



Advocating for the people of Western Sydney

SUBMISSION:

**Response to the draft Changing Behaviour
Together: NSW *Waste Less, Recycle More*
Education Strategy 2015 – 2017**

May 2015

EXECUTIVE SUMMARY

This submission is in response to the NSW Environment Protection Authority's (EPA) draft report *Changing Behaviour Together: NSW Waste Less, Recycle More Education Strategy 2015 – 2017* and has been prepared by the Western Sydney Regional Organisation of Councils (WSROC) in accordance with the views of the ten councils participating in the Western Sydney Regional Waste Strategy (Auburn City Council, Blacktown City Council, Blue Mountains City Council, Fairfield City Council, Hawkesbury City Council, Holroyd City Council, Liverpool City Council, Parramatta City Council, Penrith City Council and The Hills Shire Council).

Overall the strategy was received positively by WSROC and its councils, which feel that the goals are achievable. However, upon reading the strategy, it is not immediately clear who this strategy is written for. There is also some ambiguity regarding where the responsibility for each action point lies, and who will carry out each activity, bearing in mind councils are lacking resources and staff.

The item that received the most interest was the state-wide kerbside recycling campaign. This is a very exciting prospect, however there was some concern amongst our member councils regarding the focus and key messaging of this campaign. The development of standard communication material is very welcome, so long that the resources are flexible and adaptable, to ensure ease of usability by councils.

WSROC welcomes the acknowledgement of culturally and linguistically diverse (CALD) communities, and indigenous Australians in the guiding principles of the document, but could not see any corresponding action points targeting these groups from an educational perspective.

Catering to these communities is particularly important to Western Sydney councils who represent highly multicultural areas.

It also becomes apparent that some action points need to be completed before others. A hierarchy, timeline or indicative end-date would be helpful for guiding stakeholders.

We truly value the collaborative approach the NSW EPA has taken in the development of this strategy and appreciate the opportunity to provide our input. In this same spirit, we look forward to the final version of the strategy and in working together to increase resource recovery.

OVERALL

Overall, WSROC and its member councils agree with the broad intent of the strategy and are very supportive.

The strategy and the actions that make it up seem doable, however, this depends on the role the EPA will take in implementing the strategy. The EPA needs to take ownership of the strategy and be in the driving position to ensure actions are taken and clarify within the document the level of involvement required by the stakeholders.

There is some ambiguity around the level and nature of individual stakeholder involvement under each action point. For example, Action point 4.1 states:

'Develop guidance material so people better understand how to motivate behaviour change, focusing on designing, delivering and evaluating education programs.'

Regional waste coordinators are listed as a partner for this activity but the strategy does not outline whether these materials will be developed by the EPA with guidance from the regional waste teams, or vice versa.

The level of stakeholder involvement in each strategy action point will have a significant impact on the workloads of partners and stakeholders over the course of the strategy. Considering the limited resources of some councils, this is something that needs to be clearly outlined. Councils believe that the actions will have greater impact if coordinated and led by the EPA, and will minimise the need for councils to 'reinvent the wheel'. Programs that are easy for councils to adopt will increase the likelihood of being conducted within the timeframes of the strategy and a collaborative approach increases the effectiveness at both council and state level.

The evaluation measures for the strategy appear to be sound and well thought through, however, some investigation into the relationship between the education programs and diversion rates at state level, would be of benefit.

READABILITY

Generally the draft strategy is clear and concisely written, however it is not immediately clear who it is written for – whether the EPA, its partners, the public, or a combination of all three.

The strategy document is text heavy, with a certain focus on theory, and the language used is difficult at times to understand and lacks inspiration.

The strategy would benefit from an executive summary to ground the actions in the context of wider waste projects as well as programs of sustainability and water management. These functions are separate at the state level, but are often integrated at the local level.

An executive summary would also allow the document to reference current waste behaviours as outlined in existing data such as the Annual Local Government Waste and Resource Recovery Data Return. This could also introduce some baseline figures from which the effectiveness of education activities will be measured.

