



Mr Josh Wheeler
Chief Executive Officer
Green Industries SA
Attention: 2025-2030 waste strategy consultation
PO Box 1047
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By email: GISA.WasteStrategy@sa.gov.au

23 July 2025

Dear Mr Wheeler

Re: Accelerating SA's transition to a circular economy – South Australia's Waste Strategy 2025 - 2030

Thank you for the opportunity to provide feedback to Green Industries South Australia (GISA) on *Accelerating SA's transition to a circular economy – South Australia's Waste Strategy 2025 – 2030* (the "Draft Strategy") and for providing a consultation workshop and data overview on 3 July 2025 for the Waste Management and Resource Recovery Association of Australia (WMRR). Across Australia, WMRR represents more 2300 members from approximately 400 entities spanning the breadth and depth of the waste and resource recovery (WARR) 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.

Being at the forefront of the ongoing evolution towards whole-of-system action and the development of a circular economy, WMRR strongly advocates for a systems-based approach to managing materials in Australia to prolong life and mitigate carbon impacts. This includes fierce advocacy for the waste and resource management hierarchy, which promotes avoidance of waste, and the diversion of materials from landfill through design for reuse, recovery, recycling and composting of resources. WARR activities play a crucial role in the broader economic system both in terms of providing materials management through operating appropriate infrastructure, and in terms of supplying market ready recovered or remanufactured materials to Australian industries, for example construction and manufacturing. Given the clear benefits of recovered materials (reduced emissions, job creation and

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building local resilience), it is imperative that products derived from resource recovered materials are able to compete in local and global markets with virgin products, and that investment in innovative recovery technologies is promoted and supported by all levels of government.

WMRR acknowledges the extensive consultation process undertaken by GISA for the Draft Strategy, and its ambition to identify the priority areas and actions that will have the biggest impact to accelerate SA's transition to a circular economy and meet the overriding objective to double SA's circularity rate by 2035. However, WMRR considers that, in its current form, the Draft Strategy lacks the necessary focus, clarity, and concrete government actions to continue to drive meaningful, system-wide transformation required to meet its seven (7) targets.

Rather than presenting a cohesive and actionable plan to continue the acceleration of SA to a circular economy, the 92-page document largely consists of lists—often accompanied by vague actions and open-ended timeframes—that fall short of integrating the essential market mechanisms, regulatory frameworks, and funding supports needed to accelerate the state to a circular economy. Overwhelmingly, the Draft Strategy assigns no responsibilities or obligations to product manufacturers, instead mostly relying on GISA and other state bodies to “encourage” change, without commitments to legislate or regulate, or support with dedicated funding, thus relying heavily on local governments and individual households to take the lead.

In WMRR's view, to reach the 2030 targets in such a short timeframe and maintain SA's determination to be a leader in this space, a much stronger and clearer roadmap, actively led by government is needed. Substantial revision of the Draft Strategy is urgently required to articulate clear, specific, measurable, and time-bound goals that can form a credible path towards achieving its vision. Vague, passive commitments such as “advocate for,” “support,” “encourage,” or “consider”, along with “ongoing” timeframes should be removed. Where possible, the revised strategy should capitalise on obvious opportunities to align with other jurisdictions in areas such as acceptable organics inputs, circularity metrics, harmonisation of kerbside bins, and modernising the CDS scheme. However, it is also vital that the revised five (5) year strategy concentrate efforts on specific priorities that will affect the biggest change in SA within the prescribed time frame.

In WMRR's view, the revised strategy should:

- i. enhance its focus on producer obligations to design out waste, address hazardous materials and reduce contamination in the first instance;
- ii. invoke stronger legislative and funding supports to drive the management of priority materials which can most effectively increase circular outcomes;
- iii. improve alignment with industry capability through infrastructure planning and include commitments to invest where there are capacity shortfalls and positive references to higher order recovery including energy from waste (EfW). Furthermore, given the growing impacts

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of climate change and the profound impact of disaster events on the WARR industry experienced by both SA and other states in recent years, it would be prudent for the revised strategy to include provision for disaster preparedness and GISA's business continuity amidst such events, and,

- iv. implement more robust, integrated performance metrics to lead evidence-based decisions that will further accelerate SA towards a circular economy.

i. Enhance the focus on producer obligations

Accelerating towards a circular economy necessarily requires strengthening producer responsibility to ensure the safety and circularity of materials placed on the market alongside efforts to driving systemic behaviour change to minimise contamination and waste. Clear labelling requirements, backed by regulatory sustainable design standards, will mitigate greenwashing and encourage correct management of materials and products during and at end of life (minimising contamination risks). However, Table 1 of the Draft Strategy - which sets out how the strategy applies to each group - does not identify producers/manufacturers at all. Instead, individuals, households, NFPs and community groups, research institutions, businesses, education sector, the WARR industry, local and state government are identified as sharing the responsibility. None of these groups are responsible for creating the products placed on market.

