ILLEGAL DUMPING ACTION PLAN
2015 - 2018
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Introduction

Our Illegal Dumping Action Plan provides a framework to manage illegal dumping across Blacktown City. It builds on the actions undertaken in the previous plan (2011-2014).

Our objectives are to:

- Provide physical barriers as a deterrence to illegal dumping in key hotspots
- Remove suspected hazardous waste and asbestos containing material in a timely and safe manner
- Improve community awareness of our approach and services to reduce illegal dumping
- Increase investigations, widen enforcement exposure and intelligence gathering activities across our area
- Develop and maintain effective internal and community reporting and accountability.

What is illegal dumping?

The NSW Environment Protection Authority defines illegal dumping as:

‘The unlawful deposit of waste larger than litter onto land, that is waste materials dumped, tipped or otherwise deposited onto private or public land where no licence or approval exists to accept such waste. Illegal dumping varies from small bags of rubbish in an urban environment to larger scale dumping of materials in isolated areas, such as bushland’.


The Protection of the Environment Operations Act 1997 (NSW) provides a tiered range of on-the-spot fines and penalties for illegal dumping offences. The tiered penalties vary based on the severity of the illegal dump and intent of the offender.

Illegal dumping is a constant and highly visible problem for us and other council areas that have a high population density.

The four main types of illegal dumping in Blacktown City are:

- Domestic waste (for example furniture, clothing, whitegoods, garden waste)
- Construction and demolition waste (for example asphalt, timber, concrete, bricks and metal)
- Commercial and industrial waste (for example general waste, garden waste, oil and grease, tyres, and other hazardous waste such as chemicals and paint)
- Hazardous waste (for example gas bottles, oil, car batteries, syringes, pain, chemicals, asbestos containing material.)

What motivates illegal dumping?

Understanding the reasons why businesses and individuals illegally dump waste can assist in the development of effective strategies to combat illegal dumping.

Illegal dumping is carried out by all types of people in all parts of the community, from householders to businesses and other organisations. The Environment Protection Authority research has identified, there are four recurring reasons that motivate illegal dumpers. These are:

- Convenience
- Using organised networks, particularly with regard to waste generated by businesses
- An unwillingness to pay
- An uncaring attitude.
Impacts of illegal dumping

Environmental
- Degradation of bushland, reduction in biodiversity as the dumped material can interfere with revegetation
- Runoff from dump sites can contaminate soil and water sources such as creeks and dams
- Increased flooding and erosion risk as dumped items change natural water courses
- Increased fire risk as the dumped material can be a fuel source
- Loss of recyclable resources as the material once collected may not be recycled.

Social
- Decreased visual appearance of open spaces leading to reduced use by the public
- Increased physical and chemical hazards from sharp edges, nails, gases and liquids
- Increased health risk as dump sites may attract vermin and rodents
- Additional dumping from copy-cat offenders
- Decreased community pride and increased anti-social behaviour.

Financial
- Enforcement costs
- Collection, transport and disposal cost of dumped items
- Education and engagement costs.

Governance
- Consistent approach to enforcement on both public and private land
- Proactive stakeholder engagement and partnerships, for example partnering with the Western Sydney Regional Illegal Dumping Squad.
Trends in illegal dumping
This plan is about increasing community awareness and pride, and reducing the amount of rubbish dumped across our City.

Our experience has been that waste is dumped more frequently in areas that have a lot of residential flat buildings, or suburbs with pockets of poorly lit land, minimal traffic flow and limited passive surveillance. These are known as dumping ‘hotspots’.

Dumped asbestos containing material is the most significant and costly hazardous waste dumped in Blacktown City. Asbestos containing material can cause direct harm or injury to humans and wildlife and lead to pollution of the environment. We react quickly to remove asbestos due to the associated health risks.

Complaints we investigate
The following table shows the number and types of complaints we have investigated.