Providing a contextual introduction to the strategy would also prove helpful when sharing the document with non-waste staff within councils. Data that supports the need for a state-based waste education strategy should also be included and could be presented visually using tables and graphs.

Additionally, WSROC recommends the insertion of a short, explanatory paragraph before each of the six strategic directions to inform non-waste readers about the importance of these themes and the priorities within each.

While the document is quite clearly written and laid out, it would benefit from the use of more visual elements such as graphs, images and a time line for key actions.

GAPS

As the strategy is derived from the Waste Less, Recycle More program and related funding, one of its obvious limitations is the 2014-2017 implementation period. Education for behaviour change requires long term commitment and cannot be realistically evaluated in the short term.

Although, this strategy complements the objectives of the Waste Less, Recycle More program and funding package, it seems to have a singular focus on recycling and very little around reuse or waste avoidance which have a higher impact on environmental outcomes, as represented by the waste hierarchy. There are no specific actions addressing reuse and avoidance. As a minimum, this should be integrated into the social research action point, or ideally be integrated into proposed campaigns.

In addition to waste specific campaigns and in line with Principle 6, there is an opportunity to integrate waste education themes into mainstream programs as they relate, for example, food waste mentioned in TV cooking programs and safe asbestos handling in renovation programs.

KEY PRINCIPLES

Overall the key principles for this strategy are sound and it is positive to see that lessons from social psychology and behaviour change theories are being incorporated into waste education, as highlighted by Principle 6.

However, many of the principles focus on engagement of the masses and the 'late adopters' or disengaged portion of the community should not be forgotten as a target audience. Some work is being done in this area by the Behavioural Insights Unit of Premier and Cabinet, and a pilot or partnership program with this agency could be of interest to the EPA.

WSROC and our member councils have also identified some room for improvement as outlined below:

1. Fosters a spirit of active citizenship in caring for the environment

This principle and theory complements that in Principle 6.

2. Reflects and addresses the needs, values and motivations of target audiences

Considering the strategy has a strong focus on building the capacity of stakeholders and supporting partners to carry out the overall strategy, this should be reflected in the key principles. In addition to addressing the needs of target audiences, a new principle along the lines of *'Empowers partners to become self-sustaining educators'* could be considered.

3. Reinforces key messages over time and engages with new issues

Reinforcing key messages over time is key to long-term behavior change. To do this the strategy needs to clearly outline how it will enable and support councils to maintain key messages and education programs once the grant funding period has ended.

WSROC acknowledges that the strategy has been developed to a three year time frame, however this does not preclude it from building the capacity and resources councils need to continue this work once the initial funding period has ended.

6. Aims to generate positive social norms about the value of resources

This principle and theory complements that in Principle 1.

7. Respects and reflects cultural and linguistic diversity, and local Aboriginal culture

Meaningful engagement with indigenous and CALD communities is a key focus of WSROC and its councils. This principle is of great importance, yet it is not reflected in any of the strategy's action points. Specific information should be outlined as to how CALD communities will be targeted/approached.

8. Shows its effectiveness by being well researched, evaluated and reported

This is a key principle and well documented throughout the strategy. The concern from our councils surrounds the availability of social research as promised in action 1.1. This research – if it has not been carried out yet – will be available after education activities have already been developed and implemented. As such, education activities have not been developed with best practice in mind, or even, the best evaluation practices.

When research and studies do become available, they need to be readily and widely available and published promptly so they can be used by stakeholder groups to inform and develop campaigns.

ACTIONS

1.0 DEVELOP AND USE CONSISTENT MESSAGING

Consistent messaging is important for bringing about behaviour change, however, the messages that need to be conveyed vary between LGAs due to different kerbside collection practices between councils.

WSROC recommends that this strategic direction should include a disclaimer ‘where practical’ to allow for localised campaigns at the council level.