Reducing waste generation per capita is not only about individuals making choices to consume less and consume better (i.e. for repair and reuse), but also about utilising less materials in our supply chains for longer. To have a significant impact on reducing waste creation and improving circularity, the revised strategy should not anticipate improved waste avoidance outcomes from focusing primarily on 'end of pipe' actions such as encouraging greater support for skilled trades to enact the right to repair, and look to local government and the WARR sector to increase recovery from waste streams, which whilst part of the solution cannot solve the current challenges of unsustainable production and consumption. Rather, the revised strategy to move towards a genuine circular economy (as opposed to a recycling economy), must also look to the start of the value chain and establish 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. In particular, WMRR supports prioritised action regulating batteries and battery powered products, and designing out hazardous chemicals including PFAS from products.

Producer responsibility in relation to the management of batteries and battery powered products, needs to be progressed as a matter of immediate urgency in the revised strategy. The possible poor design and the incorrect disposal of batteries and the products that contain them, is the biggest threat to successful recycling and waste management— both through the direct risks to all types of

infrastructure and workers, and indirectly through cost implications and availability of insurance. Similarly, the management of PFAS also threatens the viability of recovered products - particularly recovered organics, given the current position of SA promoting the acceptance of compostable packaging for organics processing. If SA wants to accelerate its transition to a circular economy, it must show leadership and act to enhance producer obligations for what is placed on market. WMRR urges SA to prioritise action to:

- restrict emerging contaminants such as PFAS from entering circular supply chains by restricting organic inputs in the first instance to exclude all packaging (including compostable), and looking to phase out hazardous chemicals used in packaging (as per the “red” and “green” lists provided under the NSW Plastics Plan), and
- implement framework legislation (akin to the NSW *Product Lifecycle Responsibility Act 2025*) to enable regulating specific products for their entire lifecycle including design, and end of life management.

Both of these actions would also assist the prioritisation of addressing plastics and packaging in the revised strategy given the lack of national progress of mandatory product stewardship under APCO and its failure to meet the 2025 national packaging targets.

ii. Invoke stronger legislative and funding supports to drive the management of priority materials which can most effectively increase circular outcomes including carbon mitigation

Currently in SA, only the Construction and Demolition (C&D) target has been met, and significant effort is needed across both the Municipal Solid Waste (MSW) and Commercial and Industrial (C&I) streams to meet the targets. It follows that in order to meet the SA targets, action and investment should prioritise extracting valuable resources from within these streams. WMRR would propose that this would commence with organics including food waste given that this is the greatest amount of material that SA has to recover to meet targets at almost 100,000 tonnes, the next being material being plastics.

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. It follows that the strategy should:

- In the first instance, commit to implementing legislative reform for mandatory source separated C&I food organics collections - given that 18.8% of C&I waste is food waste.
- Prioritise product quality of recycled organics by committing to the implementation of an input material list by a specific date. Compostable packaging should be removed from the organics stream, noting the real risk of contamination from incidental PFAS is raised by including *any* packaging in the compostable stream. This would also support the focus on

reducing emerging contaminants within the circular economy. For example, NSW has a statement on FOGO inputs for collected materials to support its mandated separate collection for household and commercial FOGO. We note there is a Draft Strategy “action” 2.11 to “progress” an input materials list, but with no accountability for a measurable outcome.

- Identify infrastructure needs and allocate funding supports based on evidence highlighting those locations with the volumes to rationalise the development of simplified, place-based anaerobic digestion or composting systems. Whilst “encouraging” organics recovery infrastructure in regional and remote areas is considered a regional goal under Target 4, there is no concrete funding or time frame associated with this action.
- Implement sustainable procurement by government at all levels for recovered organics - in particular FOGO derived composts - to develop secure, circular markets. This could be by way of implementing a sustainable procurement policy across government or committing to recycled content thresholds.

These efforts would complement the measures to enhance producer responsibility - particularly for plastics and packaging and battery and battery powered products – which should also assist in reducing contamination in the organics stream. They would also have the additional benefits of moving towards achieving SA’s recovery targets and reduce carbon impacts by removing organics from landfill.

