



Dr Jon Gorvett
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Dear Dr. Gorvett

Re: Feedback on the EPA 30-Year Strategy

Thank you for the opportunity to provide feedback on the 30-Year Strategy, which will set out how the EPA will help deliver a healthy, valued, and resilient environment in 2055, and preparing the [Regulating for Tomorrow discussion paper](#) ("the discussion paper"). The discussion paper articulates initial ideas on how the EPA can regulate better in the future (and in particular in the 2025-2035 period), the current trends shaping our future environment, and examples of how the EPA could evolve. WMRR commends the EPA for its forward-looking approach in establishing a long-term vision for South Australia to 2055 and for methodically working backwards to determine and prioritise the strategy required to achieve this outcome.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$21 billion waste and resource recovery (WARR) industry. With more than 2,330 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. Our members are involved in a range of important WARR activities within the Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable secondary raw products from resource recovery, energy recovery as well as community engagement and education. In South Australia (SA), WMRR represents over 250 individual members from more than 45 entities. The state generates 5.38 million tonnes of waste each year with a stated resource recovery rate of 83% delivering an economic value of \$1.37 billion employing 4,410 South Australians.

WMRR strongly advocates for a systems-based approach to resource management in Australia, advancing a circular economy to drive material productivity through the waste and resource management hierarchy – that is, the avoidance of waste wherever possible, and the diversion of materials from landfill through design for reuse, repair, recovery, recycling and composting of resources. Where residual waste cannot be avoided, the hierarchy prefers producing low-carbon energy from fuel production or the treatment of waste for energy production (Energy from Waste or EfW) over the capture of methane from landfill.

WMRR appreciates the EPA's flexibility in accepting WMRR's written submission and has formatted this response largely in alignment with the survey questions on the consultation webpage.

Global and local trends that should shape the strategy

In WMRR's view, the three (3) trends that will be most important in shaping South Australia's environment and the EPA's role over the next 30 years are:

1. Emerging contaminants and pollutants like microplastics and nanomaterials
2. A net zero economy
3. Valuable materials going to waste

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It follows that the EPA's 30-Year Strategy must be based on the vision of a net zero economy where less is used for longer, that is, materials are safely and effectively reinvested, and an environment that has adapted to climate change and continues to prioritise investment that mitigates further carbon impacts and optimises material productivity. Achieving these outcomes requires all SA government agencies - including the EPA - to evolve towards broader systems thinking to address the continual interplay between the economy and the environment. WMRR notes that the review of the *Waste to Resources Policy* 2010 (released for consultation in 2024) has already clarified the EPA's focus on SA's transition to a more circular economy and towards achieving net zero emissions, which WMRR would like to see as being captured as a long-term commitment in the EPA's 30-Year Strategy.

Key Priorities to 2055

In WMRR's view, the 30-Year Strategy should prioritise supporting and promoting SA's transition to a circular economy, supporting sustainable development by providing science-based advice and setting clear and appropriate standards for environmentally significant industrial activities and supporting licence holders to comply with these standards. As such, the EPA's 30-Year Strategy should address these priorities systematically through:

- i. focusing on producer obligations to design out waste, design for recoverability including addressing hazardous materials and reducing contamination in the first instance;
- ii. utilise legislative frameworks to develop and support circular product markets;
- iii. increased commitment to higher order resource recovery over landfill, and
- iv. implementing more robust, integrated performance metrics to lead evidence-based decisions.

- i. *Enhance the focus on producer obligations*

Achieving circularity and net zero by 2055 requires a systems-based approach from the SA Government, and particularly the EPA to regulate and restrict harmful inputs being placed on market at the start of the value chain. This should include:

- Regulatory and policy settings that obligate manufacturers and producers to design for circularity including extending the lifecycle of products, by for example, designing out problematic waste and hazardous materials in order that constituent materials can safely be recovered and reinvested into the economy. WMRR supports prioritised action regulating batteries and battery powered products, and designing out hazardous chemicals including PFAS from products. Implementing framework legislation (akin to the NSW *Product Lifecycle Responsibility Act* 2025) as soon as practicable would enable regulating specific products for their entire lifecycle including design, reuse, repair and end of life management.
- Directed efforts to optimise organics diversion requires source separation at collection to minimise contamination risk, availability of appropriately located facilities for processing, and securing end-markets for offtake. Implementing legislative reform for mandatory source separated C&I food organics collections strengthening monitoring of emerging contaminants such as microplastics and PFAS, and investing in science-backed data to manage new risks should be prioritised.

