# Reducing Illegal Dumping on Charitable Recyclers

**Action Plan 2019-2021** 





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## Introduction

The NSW Waste Avoidance and Resource Recovery Strategy 2014-21, is a key part of the Government's vision for the environmental, social and economic future of the state. The strategy is informed and driven by the waste hierarchy. Following the first principle, the avoidance and reduction of waste, the hierarchy prioritises the **re-use of materials**.

NSW's charitable recycling sector plays a crucial role in the re-use of household items, textiles and other goods across the state. It offers people an opportunity to dispose of unwanted goods, diverting them from landfill or, potentially, from entering the stream of illegally dumped goods polluting our kerbsides, bushland and other public spaces.

Charitable recyclers rely on good quality, reusable donations. These are predominately collected via street donation bins and in-store and can be sold to generate income to deliver valuable community services. However, the National Association of Charity Recycling Organisations (NACRO), the organisation representing Australia's charitable recyclers, estimates that only 70% of all items donated to charities nationally can be used. The remaining 30% is destined for landfill at significant cost to charities<sup>1</sup>.

Anecdotally, illegal dumping at charity donation bins and shopfronts is a significant issue for charitable recyclers across NSW. Leaving unwanted items, whether appropriate for re-use or not, outside bins and shops impacts community amenity, creates a public safety hazard and costs the community and charitable recyclers in clean-up, transport and disposal fees.

The EPA is committed to working with charitable recyclers within NSW to help reduce the amount of illegal dumping at donation bins and shops. This is by encouraging the community to donate responsibly, which includes challenging them to improve the quality of the goods they give. This commitment is a strategy action in the *NSW Illegal Dumping Strategy 2017-21*, which sets out the approach the EPA will take to meet the Government's target to reduce all types of illegal dumping by 30% by 2020. Reducing dumping around charity bins and shopfronts will contribute to this overall reduction target.

This action plan outlines how we, the EPA with support of its stakeholders, will reduce this type of illegal dumping using the same six approaches implemented in the NSW Illegal Dumping Strategy 2017-21.

# **Objectives**

The Reducing Illegal Dumping on NSW Charitable Recyclers Action Plan 2018-2021 aims to:

- reduce the incidence of illegal dumping on charitable recyclers
- create new social norms where the NSW community recognises that goods left outside charity bins and shopfronts is illegal dumping and views this as unacceptable
- create a new social norm where the NSW community will report incidents of deliberate and malicious dumping outside of charity bins to local government
- increase public awareness of responsible donation behaviour i.e. never leave goods outside
  donation bins or charity shopfronts, if the bin is full or the shop is closed come back at an
  appropriate time
- increase collaboration between NSW's charitable recyclers, local governments and other stakeholders.

## Illegal dumping on charitable recyclers

Charitable recycling is a significant industry across Australia. Charitable recyclers play an important role in the waste hierarchy, providing an opportunity for people to re-use their unwanted, quality goods that may otherwise have been destined for landfill or dumped in our streets, bushland or other public spaces. The funds raised from the resale of donated goods goes to support a myriad of causes that support our community.

While there are no statistics for the NSW charitable recycling industry, the NACRO website<sup>1</sup> lists the following significant figures nationally:

- There are close to 2,500 charity operated shops across Australia
- Gross national over-the-counter sales exceed \$500,000,000
- Over 1 million tonnes of goods are donated annually by way of in-store donations, donation bins, home pickups and corporate donations
- Donations comprise clothing, textiles and homewares
- Only 70% of donations can be used by charities, the rest are destined for landfill. However, for donated clothes, the re-use figure increases to 96%
- Mattresses are a particular burden to charities with respondents to a Victorian NACRO survey reporting that the disposal of dumped mattresses were their greatest financial cost



Fig 1. illegal dumping outside a Wollongong charitable recycling warehouse (photo courtesy of James Vincent, Southern Region Waste Program)

Anecdotally, illegal dumping has a heavy impact on charitable recyclers in NSW. Illegally dumped material around charity donation bins and shop fronts results in excess clean up and disposal costs for charities, ultimately diverting funds from charitable work.

Reports of dumping at NSW charity donation points are supported by photographic evidence. But the exact impact of dumped goods, by weight and disposal cost, has not been quantified. Illegal dumping at charity sites lies along a spectrum of behaviours ranging from well-meaning but uninformed donation behaviour through to the deliberate dumping of household and commercial waste.