<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic dumped rubbish</td>
<td>808</td>
<td>815</td>
<td>753</td>
<td>919</td>
<td>992</td>
</tr>
<tr>
<td>Illegal dumping</td>
<td>121</td>
<td>144</td>
<td>206</td>
<td>166</td>
<td>151</td>
</tr>
<tr>
<td>Hazardous waste – open space</td>
<td>None recorded</td>
<td>3</td>
<td>2</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Hazardous waste – private property</td>
<td>None recorded</td>
<td>40</td>
<td>58</td>
<td>85</td>
<td>102</td>
</tr>
<tr>
<td>Hazardous waste – public roads</td>
<td>47</td>
<td>59</td>
<td>72</td>
<td>57</td>
<td>63</td>
</tr>
</tbody>
</table>

The number of complaints are consistent with a slight rise in domestic dumped rubbish complaints from 2013-2014. This could reflect the success of our community engagement and awareness programs and an increase in community pride.
Dumped construction and demolition waste
The following graph shows construction and demolition waste dumping hotspots and recorded tonnages in 2008-09 compared to 2014-15.

Interpretation:
- From 2008-09 to 2014-15 dumping volumes reduced in Eastern Creek by 96%, Prospect by 71% and in Riverstone by 70%.
- In Prospect and Eastern Creek the decrease may be attributed to:
  - Higher traffic levels as a result of the completion of the road linking Blacktown to Fairfield and the opening of Wet ‘n’ Wild and the Atura Hotel. This has increased the chance of dumpers being seen and reported, so it has acted as a deterrent.
  - Road closures of Boiler Close, Prospect, Yallock Place, Prospect and Honeman Close, Huntingwood decreasing easy access to dumping sites
- In 2014-15 our worst hotspots were Prospect (190 tonnes) Marsden Park (127 tonnes) and Riverstone (115 tonnes).
- Mount Druitt and Plumpton are no longer identified as hotspots because substantial development in both areas has reduced the number of potential sites for illegal dumping.
Dumped asbestos containing waste material

The following graph shows the number of asbestos containing material dumping incidents and disposal costs in 2009-10 compared to 2014-15.

**Interpretation**

- The increase in the number of incidents and the disposal costs may be attributed to:
  - Increased tipping costs
  - Changes to work, health and safety legislation resulting in significant additional cost for removal and disposal
  - More awareness of asbestos containing material by the community and our staff ensuring it is identified and disposed of correctly
  - Demolition of old dwellings containing asbestos containing material as urban renewal continues.
The current cost of illegal dumping

In 2014-15 our costs for illegal dumping were estimated as follows:

- In parks and reserves - approximately $220,000. Of this $35,100 was to safely remove dumped asbestos
- On roads throughout the City - approximately $96,100 plus a further $92,800 for illegally dumped asbestos removal.

These costs represent disposal costs, they do not reflect the other expenses such as staff time needed to investigate the incidents.

Offenders will be caught
Our officers patrol our City and issue fines for littering and illegal dumping. We also have surveillance cameras in some known rubbish dumping hotspots areas to catch offenders.

We re-joined the Western Sydney Regional Illegal Dumping Squad in March 2015. Since then, up until the end of August 2015, they have completed 155 investigations in our City resulting in $32,830 worth of fines. Annual update reports will be provided to Council.

Dumped domestic waste
We take an engagement and enforcement approach to domestic dumped waste in residential areas.

The previous table shows that a high percentage of dumping complaints we investigate are about domestic dumped rubbish. This is usually dumped waste left on the nature strip or footpath in residential areas.

Our priority is to identify the owner of the dumped waste and get the owner to remove it from the footpath as quickly as possible. We are successful in doing this 53% of the time and at the same time encourage the resident to properly use the free household clean up service provided for all residents.

The hidden costs of illegal dumping – what a waste!
Unfortunately when the dumper cannot be identified, the material collected is at an additional cost to Council and ultimately our residents. This is because the cost to remove dumped waste, unlike a free household clean up service, cannot be recovered by the domestic waste charge each household pays as part of their annual rates.

This means illegal dumping is more than a health, safety and amenity issue. It unnecessarily diverts our limited resources from other more positive programs such as using it for improving play equipment in our parks and maintenance of our local roads.
The first three years of the illegal dumping action plan (2011-2014)
We adopted the first plan in 2011. It addressed our approach to resources, education, reporting, enforcement, stakeholders and timeframes.

