on packaging with regards to recyclability, compostability or biodegrading capacities. As councils transition to household FOGO services, the need for clear and certified labelling is paramount to assist residents understand claims being made and reduce contamination in the organic waste stream. It is also not clear if this action relates to the labelling of chemicals contained within the packaging (such as PFAS) or limited to labelling of chemical regulations related to recyclability or decomposition.

Action 5

Councils are concerned with the slow movement on the chemical certification and labelling in food packaging with a listed start date of "From 2030" unacceptable. While councils understand the need for national harmonisation, these timeframes mean likely outcomes will not be seen

within this decade and NSW must accelerate this delivery timeframe if the NSW Government is unable to persuade the Commonwealth Government to act quicker on this.

b) Reducing microplastics in the environment

It is strongly supported that labelling standards are underpinned by clear standards and testing schemes. Councils support the exclusion from sale of products marked 'degradable' with no valid standard or claim underpinning them. This green washing is confusing residents who note their selection of these products being made to help environmental outcomes. As councils transition to household FOGO services, the need for clear and certified labelling is paramount to assist residents understand claims being made and reduce contamination in the organic waste stream. It is also critical to reduce microplastic pollution being encountered across products in all domestic waste streams, in landfills, and in the environments for which councils face complex and costly clean ups.

3) Keep pace on plastic action

a) Heavyweight plastic film shopping bags

Action 1

There is support for the intent to reduce the consumption of problematic heavy weight plastic bags and increase circularity through the requirement of bags to require recycled content. However there is confusion in local government between conflicting motives for these changes, as the document notes that the actions intend to 'minimise littering' but seem to be focused on changing design standards to increase circularity.

While it is pleasing to see detail noting a testing mechanism that ensures that products are capable of repeat use for a decent load within the bag, there appears to be missing any component of this action, or subsequent actions, that seek to address the littering and/or lack of reuse behaviour by consumers regardless of the bag thickness and composition. It is doubtful that efforts to increase the durability of heavyweight plastic bags, or inclusion of an ARL are alone able to shift consumer behaviour to increase the reuse of plastic bags. Councils consistently see the disposal of heavyweight plastic bags in the domestic waste stream with no evidence of repeat usage, despite many containing markings encouraging reuse. Unless there are consumer education campaigns that encourage bag reuse to support this transition to reusable heavy weight bags, it is unlikely to deliver the required behaviour change.

Additionally, councils would like to see more information made available that details the negative life cycle analysis or impacts of paper based alternatives to plastic bags to shape future

discussions about plastic bag alternatives and help inform councils own decisions for purchasing and policy development.

Action 2

This action notes the need for plastic bags to be designed for reuse **"or"** be part of an extended producer responsibility scheme. Councils see that this action should be a requirement that plastics bags are both designed for reuse **"and"** need to be part of an extended producer responsibility scheme.

There is a clear lack of detail about what an EPR scheme would look like. This is a significant oversight of this paper and this program of works addressing plastics needs to do more to ensure this scheme is delivered. It is critical that any EPR scheme developed to address plastic bags and/other soft plastics does not shift any of the costs of delivery onto local government recycling contracts or undermine the contractual delivery of kerbside recycling services. We cannot have a repeat of the container deposit scheme where through the contractual systems that deliver kerbside recycling, processes created for instigating the scheme did not provide the expected outcomes for councils promised in the program design.

The NSW Government needs to ensure that Commonwealth reforms on soft plastics are delivered quickly and deliver the appropriate infrastructure for recycling plastic bags and soft plastics that meet community expectations and contribute to litter reductions.

b) Plastic barrier bags

Action 1

There needs to be greater clarity around what constitutes "unnecessary" plastic barrier bags, as the single example given does not provide clarity on what this action is seeking. Councils feel this action does not go far enough to address the impacts of plastic barrier bags being used once and the problems posed by plastic produce bags in landfills and in the litter stream.

It should be further considered that if barrier bags were replaced with compostable bags certified to industrial composting standards and used a second time by residents to line FOGO caddies, there should be no impact on the quality of the compost, as these bags would replace compostable liners already being used by residents and supplied by council. This action would keep NSW in pace with South Australia and Western Australia, rather than fall behind, despite different regulations on inputs to FOGO streams. Additionally, costs for residents' domestic waste service would likely decrease as some compostable bags costs shift from residents to the producer (ie the retailer who chooses to provide barrier bags,) meaning local government and ratepayers are not always funding the end of life pathways of packaging products. In consideration of this need to make barrier bags compostable, a design standard could be

created that provides a standard colour and design of barrier bags that reflects their compostability (or lack of for exemptions).

Any action on this front should not overwrite the elimination of any barrier bags deemed unnecessary.

c) Balloons

Action 1

It is not 100% clear what 'lighter than air' balloons are, as distinct from the release of balloons in general. Any subsequent communication with the community on this issue should avoid this term or provide greater clarity on what is meant. Councils support the phase out of the release of any balloons into the environment, into the air, on ground, in water or otherwise. This action should go further by not limiting the phase out to just balloons filled to be 'lighter than air' but include the release of any balloons.