<p>1.1 Carry out social research on community attitudes, behaviour and knowledge about waste avoidance, reuse and recycling, litter, illegal dumping and problem wastes.</p>	<p>There are no partners or stakeholders listed as parts of the social research action. Potential stakeholders could include:</p> <ul style="list-style-type: none"> • Non-for-profits wanting grants to undertake this social research • Councils aiming to use the research to develop strategies • There is also the potential to collaborate with the waste educators’ network on this action point <p>A suggestion for social research around illegal dumping behaviours could be exploring the effectiveness of current enforcement strategies to prevent illegal dumping, with a focus on repeat offenders.</p>
<p>1.2 Run a state-wide kerbside recycling campaign, with local government partners, focusing on key household behaviours</p>	<p>WSROC and its councils are very excited about this action, and believe there needs to be a high-level campaign to renew focus on recycling habits within NSW however, such a campaign needs to be approached with caution and ensuring the campaigns core messages are relevant across all council areas will be a challenge.</p> <p>Kerbside collection services differ greatly from council to council, for example, Western Sydney councils differ as to what can be recycled in the yellow-lidded waste bin. A state-wide campaign would need to remain high-level and flexible to allow councils to localise</p>

messaging to effectively target their local communities.

A lot of consideration will need to be given to the messaging of a state-wide campaign if positive change is to be achieved across all local government areas.

Our councils have expressed that they would like to provide input during the development of such a campaign to ensure that state-level messaging does not contradict local recycling practices and therefore confuse residents.

Furthermore, any graphic elements connected to this campaign need to be adaptable to suit new policy developments (such as a container deposit scheme (CDS) should that transpire).

Previous state-wide campaigns such as **'Hey Tosser'** have received mixed reactions, and some frustration has been expressed regarding the design elements and branding of this campaign. For example, images of beaches and sea life are strongly referenced in the campaign but do not resonate well with communities who do not live along the coast and some regional councils have felt that the language used was not appropriate for their communities. (See Appendix 1)

The [Asbestos Awareness](#) campaign (see Appendix 3) run by the Asbestos Education Committee, is a good example of a campaign that allows partners access to a generous library of approved video, images and copy. These resources then be handpicked by partners to suit their target communities.

Providing a range of content to suit all localities and their communities is important and increases the opportunity for more councils to include themselves in these campaigns.

<p>1.3 Integrate this strategy’s principles into:</p> <ul style="list-style-type: none"> • Grant guidelines where education is a key delivery mechanism • Regional waste strategies • Other EPA strategies 	<p>A fourth bullet point should be included here reading:</p> <ul style="list-style-type: none"> • Local council waste strategies <p>One suggestion to aim to integrate these principles into local council waste strategies could be achieved by facilitating the development of council waste education strategies (see 3.0 Build Capacity).</p>
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2.0 INTEGRATE EDUCATION

As mentioned in the point above, standard education material would be greatly appreciated by councils, as long as there is scope to adapt these materials for LGA-specific waste practices.

Councils have also expressed the difficulty of adapting messages and materials for the wide range of minority language and cultural groups, who together make up a large proportion of the population in many areas of Western Sydney.

Provision of grants for waste education centres for the public and development of multimedia resources for schools and work in the community could also be of value.

<p>2.1 Review the education components of the Model Collection Contract to help councils work with waste contractors to deliver high-quality education.</p>	<p>We support this action in principle, however, we could not find the DECC 2005 Model Collection Contract online. Such documents should be made easily accessible for a wide variety of users.</p>
<p>2.2 Help councils by developing standard communication material that:</p> <ul style="list-style-type: none"> • Emphasises the importance of waste avoidance, recycling and waste as a resource • Explains ‘landfill end-of-life’ issues and why opening new landfills is not desirable 	<p>Additional bullet points could be inserted here:</p> <ul style="list-style-type: none"> • Caters for minority languages • Explains the move towards smaller residual waste bins. <p>Other types of standard communication material that would be useful to councils is an overview of the technology used at various waste facilities (and their effectiveness) that could be provided to the community as well as stakeholders from a non-waste background.</p> <p>The materials should be easy to use and manipulate by councils. The inflexibility of past materials made them less useful to councils.</p>

3.0 BUILD CAPACITY

Overall, this strategic direction and associated action points are well thought out and greatly needed. Building capacity within councils and other stakeholders is important for assisting with the effective implementation of this project, but also to ensure the principles and outcomes of the Education Strategy continue beyond this strategy.

