



Mr Jeremy Conway
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Infrastructure SA
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Email: infrastructure@sa.gov.au

13 November 2023

Dear Mr Conway

Re: South Australia's 20-Year State Infrastructure Strategy Discussion Paper

Thank you for the opportunity to provide feedback on the *South Australia's 20-Year State Infrastructure Strategy Discussion Paper*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies.

An integrated WARR system is good for both the environment and the economy, given that it drives jobs and economic growth. At present in South Australia (SA), WARR activity directly and indirectly employs around 5,000 people with an annual turnover of greater than \$1 billion and contributes around \$0.5 billion to Gross State Product.¹² SA also leads the nation in its levels of resource recovery, with a reported rate of 81.9% for 2021-22. With almost four (4) million tonnes of materials recovered from households, businesses and construction activity processed locally through SA facilities resulting in a reduction of greenhouse gas emissions by 1.31 million tonnes of CO₂-e.³

WMRR welcomes the SA government's recognition of the multiple economic, employment and decarbonisation opportunities arising from a circular economy. A thriving and well planned WARR industry in SA, will be vital to achieving the objective of this strategy. Given the role material outputs can play in reducing reliance on virgin materials, having the added benefit of assisting with decarbonising and creating economic jobs in both recycling and infrastructure in SA.

Sound infrastructure planning will be integral to an accessible WARR industry in SA as material will be both required and produced throughout the lifecycle of infrastructure development and operations. SA's transition to a circular economy also requires clear recognition of WARR services as a form of essential infrastructure. In WMRR's view, the strategy would benefit from cross-referencing *South*

¹ South Australia's Waste and Resource Recovery Infrastructure Plan, Green Industries SA 2018

² South Australia's Waste Strategy 2020-2025, Green Industries SA 2020

³ Green Industries SA, Circular Economy Resource Recovery Report 2021-22.

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Australia's Waste and Resources Recovery Infrastructure Plan (2018) (SA's Waste Infrastructure Plan), noting that this plan needs updated given that a number of significant investments have progressed, and national export bans have been placed on some materials since publication. WARR infrastructure is a key piece for each of the objectives set out in the Discussion Paper.

The criticality of the WARR sector, including its infrastructure has been tragically highlighted by the shocks of recent natural disasters, including the pandemic in recent years. These have resulted in the creation of large unplanned volumes of waste needing removal and differing disposal treatments at scale. Strategic planning that includes the recognition of both business-as-usual growth as well as these types of surges needs to occur to ensure that there is resilience across WARR networks, to protect the accessibility and useability of infrastructure and to ensure that the community has the best possible opportunity to recover quickly and sustainably from such events. It is for these reasons that WMRR considers it vital, that the SA Waste and Resource Recovery Infrastructure Plan and the Waste Strategy be incorporated into this Strategy and echo connected sentiments. Given the vital role that this strategy will play in establishing and supporting the continued growth of South Australia.

WMRR's responses to the consultation questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

Gayle Sloan

Chief Executive Officer

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Annexure A

Submission:

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| <p>Consultation question 1</p> <p>What opportunities should we consider to improve South Australia's (SA) growth?</p> | <p>Further explore opportunities stemming from the circular economy given the focus on design, recycling and remanufacturing, and the ability of SA to capitalise from having a slightly isolated market that it can use its own recovered materials as manufacturing inputs particularly on large infrastructure projects that could utilise construction and demolition materials at scale. Further SA could utilise this opportunity to specify increased use of recycled or circular products within its infrastructure projects to drive the creation of local SA employment opportunities.</p> |
| <p>Consultation question 7</p> <p>How can South Australia (SA) better coordinate infrastructure investment to support a growing population?</p> | <p>Suitable, well-located WARR infrastructure is an essential element in providing liveable and well-planned places and must be recognised in the strategy through appropriate cross-referencing of the SA's Waste Infrastructure Plan and appropriate recognition across the planning system. Noting the link between population growth and increases in urban area with increasing volumes of waste material generated and remanufacturing opportunities created.</p> <p>The well-planned provision of suitably located facilities for the collection, aggregation, processing, treatment and recovery of such wastes is essential for both the environment and the continued operation of industry, as well as the community. The development of such facilities requires appropriate planning (land use and transportation) as well as buffers, given that there can be high levels of sensitivity to encroachment.</p> |
| <p>Consultation question 14</p> <p>What are the opportunities for infrastructure investment to accelerate attainment of the Closing the Gap targets?</p> | <p>WMRR is aware that research has previously been undertaken on waste management needs across remote communities. Review and funding of this work would assist with essential service provision and raise community awareness and understanding of waste and resource recovery operations.</p> |
| <p>Consultation question 15</p> <p>What infrastructure investments will support industries to transition to a global net zero future?</p> | <p>The WARR sector is intertwined with all other industries, we have a vast opportunity to assist the entire supply chain in reducing its carbon footprint and reducing reliance on virgin materials. In addition to mitigating our end-of-pipe emissions through landfill diversion, organics processing, and methane recovery, the WARR industry is integral to creating a regenerative economy in Australia that is bolstered by reuse, remanufacturing and repair and will further enhance the reduction of indirect emissions, e.g., through</p> |

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| | the reduced extraction of virgin materials for product manufacturing, extended product lifespan, and more. |
| <p>Consultation question 18</p> <p>What action is needed to achieve a circular economy in South Australia?</p> | <p>Transitioning SA to a circular economy should be a priority action of this strategy in recognition of the economic and environmental benefits. To create a strategy that values resources (circular) or even 'closes the loop', there must also be principles that drive actual resource recovery. At present the strategy does not address that the materials we consume are valuable and where possible we should minimise consumption (avoidance) and maximise resource efficiency (maximise life cycle at highest and best use for as long as possible), to support circular thinking and acting.</p> <p>Following a systems-based approach to managing materials, must be underpinned by the adopted waste management hierarchy, for the infrastructure sector as we move towards a genuine circular economy that considers carbon mitigation, emphasises product design and sustainable natural material management, as well as having clear pathways for the use of secondary raw materials in order to keep these in circulation. It is gratifying to see recognition of the power of procurement in the strategy and WMRR encourages Infrastructure SA to look to Victoria's EcologiQ recognising the work being done by GISA in this area also (Circular Economy Knowledge Hub)</p> <p>WARR opportunities require space and land use needs, need to be factored into planning including:</p> <ul style="list-style-type: none"> • buffers and services for existing • zoning for new and expanded • precincts and hubs • suitable transport infrastructure and access. |
| <p>Consultation question 19</p> <p>What measures can be taken to enable the infrastructure industry to decarbonise?</p> | <p>In the product design phase consideration of non-virgin material, along with reuse and repurposing of existing assets or designing for end-of-use modulation (removeable components and flexible structure etc).</p> <p>Where relevant and possible, precinct design – complementary and supporting industries co-located to enable logistic efficiency, by-products as feedstocks etc.</p> |
| Consultation question 21 | As already discussed, disaster waste management planning and associated infrastructure development need to be considered. |

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| What are the critical resilience issues that South Australia needs to address? | |
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