Councils are also seeing litter items related to sky lanterns (floating lanterns) despite their ban on sale in Australia. While it is illegal to purchase them, this does not eliminate the use of home made lanterns or lanterns purchased in other countries. If sky lanterns are still being released into the environment, resulting in wire and half burnt paper/plastic composites in litter, there needs to be an expansion of this proposal to prohibit the release of 'lighter than air' lanterns.

d) Plastic balloon accessory items

Councils support the phase out of plastic balloon sticks, clips and ties and feel this action needs to go further to address balloon related litter in the environment. This action needs to capture all plastic balloon accessories, including plastic items contained with balloons when inflated. Litter audits undertaken by Hawkesbury City Council in mid-2024 found very large counts of plastic balloon confetti in public places. Unfortunately, by using the Australian Litter Measure litter count methodology, the small size of these pieces of plastic mean that they are not individually categorised when counted and are simply classed as microplastics. This has led to a marked underrepresentation of this litter type despite its presence in enormous quantities.

Similarly, councils would like to see an extension of this phase out to all single use plastic celebratory items, including plastic confetti, other balloon accessories, streamers and bunting. This includes any plastic items contained with balloons, including glitter, plastic confetti, plastic lights and plastic wrappers. The bursting or discarding of 'stuffed balloons' outside the home results in litter spread across a large area and is highly difficult to clean up in outdoor environments. Given widespread bans on plastic confetti already in place at many churches and wedding venues, there are a range of alternatives to confetti and plastic decorative party items already on the market for consumers to purchase.

e) Small food packaging items

Councils are doubtful about impact of the phase out of plastic fruit stickers and the priority of this item over more significant contaminants of the organic waste stream or litter in the environment. If compostable fruit stickers are a viable alternative, then a 2030 start date is too long away given the need for availability of this item in South Australia by 2025. This action should be aligned with or closely follow the South Australian implementation. Further work between 2025 and 2030 could support research and development into alternatives to fruit stickers to phase out this item all together.

Summary of Recommendations:

Item	Recommendation
Timeframes	Timeframes within the paper are long and should be expedited
Designing out waste	Increase efforts to design out waste over improving recyclability
Plastic items addressed	Expand plastic reduction proposals beyond packaging and balloons
Key Littered Items	Take greater action on highly littered items, including confectionary wrappers/snack bags and cigarette butts
Commonwealth initiatives	NSW Government to push to increased action/timeframes for Commonwealth led initiatives to deliver real change
Single use plastic cups- Action 1	Expand action to include other single use plastic reusables, such as containers
Single use plastic cups- Action 2	Adequately resource trials to change social norms Expedite action delivery date Design and facilitate council participation in trials
Single use plastic cups- Action 3	Ensure whole of NSW Government support for trials to ensure other government policy does not hinder delivery Require rather than encourage the use of precincts in new developments and facilities Expedite action delivery date Inclusion of councils in transformation and development of reuse facilities
Single use plastic cups- Action 4	Ensure improvements to design are accepted at recycling facilities Ensure inclusion of items in kerbside recycling maintains economic viability of service If items are not to be recycled through the kerbside recycling service, return points are numerous and accessible
Single use plastic cups- Action 5	Ensure behaviour change campaign is appropriately designed and resourced to shift behaviour

Single use plastic cups- Action 6	Consider the use of recyclable non plastic alternatives in design standards Consider the role of RVMs in return of reusable alternatives
Single use plastic beverage bottle lids	Ensure an accompanying consumer education campaign is delivered
Single use plastic food containers	Ensure improvements to design are accepted at recycling facilities Ensure inclusion of items in kerbside recycling maintains economic viability of service If items are not to be recycled through the kerbside recycling service, return points are numerous and accessible
Single use plastic food containers (continued)	Ensure behaviour change campaign is appropriately designed and resourced to shift behaviour Consider the use of recyclable non plastic alternatives in design standards
Single serve condiment packages	Expand the use of co-design processes to additional plastic items Provide an appropriate community education mechanise with a messaging focus on guidance to solutions
Plastic lollipop sticks	Ensure red and green lists of chemicals are delivered before this action
Cigarette butts	Deliver specific actions to directly reduce cigarette butt litter
Using our litter data	Require rather than consider brand owners take action on littered items
Litter data	Ensure adequate datasets are collected by NSW Government to reduce pressure on councils to participate
Bin infrastructure planning	Utilise the NSW Waste Infrastructure Plan program to address: - A focus on litter over public place recycling - Educate precinct designers to design public waste collection infrastructure into plans at outset - Strategic investment in fit for purpose public place waste collection infrastructure - Introduce strategic and statutory planning controls to consider this infrastructure
Removing harmful chemicals from food packaging	Expedite and specify action delivery dates
Heavyweight plastic film shopping bags	Educate consumers to reuse heavyweight plastic bags Ensure heavyweight plastic bags are both designed for reuse and need to be part of an EPR scheme Show leadership to expedite Commonwealth reforms on soft plastics

Plastic barrier bags	Provide more detail on 'unnecessary' plastic barrier bags Reconsider the action to mandate single use plastic produce bags as compostable to enable reuse
Balloons	Phase out any release of balloons to air, water or otherwise, including sky lanterns Expand the phase out of plastic balloon accessory items to all plastic balloon accessories, including balloon confetti Phase out the use of all single use plastic party celebratory items, including streamers, confetti and glitter
Small food packaging items	Expedite action delivery date and work towards a total phase out by 2030

If you have further questions about any of the issues raised in this submission please do not hesitate to contact the Western Sydney Regional Organisation of Councils:

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