While the action points are quite comprehensive, WSROC has some further suggestions for action not included in the draft document.

- **‘Provide an authoritative voice, to raise the profile of waste management and associated issues within local councils.’**

From the perspective of Council waste managers and educators, the EPA can help by bringing issues to attention of senior-level management within councils giving clout to waste issues, highlighting successful outcomes and encouraging top-down support for campaigns.

- **‘Ensure councils have the necessary tools and training to develop and deliver ongoing education strategies post-funding.’**

Our councils understand behaviour change is a long-term process. To build capacity for longer term thinking and to promote ongoing actions at local government level, the EPA could support councils to develop their own education strategies with short, medium, and long term actions and outcomes. Support could come in the form of future grant funding, training and technical assistance. There also needs to be consideration in the structure of grant funding, as historically, the timeframe for grant process has been very restrictive and promotes mainly short-term outcomes.

3.3 Set up an annual education and social research forum in a central location to highlight recent research finding and share best-practice case studies.

This is an important and well-received action point, however there was a request that school waste education providers and environmental consultants be considered as stakeholders. WSROC also believes it is important that any presentations or materials from this forum should be made available online, preferably as part of an ongoing centralised document library or portal.

There are also existing forums such as the WMAA waste educators group that the EPA could partner with.

4.0 PROMOTE EXCELLENCE

This strategic direction is strongly inter-linked with *Build Capacity* and is similarly important for WSROC and its councils. As per the comments for 3.0, case studies, online materials and other educational tools should be available from a centralised online source.

It is also important that these materials continue to be available to councils once the funding period has ended so that they may continue to reinforce long-term behaviour changes achieved through this strategy.

Exploration of systems to reward excellence could also be of value.

4.2 Create and circulate case studies on best-practice education, engagement and empowerment of households, business and industry.

How will these materials be circulated? An online portal (as described in action 5.3) would be the most useful method of distribution as it would mean materials are available on-demand and can be easily referred back to at a later date.

5.0 PROVIDE RESOURCES AND TOOLS

Many of our councils would support an extra action point about ‘forums or educational guides for real estate agents and strata managers to assist in educating new tenants’ in this section. Such materials have the added benefit of capturing residents entering a new council area that may have different kerbside collection practices to their former location.

Additionally, there should be an action point in this section regarding multi-lingual materials. Consideration of culturally and linguistically diverse communities is outlined in the key principles, but currently there is no action point to support this principle.

Councils have highlighted the difficulty of achieving consistent messaging across a culturally diverse population, particularly where LGAs feature significant populations who do not fit the ‘top ten’ languages noted in Appendix B of the strategy. For example Serbian, Assyrian and Macedonian are counted amongst the top ten languages in the Liverpool Local Government Area (but not within NSW as a whole) however education resources in these languages are almost non-existent.

It is important to bear in mind that the ‘top ten’ languages identified in NSW, do not necessarily represent linguistic needs, as many of the State’s top non-English languages spoken at home, such as Greek and Italian, also have a significant understanding and comprehension of English, whereas many emerging languages (e.g. Sudanese) are lower in overall percentage but significant due to their corresponding lack of English comprehension.

Many minority cultures together make a majority and educational support materials using consistent translated text need to be made available for these cultural groups. The development of a range of multilingual education materials that could be widely used by councils, is an action that would be supported by councils. This could be done for new materials as well as with existing materials, which could be updated simultaneously (as some were developed some time ago).