Further, the revised strategy should explicitly include ongoing funding and investment for behaviour change programs to complement and build on legislative measures aimed at reducing waste creation and contamination, as well as promote circular consumption. This should encompass targeted support for initiatives that promote reuse, repair, and recycling, fostering circular behaviour. For instance, in the case of organics, programs should encourage the use of reusable cutlery and food serveware over disposable alternatives, and prioritisation of purchasing products made from recycled material. Likewise, sustained behaviour change funding should be directed towards priority materials such as batteries and packaging, to raise awareness around safe, effective material management from design, purchasing, and through to disposal and waste avoidance.

iii. Improve alignment with industry capability through infrastructure planning and include commitments to invest where there are capacity shortfalls

Key to the success of the strategy will be future proofing WARR infrastructure. It is crucial that the revised strategy recognises that WARR infrastructure needs to be resilient, as well as being cognisant of the waste and materials hierarchy which preferences energy recovery over landfill. Gaps in recycling infrastructure need to be addressed, and investment efforts in remanufacturing/recycling capacity should be underscored by access to markets to ensure economic viability of new and existing facilities. To achieve this, the revised strategy should prioritise:

- Addressing access to appropriate WARR infrastructure across the state by updating the strategic WARR Infrastructure Strategy and adjust regional targets as necessary. It follows that funding should be directed to infrastructure projects that can make the biggest impact on the state targets utilising the comprehensive data that SA has- being cognisant of the limitations of economics, logistics and available infrastructure for the regions.
- Supporting higher order recovery infrastructure. In WMRR's view the Draft Strategy does not accurately frame EfW as a controlled and complementary waste treatment solution that is preferable to landfill. For example, WMRR notes the comment at action 3.30 that *"energy recovery activities aren't removing valuable materials from the economy"* is redundant in a system where source separation is prioritised. This contrasts with the positively phrased inclusion of landfill gas extraction and use of landfill waste output for operational purposes as beneficial (p 68). To accelerate SA towards a circular economy, the strategy must be consistent in positioning landfilling as the least desirable option. EfW must have policy support and be clearly recognised as higher up the hierarchy than landfill.
- Committing funding to longer-term grant schemes with outcome-based milestones to drive innovation for materials where there can be significant impacts. For example, textiles has a low 16% recovery rate.
- Forecasting waste levy increases ideally for the five (5) year term of the strategy to provide circular infrastructure investment and planning certainty. This is particularly important for large capital infrastructure projects.
- Implementing sustainable procurement by government agencies to prioritise products with recycled content and circular design with a timing beyond "ongoing".

Infrastructure planning should also include provision for effective disaster waste management, including ensuring that there is sufficient surge capacity in times of disaster. The increasing unexpected impacts of climate change, such as the Murray River Flood highlight the need for the revised strategy to support the resilience and continuity of essential WARR facilities. The following additional actions are therefore recommended for inclusion:

- Development of business continuity plan for GISA itself, as a small agency, in the face of one or more significant disasters (e.g., fire, flood, storms, disease).
- GISA funded modelling of anticipated disaster scenarios as part of updating the current *Disaster Waste Management Capability Plan* in SA, including analysis of potential priority wastes by impact and scale under modelled likely impact scenarios of natural, as well as other types of disaster (eg clinical or agricultural such as foot in mouth) disasters of increased frequency and scale, risk assessments, and associated planning for preparedness with funding, responsibility allocation and governance considerations.



- iv. *Implement more robust, integrated performance metrics to lead evidence-based decisions that will further accelerate SA towards a circular economy.*

Given the title of the strategy (and its intended outcome) of “Accelerating South Australia towards a circular economy”, the metrics and reporting mechanisms need to be enhanced to capture more than tonnes diverted from landfill. Where possible, it would be prudent to capture regional and metropolitan metrics to reflect the impacts of varying targets and levels of government-led investment. These metrics should include:

- Circular economy indices that align with the national Circular Economy Framework and to methodologies used by other jurisdictions such as material reuse, material productivity and repair frequency to both measure progress and assist evaluation against national targets;
- Economic indicators showing the uptake of and demand for recovered materials over virgin counterparts to demonstrate the state’s shift towards a more circular economy;
- 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;
- Measures showing households and business attitudes, awareness and behaviours to underscore investment in targeted behaviour change programs;
- Social value indicators such as job creation, social enterprise engagement, and community participation in recycling, recovery and avoidance efforts, and
- Timely, standardised contamination audits using a consistent, statewide audit methodology to enable tracking against the contamination and recovery targets.

To further accelerate SA towards a circular economy, provision should be made within state-led funding for these metrics to be used to build robust circular data systems and knowledge-sharing hubs for councils, contractors, and innovators. This will aid further investment decisions into circular infrastructure and the design of behaviour change programs to assist in waste avoidance and increasing the circularity of materials.



WMRR hopes that our feedback will be carefully considered in the revision of the Draft Strategy to ensure it delivers greater focus, clarity, and firm government commitments capable of driving meaningful, system-wide transformation over the next five (5) years.

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