In a 2016 report<sup>2</sup>, the Queensland government identified a spectrum of donation behaviour:



### **Champion donors 40%**

Well-informed donors who place a strong emphasis on personal responsibility for behaviour and stewardship of goods. This group prefers to donate at charity stores (unlike unintentional and deliberate dumpers who prefer to use charity donation bins) and are most likely to be older and retired.



#### **Unintentional dumpers 50%**

Well-meaning donors who lack sufficient awareness to understand appropriate donation practices. This group is comfortable with shifting the responsibility for the selection of quality items to charities. They are not aware that they are part of the problem and would be horrified to learn that their behaviour has created a cost for charities. This group is more likely to be aged 35-54 years, the least likely to have access to a car, and the most likely to be employed or currently a student.



#### **Deliberate dumpers 10%**

Knowingly use charity sites for the disposal of rubbish. This group typically considers that it is too difficult to figure out the kind of items that charities will accept and that they do not have time to sort items carefully. They are the most likely to consider that circumstances can sometimes force people to leave rubbish at charity sites. Deliberate dumpers are the most likely to speak a language other than English at home, the most likely to be unemployed or not seeking work, and the most likely to say that it is difficult for them to get to the tip.

## NSW Illegal Dumping Strategy 2017-21

Combatting illegal dumping is a key priority for the NSW Government and local communities. The government is committed to protecting local environments from pollution by reducing illegal dumping incidents by 30% by 2020. This target is the main goal of the *NSW Illegal Dumping Strategy 2017-21*. The strategy's action table summarises key actions and programs planned to achieve our target.

The table lists the following actions to combat illegal dumping on charitable recyclers:

- Develop a Charitable Recyclers Illegal Dumping Action Plan (this document)
- Fund prevention infrastructure and collateral through the Reducing Illegal Dumping on NSW Charitable Recyclers (RIDCR) program.

## Who are we working with?

The EPA has a leadership role in funding and delivering programs in line with the *NSW Illegal Dumping Strategy 2017-21* to meet the 30% dumping reduction target. The EPA regulates large-scale illegal dumping and helps other agencies, such as councils, to enforce the law through capacity-building efforts like joint inspections, campaigns and training.

The EPA works with stakeholders when delivering its programs. Combating illegal dumping on charitable recyclers involves partnerships with the following key organisations:

Stakeholder	Interest		
NSW charitable recyclers	Face the cost of clean-up and disposal of illegal dumping around charity bins and shopfronts  Work with the EPA and other stakeholders to reduce illegal dumping at donation points and improve community donation behaviours.		
NACRO	Concerned with the impact of illegal dumping on their member organisations.		
	Can provide the EPA with introductions to charitable organisations and assist in collecting dumping data, delivering consistent messaging about dumping and trialling prevention methods.		
Charitable recycling staff and volunteers	Responsible for the clean-up of dumped goods, risking injury from lifting dumped items. Are the public face of charitable recyclers and have an important role in educating the community about responsible donation behaviours. May be responsible for the implementation and maintenance of prevention techniques such as physical infrastructure and surveillance and collect evaluation data in trial projects.		
Donating public	Motivated to donate their used goods to charity for environmental (re-use, saved from landfill) and/or social (supporting work of chosen charity) reasons.  Research indicates that only 40% of donors are well-informed about what they can and can't donate and take responsibility for their behaviour. The rest are either well-meaning but unintentional dumpers or deliberate dumpers. The 50% of unintentional dumpers will be targeted with education to raise awareness about responsible donation to motivate behaviour change. Altering features of donation points may deter deliberate dumpers.		
Local government	Concerned about public amenity and community safety issues related to dumped goods around charity sites and may be responsible for clean-up and disposal costs when dumping occurs around charity donation points on public land. Some councils offer reduced or waived tip disposal fees for charities and/or an application and approval process for donation bins located on public land which controls the number and location of bins and their maintenance.  Councils can support charities in preventing and managing illegal dumping at donation points by providing project support, expertise and a regulatory response to dumping.		
RID squads and programs	Regional illegal dumping (RID) squads and programs tackle illegal dumping by householders and smaller dumps of construction waste in their region and are largely responsible for investigating illegal dumping incidents (<200 Tonnes).  There are five RID squads/programs in NSW, some of whom work with charities within their region on campaigns to prevent illegal dumping. RID squads/programs can support charities in preventing and managing illegal dumping at donation points by providing project support, expertise and by providing a regulatory response to dumping.		
Re-use organisations and other social enterprises	Organisations working in the re-use sector have a role in encouraging the NSW community to divert usable items from landfill by encouraging resale, sharing or donation.  Charitable recyclers, re-use organisations and other social enterprises have an opportunity to work together to identify which items are suitable for donation and to reinforce and encourage responsible donation behaviour.		