- ii. *Utilise legislative frameworks to support circular product markets*

In addition to focusing on the front-of-pipe inputs into circular products through enhanced producer obligations, the EPA should also prioritise supporting the uptake of circular products using appropriate regulatory and legislative levers.

Mandating requirements for the use of secondary materials over virgin materials within existing government supply chains (at all levels of government procurement) given the positive emissions impact that this can have, has initially been addressed through the *Waste to Resources Policy* 2010 review, and could be strengthened in

the EPA's 30-Year-Strategy to include a target for 2055 where the use of secondary materials, where available are the default requirement for government contracts.

The 30-Year Strategy should explicitly seek opportunities for alignment with other Australian jurisdictions wherever possible to enhance consumer uptake and commercial production of circular products across national and global markets. The reality is that circularity measures will continue to be thwarted by options to manage or produce materials in other jurisdictions where there are less expensive and less onerous obligations, which includes virgin materials albeit their emissions profile are more harmful.

There are obvious opportunities for the EPA to move forward on aligning SA with other Australian jurisdictions, particularly in the areas of product stewardship for problematic materials, source separation of commercially collected food organics, implementing low-risk codes or exemptions for materials derived from waste to be reinvested into the economy, and the phase-outs and design mandates for plastics and packaging. In the absence of a national directives framework, mirroring what has been put in place in other jurisdictions to design out waste, improve circular outcomes and decarbonise industry makes sense in terms of reducing complexity for national supply chains, creating alignment and placing pressure on non-complying jurisdictions (and operators) to keep pace.

iii. Increased commitment to higher order recovery over landfill

To be consistent with a vision of a circular, net zero economy for SA by 2055, the long-term strategy must commit to preferencing all recovery options above landfill in accord with the waste management and resource recovery hierarchy. As a starting point, this means using all available levers to disincentivise landfill, such as the Waste Levy. Forecasting significant waste levy increases ideally for the following five (5) years will provide circular infrastructure investment and planning certainty. This is particularly important for large capital infrastructure projects which will be necessary in some parts of the state to facilitate equitable access to circular, low carbon outcomes for their materials.

The 30-Year Strategy must also reinstate supporting higher order recovery infrastructure. In particular, Energy from Waste (EfW) must be recognised as a controlled and complementary waste treatment solution that is preferable to landfill. To date, there has been an obvious lack of progress in this space in SA, with some government agencies framing EfW in a negative tone whilst appearing to prefer the capture of methane from landfill.

iv. Implement more robust, integrated performance metrics to lead evidence-based decisions

The discussion paper articulated the EPA's suggestion to improve transparency through plain language explanations of complex science, licensing decisions, and compliance actions over the next ten (10) years. WMRR suggests that this goes beyond plain language explanations to sharing real data with industry and the broader community in order to demonstrate the progress made over time, identify key targets for specific sectors/industries and facilitate broader understanding of the integral link and interdependencies of net zero and increased circularity.

WMRR recommends this transparent reporting extends to:

- Greenhouse gas emissions avoided through diversion and treatment of waste streams - including scope 2 and 3 emissions and avoided carbon through displacement of virgin alternatives (not just avoided landfill) and lifecycle emissions reductions from reuse and extended product life to support emissions and net zero targets;
- Environmental impacts such as the reduced energy and water consumption per tonne of material processed; and
- Timely, standardised contamination audits using a consistent, statewide audit methodology to enable tracking against the contamination and recovery targets.



Transparency and public reporting (against progress) will provide a real opportunity for the EPA to demonstrate the carbon mitigating impact of reducing waste and increasing the reinvestment of existing resources into existing supply chains. This should set the EPA for success in achieving the vision of a net zero, circular economy in 2055 by showing measured progress over time.

WMRR trusts that these comments will be useful in shaping the EPA's 30-Year Strategy. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia