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By email: ClimateChange@sa.gov.au

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Dear Ms Favier

Re: Feedback on the draft 'Report on the review of the Climate Change and Greenhouse Emissions Reduction Act 2007'

Thank you for the opportunity to provide feedback on the draft 'Report on the review of the *Climate Change and Greenhouse Emissions Reduction Act 2007*' ("the draft report"). South Australia's *Climate Change and Greenhouse Emissions Reduction Act 2007* ("the Act") establishes a framework for government, business, and the community to work together to reduce greenhouse gas emissions and support adaptation to climate impacts. The objects established under section 3(1) of the Act relate to:

- (a) Ecologically sustainable development
- (b) Emissions reduction targets, policies and programs
- (ba) Transparency (added in 2025)
- (c) Energy efficiency and conservation
- (d) Research and development
- (e) Commercialisation of renewable energy and technologies
- (f) Recognising achievements
- (g) Consultation (strengthened in 2025 to explicitly include First Nations)
- (h) Adaptation
- (i) Reporting
- (j) Consistency with national and international policy
- (k) Contribution and responsiveness.

Under Section 21, the Act must be reviewed to assess how effectively its objectives are being achieved, outline climate adaptation measures implemented by the state government, identify any additional legislative actions needed to meet targets, and address other matters determined by the Minister for Climate, Environment and Water. Feedback received from stakeholders such as WMRR will be considered by the government in delivering future measures to progress the objects of the Act.

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

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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. In WMRR's view, Australia's transition to a low-carbon circular economy urgently requires government leadership to facilitate trade in low-carbon and circular products. Doubling Australia's circularity rate by 2035 and reaching net zero will require a systems-led approach that recognises and rewards avoided (or reduced) emissions through resource recovery across entire value and supply chains.

It follows that state and federal governments must prioritise driving systemic change that maximises resource efficiency to cut carbon emissions. WMRR's comments for more pronounced recognition of the link between the waste and resource recovery sector to preserving nature, decarbonisation and material productivity are supported by the recent *Delivering Net Zero Infrastructure: Workforce Report* from Infrastructure Australia and the Productivity Commission's *Opportunities in the circular economy* report, which also articulated this crucial nexus between carbon reduction and increased circularity of resources. As such, WMRR makes the following comments on the draft report - noting that whilst the draft report shows significant evidence of progress against objects of the Act - the amended object (ba) for transparency and public reporting (against progress) provides a real opportunity for SA to strengthen the link between reduced emissions and the WARR industry by demonstrating the carbon mitigating impact of reducing waste and increasing the reinvestment of existing resources into existing supply chains.

1. The draft report is evidence of SA's impressive progress and continued ambition

The 2025 draft report represents a turning point with legislative reform, strengthened targets, mandatory reporting, broader consultation, and a comprehensive approach to adaptation and resilience. It is reassuring to see that earlier this year, the Act was amended, strengthening requirements for government planning, risk assessment, and climate action, while updating South Australia's targets to achieve net zero greenhouse gas emissions by 2050, achieve a 60% reduction in net greenhouse gas emissions (from 2005 levels) by 2030 and achieve 100% net renewable electricity generation by 2027. The draft report's emphasis on the government's commitment to accelerating timelines for targets and improving transparency/public reporting in its review of progress against the objects of the Act are demonstrative of the State's appreciation that reducing emissions requires governments to be accountable and responsible for driving change rather than relying on market-based mechanisms to drive reduced emissions.

WMRR stresses this point as unfortunately, despite a federal government commitment to decrease carbon emissions to 62-70% below 2005 levels by 2035, the supporting [Industry Net Zero Sector Plan](#) is primarily focused on the decarbonisation of scope 1 (direct) emissions, and relies heavily on existing market measures including the Safeguard Mechanism, the Future Made in Australia agenda and the Net Zero Economy Authority. It is therefore critical that our state governments, such as SA, continue to take the lead in driving real change towards a net zero economy with reduced emissions and renewable electricity.