Key achievements
- 61% decrease in the recorded amount of illegal dumped material from 2008-09 to 2014-15
- Road closures in key hotspots in Prospect and Huntingwood
- Development and distribution of community engagement material including advertising on our street cleaning vehicles
- Partnerships with Housing NSW resulting in:
  - Increased reporting of incidents
  - Greater awareness and use of our household clean-up service
- Support from the NSW Environment Protection Authority through Operation Rosenberg which funded a 6 month surveillance program resulting in:
  - Acquisition of four cameras in 2012 which are still used in known hotspots
  - 7 convictions with fines for dumped furniture, building and commercial waste
  - Increased offender admissions due to photographic evidence
- The Environment Protection Authority’s Better Waste and Recycling program funded an illegal dumping project officer for three years
- We renewed our membership to the Western Sydney Regional Illegal Dumping Squad
- Development of an internal reporting database for illegal dumping.

New priority actions have been developed and have been themed as follows:

1. Deterrence
2. Hazardous waste and asbestos containing material
3. Community engagement
4. Enforcement and surveillance
5. Reporting and data collection.

Priorities
This plan outlines 28 actions that will progressively be implemented over the next 3 years, subject to available resources, and in accordance with the following priorities:

<table>
<thead>
<tr>
<th>Priority</th>
<th>Number of actions</th>
<th>Completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 - high priority</td>
<td>9</td>
<td>by 30 June 2016</td>
</tr>
<tr>
<td>2 - medium priority</td>
<td>3</td>
<td>by 30 June 2017</td>
</tr>
<tr>
<td>3 - low priority</td>
<td>1</td>
<td>by 30 June 2018</td>
</tr>
<tr>
<td>Ongoing</td>
<td>15</td>
<td>actions have commenced and continue to be implemented</td>
</tr>
</tbody>
</table>

Responsibilities
The responsibility for implementation of key actions has been assigned to the responsible operational and project area/s.

This includes identifying the project managers for the coordination of the Western Sydney Regional Illegal Dumping Squad (WSRID squad) and joint initiatives with the NSW Environment Protection Authority (EPA) and Western Sydney Regional Organisation of Councils (WSROC).

Reporting and assessment implementation
We will report our progress to the community through our integrated reporting and planning framework.

The implementation of the action plan will be re-evaluated in 2018.

Funding
The action plan will be funded from within existing operational budgets. However we will continue to source grant funding for new actions and to expedite current projects, for example:

- **NSW State Government’s Better Waste and Recycling Fund**
  We are eligible to receive funding for actions that deliver improved waste avoidance, resource recovery or tackle litter and illegal dumping.

- **NSW Environment Protection Authority’s Combating Illegal Dumping: Clean-up and Prevention Program**
  These grants support local councils, public land managers and community groups to identify local illegal dumping sites and implement prevention and clean-up action on publicly managed land.

New actions
New actions will be captured and reported through the Integrated Reporting and Planning Framework’s operational plan as new actions/highlights.
## Action plan