## Approach: building an evidence base

The EPA will build on our evidence base so all stakeholders can better understand the extent of the problem, and what drives it. This will help us make informed decisions when developing programs.

We have conducted research into the total impact illegal dumping has on NSW's charitable recyclers, which sets a baseline for how much material is dumped at charity sites and how much it costs charities to process and dispose of it. We will review, share and use the research findings to inform future activities to tackle charity dumping.

We have worked with social researchers to explore the behaviours and motivators of those people who dump around charity donation bins and shopfronts. This information will inform a series of behaviour change trials to be held in conjunction with charitable recyclers and other stakeholders in metropolitan and regional dumping hotspots.

## Approach: stakeholder engagement and capacity building

Combatting illegal dumping on charitable recyclers requires strong stakeholder relationships.

The EPA is committed to working with key personnel from NSW charitable recycling organisations and NACRO. They will provide expert advice and data to better inform programs. They will also act as a conduit between the EPA and charity workers.

We will support partnerships between charitable recyclers, re-use organisations, local councils and RID Squads and explore opportunities to share knowledge and expertise to build the capacity of charities to manage and prevent illegal dumping. We will publish best practice case studies informed by grant projects and behaviour change trials.

## **Approach: education and awareness**

Recent research shows that approximately half the people who donate to charity lack awareness of 'appropriate donation practices'<sup>2</sup>. This means nearly 50% of the community are unsure of the type and quality of items that are acceptable for donating to charity. This confusion is compounded by the fact that charitable recycling organisations differ in the types of goods they can and cannot accept.

With no awareness about appropriate donation behaviour, well-meaning, 'unintentional dumpers', may leave the responsibility of selecting useable items to charity staff. Unusable items then become the responsibility of the charity to dispose of.

The EPA will continue to encourage responsible donation behaviour, promoting the public to think about the quality of their donated items and to familiarise themselves with their chosen charity's donation guidelines. We will release media campaigns at peak dumping times such as Christmas and Easter. We will explore opportunities to advance messaging on social media using the hashtag #RateItDonateIt, introduced at Christmas 2017.



Fig 2. Image from the 2017 EPA Christmas charity dumping campaign (photo courtesy of Emma Schiller, EPA)

To support this work, we have created video content to raise awareness of the size and impact of the problem of dumping at charity sites. The content has been developed for traditional and social media and will be shared with stakeholders to strengthen illegal dumping messaging.

To ensure consistent and strategic messages about charitable dumping, we will develop a reducing illegal dumping on charitable recyclers communication strategy. This will be supported by educational material for use by our charitable stakeholders and grantees to promote responsible donation, discourage dumping and encourage reporting of people doing the wrong thing.

## Approach: prevention and infrastructure

The Reducing Illegal Dumping on Charitable Recycler (RIDCR) program provides funding to charities to install illegal dumping prevention infrastructure such as surveillance cameras, deterrence signage, lighting, gates and fencing (to secure site access). A pilot of this program was run in 2014, followed by grants in 2016.

Under the NSW Illegal Dumping Strategy 2017-21 the EPA committed to funding prevention, infrastructure and collateral through the Reducing Illegal Dumping on NSW Charitable Recyclers (RIDCR) program. This program will fund pilot projects informed by the recommendations from the social research identified in approach one.

## **Approach: regulation and enforcement**

Like all forms of dumping, people leaving goods at charity sites can have different motivations. These can range from a busy family leaving quality used clothes outside a full bin or closed shop through to individuals and businesses deliberately dumping waste not intended for charitable recyclers (e.g building and demolition waste). The EPA will use an online illegal dumping toolkit to provide resources such as a decision-making template to Authorised Officers seeking guidance on what approach to take for different charitable dumping behaviours.

Most people are unaware that fines apply for placing items next to donation bins and outside shop frontages. By encouraging responsible donation behaviour via strategic and timely media campaigns and by publishing when unscrupulous and deliberate dumpers are caught and fined, we create community awareness that this behaviour is illegal, won't be tolerated and that penalties apply.