2. The interconnectedness of WARR and reduced emissions should be explicitly recognised by the SA Government in the final and future reports

Whilst the SA government has led climate action and resource recovery actions and initiatives in Australia, the crucial nexus between reduced carbon emissions and increased circularity has not been articulated in SA. Strengthening the link to increased circularity and avoiding waste is an essential pathway to meaningfully reduce emissions and maintain and grow competitive industries, and this should be captured in government instruments such as the draft report and its constituent policies, plans and programs.

Currently the draft report references SA's *Net Zero Strategy 2024-30* as providing the outline of the government's objectives, policy priorities and actions against *Object (b): Emissions reduction targets, policies and programs*. The draft report - whilst linking waste and circular economy as a key sector for emissions reduction policies and programs does not clearly articulate that improved resource efficiency – particularly the procurement of recovered, recycled and remanufactured resources in any sector - can progress the objects of the Act. This is a missed opportunity for the government to clearly articulate the nexus between carbon abatement and increased material productivity with reduced waste creation.

WMRR recommends that the revised report clearly states that the SA Government has identified reducing carbon emissions through improved waste and materials management as a central element of its policy and regulatory framework. For example:

- South Australia's [Advanced Manufacturing Strategy](#) is referred to on page 11 in regard to the Manufacturing and Resources Sector. However, the draft report does not reference that this strategy identifies that '*national and international requirements for reduced carbon emissions creates demand for innovative net-zero carbon technologies, infrastructure and recycled materials*';
- Whilst the [20-year State Infrastructure Strategy \(2025\)](#) is referenced against the Built Environment Sector on page 12, there is no emphasis placed on its [recommendations](#) for Green Industries SA to consider the role of waste-to-energy as a viable option, aligned with circular economy principles.
- WMRR notes the emphasis on the government leading by example (page 10), including the introduction of the Department of Infrastructure and Transport's Sustainable Procurement Policy, and the Climate Ready Government Initiative. As a consequence of the recently introduced systematic tracking and reporting of adaptation measures, WMRR trusts that the 2029 report will include metrics against the objects of the Act and hopes to see rapid action across state government procurement of recovered/remanufactured materials.
- WMRR also notes that consultation is now open on the South Australian [EPA's 30-year strategy](#). The *Regulating for Tomorrow* [discussion paper](#) identifies a vision for 2055 where circular economy principles guide how we produce products, use materials, recover resources and reduce waste. This

strategy should also be captured in the draft report, noting the interconnectedness of materials recovery and reduced emissions.

Furthermore, promoting transparency, including through public reporting was introduced under object (ba) in 2025, and WMRR notes the opportunity for future reporting to demonstrate the significance of increased resource recovery and circularity of materials on reducing greenhouse gas emissions. For example:

- In reference to the Waste and Circular Economy sector's progress towards emissions reductions targets, policies and programs under object (b), the draft report points to the development of a suite of guidance material supporting best practices for waste and resource recovery management from Green Industries SA, and action banning the use of an extensive range of single use plastics. It would be beneficial for the report to provide metrics on the reduction in emissions (and materials) linked to these initiatives.
- Both the reviews of the *Environment Protection (Waste to Resources) Policy 2010* and the draft *2025-2030 Waste Strategy* are referenced against the Waste and Circular Economy sector's progress towards emissions reductions targets, policies and programs under object (b), with the government's response to the public consultation on the draft documents currently in progress. WMRR's feedback on both of these documents reiterated the crucial link between decarbonisation and targeted investment and government incentivisation for maximising resource recovery opportunities across the state. WMRR also made recommendations to have clear measurable metrics included in the revised Waste Strategy to articulate clear, specific, measurable, and time-bound goals that can form a credible path towards achieving its vision of accelerating SA towards a circular economy by 2030, such as greenhouse gas emissions avoided through diversion and treatment of discarded materials (ie residual waste), circular economy indices such as material reuse, and lifecycle emissions reductions from reuse and extended product life. WMRR would also seek that that progress on batteries management should be specifically reported upon given its importance for waste and circular economy outcomes. Again, WMRR contends that under object (ba) for public transparency, the inclusion of such data should be included in the 2029 report.

WMRR trusts that these comments will be useful in the review of the draft report. Please contact the undersigned if you wish to further discuss WMRR's comments.

Yours sincerely



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Chief Executive Officer
Waste Management and Resource Recovery Association of Australia