<table>
<thead>
<tr>
<th>Objective 1</th>
<th>Action</th>
<th>Responsibility</th>
<th>Priority</th>
</tr>
</thead>
</table>
| **Deterrence** | 1.1 Monitor and record where dumping is occurring to identify new hotspot areas | • Environment  
• Community law enforcement and waste  
• Civil and park maintenance  
• Development policy  
• WSRID squad | Ongoing |
| | 1.2 Install appropriate deterrence measures at new hotspot areas such as fencing, bunding, lighting and planting | • Environment  
• Civil and park maintenance | Ongoing |
| | 1.3 Install and maintain deterrence road signs | • Environment  
• WSRID squad | Ongoing |
| | 1.4 Require a waste management plan, on all development applications/approvals, to ensure appropriate disposal practices of demolition and construction waste occurs | • Environment  
• Development policy | Ongoing |
| | 1.5 Review and upgrade current road closure infrastructure in hotspot areas as appropriate | • Environment  
• Civil and park maintenance | 1 |
<table>
<thead>
<tr>
<th>Objective 2</th>
<th>Action</th>
<th>Responsibility</th>
<th>Priority</th>
</tr>
</thead>
</table>
| **Hazardous waste and asbestos containing material** | 2.1 Investigate and remove suspected hazardous waste and asbestos containing material illegally dumped on public land under Council’s control in a timely and safe manner | • Environment  
• Civil and park maintenance  
• Community law enforcement and waste  
• WSRID squad                                                                 | Ongoing  |
|            | 2.2 Respond immediately to public health risks posed by illegally dumped hazardous waste and asbestos containing material | • Environment                                                                                                                                                                         | Ongoing  |
|            | 2.3 Promote the safe management of asbestos in the community including asbestos awareness month | • Environment                                                                                                                                                                         | Ongoing  |
|            | 2.4 When disposal costs exceed the financial threshold, apply for assistance under the EPA guidelines for emergency pollution clean up program | • Environment  
• Civil and park maintenance                                                                                                                                             | Ongoing  |
<table>
<thead>
<tr>
<th>Objective 3</th>
<th>Action</th>
<th>Responsibility</th>
<th>Priority</th>
</tr>
</thead>
</table>
| **Community engagement** | 3.1 Engage with residents, body corporates and strata managers of multi-unit dwellings where illegal dumping is an ongoing issue | • Environment  
• Community law enforcement and waste  
• | Ongoing |
| | 3.2 Maintain and improve partnerships with key land owners to seek cooperation in minimising and removing illegal dumping e.g. Housing NSW, Planning NSW | • Environment  
• Community law enforcement and waste  
• | Ongoing |
| | 3.3 Develop and distribute illegal dumping awareness material for a range of dumping types such as renovators, properties adjoining open space, builders, multi-unit dwelling tenants | • Environment  
• Community law enforcement and waste  
• Civil and park maintenance  
• Communications  
• | 1 |
| | 3.4 Promote illegal dumping messages at community events | • Environment  
• | 1 |
| | 3.5 Publicise illegal dumping enforcement activities | • Environment  
• Communications and marketing  
• | 1 |
| | 3.6 Develop and install ‘report it’ signage in identified hotspots | • Environment  
• Community law enforcement and waste  
• | 2 |
| | 3.7 Promote incident reporting mobile phone applications that are easy for the community to use | • Environment  
• Communications and marketing  
• | 2 |
| | 3.8 Work at a regional level to raise awareness in the community of disposal options for hazardous waste and asbestos containing material | • Environment  
• WSROC  
• | 3 |
<table>
<thead>
<tr>
<th>Objective 4</th>
<th>Action</th>
<th>Responsibility</th>
<th>Priority</th>
</tr>
</thead>
</table>
| Enforcement and surveillance | 4.1 Partner with other agencies to carry out enforcement operations | • Community law enforcement and waste  
• Environment  
• EPA  
• WSRID squad | Ongoing |
| | 4.2 Monitor images from existing covert surveillance cameras at key hotspots | • Environment  
• Community law enforcement and waste  
• WSRID squad | Ongoing |
| | 4.3 Attend illegal dumping training events | • Community law enforcement and waste  
• Environment  
• Civil and park maintenance | Ongoing |
| | 4.4 Take action against property owners that receive and store waste material without approval | • Development policy | Ongoing |
| | 4.5 Undertake a better practice review of our approach to illegal dumping investigations and enforcement to ensure consistency, reduce duplication and improve efficiency | • Community law enforcement and waste  
• Environment  
• Civil and park maintenance  
• Development policy  
• WSRID squad | 1 |
| | 4.6 Complete a cost/benefit analysis to assess the value of increased and/or different covert surveillance camera use and other technologies | • Community law enforcement and waste  
• Environment | 1 |
| | 4.7 Investigate, and where appropriate, purchase new surveillance camera technologies | • Community law enforcement and waste  
• Environment | 2 |
<table>
<thead>
<tr>
<th>Objective 5</th>
<th>Action</th>
<th>Responsibility</th>
<th>Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting and data collection</td>
<td>5.1</td>
<td>Analyse illegal dumping data to inform deterrence and enforcement activities</td>
<td>Environment</td>
</tr>
<tr>
<td></td>
<td>5.2</td>
<td>Provide annual RID squad updates to Council</td>
<td>Environment</td>
</tr>
<tr>
<td></td>
<td>5.3</td>
<td>Create a standard database for all illegal dumping incidents (including asbestos and WSRID data) across Council</td>
<td>Environment</td>
</tr>
<tr>
<td></td>
<td>5.4</td>
<td>Establish a system to accurately record all costs associated with illegal dumping</td>
<td>Environment</td>
</tr>
</tbody>
</table>