As well as increasing the perceived risk of getting caught, this approach encourages the general public to report illegal dumping on charities. Increased reporting will help establish a social norm where illegal dumping on charities is seen by the community as an unacceptable behaviour.



Fig 3. mattress dumped outside charity recycling bin (photo courtesy of Pat Daley, The Salvation Army)

## Approach: evaluation and monitoring

As we learn more about dumping at charitable sites, we should also review our actions and tactics. We need to know what interventions work, what don't and why.

We will work with key stakeholders to evaluate the outcomes of projects and media campaigns. We will evaluate grant projects and publish challenges and successes as case studies, while sharing good news stories with local audiences.

The EPA will evaluate the impact of the action plan against its contribution to the state target of a 30% reduction in illegal dumping, and this will be shared with our stakeholders.



(Stock image: credit Julien-Pier Belanger)

<sup>&</sup>lt;sup>1</sup> National Association of Charitable Recycling Organisations, 'Fast Facts', accessed 17 September 2018

<sup>&</sup>lt;sup>2</sup> Leggatt-Cook, Chez & Grevis-James, Nancy & Wilson, Jill & Hall, Vicki & Batchelor, Samantha. (2016). Does your donation count or cost? Understanding donating and dumping behaviours and their impacts for Queensland charities.

## Reducing Illegal Dumping on Charitable Recyclers Action Table 2019-21

Building an evidence base	Stakeholder engagement and capacity building	Education and awareness	Prevention and infrastructure	Regulation and enforcement	Evaluation and monitoring
<ul> <li>Illegal dumping programs are informed by strong evidence</li> <li>Improved understanding of illegal dumping behaviours at charity sites and the motivations behind them</li> <li>Establish baseline of amount and cost of illegal dumping at charities</li> </ul>	<ul> <li>Continue to build and maintain stakeholder relationships with charity partners</li> <li>Charitable recyclers work with local councils and other key stakeholders</li> <li>Charitable recyclers have the knowledge and skills to create practical local and regional solutions</li> </ul>	<ul> <li>The community understands that leaving items outside charity sites is dumping and won't be tolerated by the community</li> <li>Social norms encourage responsible donation behaviour</li> </ul>	Charitable recyclers adopt measure to prevent illegal dumping	Enforcement action for illegal dumping at charity sites is proportionate to the offence	<ul> <li>Actions are based on data and outcomes achieved</li> <li>All groups have information and data on illegal dumping so we can coordinate actions</li> </ul>
June 2019 - completed Undertake research into the impact (amount and cost) of dumping for charitable recyclers. This research will inform future programs.	Ongoing  Facilitate discussions and workshops between key stakeholders to support opportunities for increased collaboration between charities, re-use organisations, councils and RID squads/programs	Ongoing – released April 2019  Promote video on the impact of dumping on charitable recyclers via social media platforms	May 2019  Develop trial projects using recommendations from social research. Co-design workshop held in May 2019.	November 2019  Develop a guide for authorised officers to respond to charity dumping. This will be provided in the illegal dumping resource kit	Ongoing Use our evidence base to monitor and evaluate programs
May - completed Undertake research into the behaviours and motivations of dumping at charity sites to inform trial projects	Ongoing  Engage with NACRO and key representatives from NSW charitable recyclers to enable ongoing knowledge sharing and keep up-to-date with emerging illegal dumping issues impacting charitable recyclers	June 2019  Develop a reducing illegal dumping on charitable recyclers communication plan	August 2019 Start to roll-out behaviour change trials with charitable organisations		Annually Evaluate projects and share challenges and successes each year
	Ongoing Share key learnings from research and trial projects	Ongoing  Develop media campaigns at peak times			August 2020 Evaluate and publish a report on the impact of the action

					plan against its contribution to the state target of a 30% reduction in illegal dumping by 2020.
		Ongoing  Develop educational materials encouraging responsible donation			
EPA, LOCAL COUNCILS, CHARITIES, COMMUNITY, NACRO	EPA, LOCAL COUNCILS, CHARITIES, NACRO, RID SQUADS RE-USE ORGANISATIONS	EPA, CHARITIES, NACRO	EPA, LOCAL COUNCILS, CHARITIES	EPA, LOCAL COUNCILS, RID SQUADS	EPA, LOCAL COUNCILS, CHARITIES