<p>5.1 Develop new information and reporting databases as necessary, and promote existing databases.</p>	<p>WSROC believes that providing groups with access to data captured via the RID online database would create a greater incentive to use this resource and councils understand the value of such a database. However, internal reporting systems will always be the first preference, therefore, there still needs to be support for councils to integrate existing reporting systems with RID online.</p>
<p>5.2 Develop an easy-to-use online reporting system for household problem waste data.</p>	<p>This action point should also be listed as contributing to the ‘Reduce illegal dumping’ WARR key result area, particularly in relation to asbestos.</p>
<p>5.4 Develop and promote education guidance material, such as on land-use planning and related issues for waste and recycling in multi-unit dwellings, for developers and town planners.</p>	<p>This action point should also include waste information for planners, private developers and architects. WSROC councils have expressed frustration with inadequate waste planning for new building designs, particularly multi-unit dwellings. This due, at least in part, to lack of awareness amongst developers.</p>

6.0 WORK WITH AND SUPPORT STAKEHOLDERS

This is a very welcome theme and it is positive to see collaboration with a wide variety of stakeholders emphasised throughout the document.

Another way in which the EPA could support stakeholders is to advocate for legislation that could support this work, for example, legislation change to stop businesses using non-recyclable plastic bags free of charge at point of sale.

<p>6.6 Set up an expert panel of contractors to give advice and training on infrastructure procurement</p>	<p>This action point would be very valuable as related to the action suggested under 2.2 to provide an overview of the technology already in use at various waste facilities and additional information from facility owners could be provided to councils to make educated purchasing decisions.</p>
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CONCLUSION

WSROC and its councils are very supportive of the strategy, however, in implementing the strategy, consideration needs to be given to the role of councils and regional coordinators. A strategy with actions that empower councils and regional groups to be more effective in delivering the programs will be well-received. EPA led actions such as standard communication materials and education programs that can be easily adopted by council and adapted to suit its individual needs will make it more likely for councils to adopt and run the campaign. This will result in a more powerful message if councils across the state are able to deliver it simultaneously.

One of the most positive themes throughout the strategy is the collaborative approach by the NSW EPA and consideration of its stakeholders.

Thank you for the opportunity to provide feedback on the draft strategy.

Appendix 1 – Hey Tosser campaign



THE DIRTY FACTS ABOUT LITTER



TAKE AWAY containers can take from **10 TO 450** years to breakdown

Around **50 MILLION** plastic bags enter the **AUSTRALIAN** litter stream every year





For every Australian there are **5 PIECES** of litter on **BEACHES**

? Did you know that litter increases the likelihood of other anti-social behaviour like graffiti and vandalism?

Glass bottles take up to **ONE MILLION** years to breakdown, plastic bottles take up to **450 YEARS** to breakdown





33% of the world's turtles and **43%** of seabirds have **INGESTED PLASTICS**

20% of wildlife **ENTANGLEMENTS** are caused by **PLASTICS** such as plastic bag straps



? Did you know that plastic bags breakdown into microplastics that collect pollutants and transfer up the food chain ultimately to humans?

HEY TOSSER!
Put it in the bin



Sources: The Ocean Conservancy, Hazards, B.D. C. Wilcox, T.J. Lovett, M. Lindvall and T. van der Walde (2014) Understanding the effects of marine debris on wildlife.

Appendix 2 – Asbestos Awareness campaign

Downloads, Media & Resources

MEDIA CENTRE

Access the media centre for press releases and comprehensive journalist notes. For print ready images visit the downloads page.

DOWNLOADS

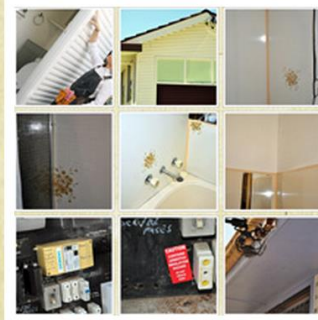
Everything to help raise awareness about the dangers of asbestos in and around homes. Downloads include high resolution images of asbestos products, hazard locations and promotional images; awareness collateral like posters and flyers available in 6 languages; online web banners; audio visual presentations and videos and various advertising collateral (press ads, radio ads and community service announcements). There are over 270 files to choose!

RESOURCES FOR REGISTERED PARTICIPANTS

Password Protected: Organisations and individuals who register to participate in the Asbestos Awareness Campaign are provided with a password to access special resources tailored to help them educate their communities. To access these resources please register.



HOUSES WITH ASBESTOS



PRODUCTS & LOCATIONS



HAZARDS IN THE HOMES



ASBESTOS REMOVAL