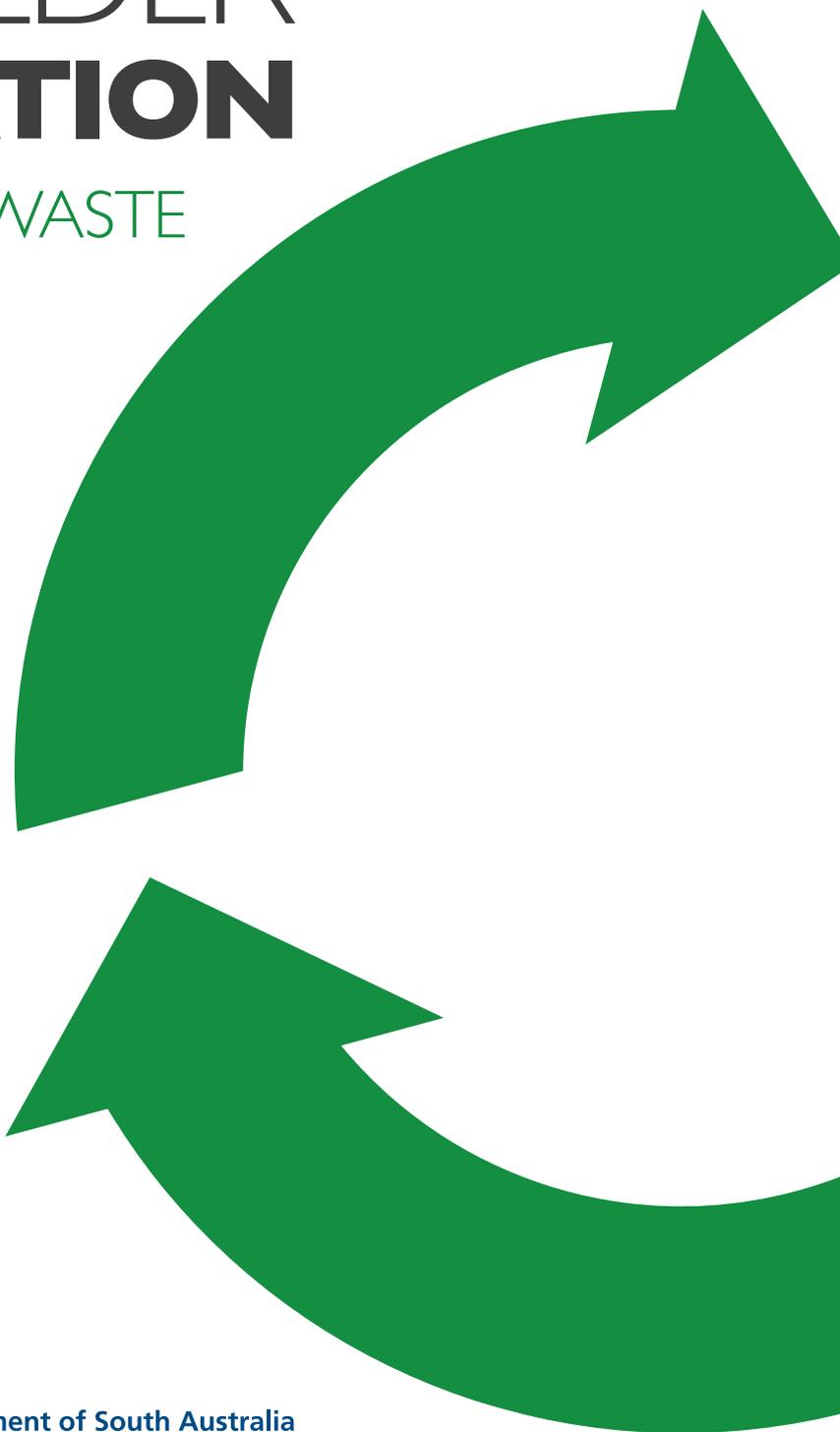


Summary of

# STAKEHOLDER CONSULTATION

SOUTH AUSTRALIA'S WASTE  
STRATEGY 2015-2020



**Government of South Australia**

Office of Green Industries SA

*An initiative of Zero Waste SA*

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# 1. INTRODUCTION

*South Australia's Waste Strategy 2015-2020* (the Strategy) recognises and builds on the achievements delivered through the two previous waste strategies for 2005-2010 and 2011-2015. It sets out objectives, targets, priorities for action and partnerships.

*The Review of South Australia's Waste Strategy 2011-2015* and its supporting report, *Economic Aspects of the Zero Waste SA Strategy Review*, provided a solid foundation to guide the development of the new waste strategy.

The Strategy provides a high-level approach to give a clear vision for the future. It recognises that the waste management sector returns an economic dividend to the State while protecting public health and the environment.

This direction supports a natural shift of focus within the waste industry, away from 'waste' towards 'resources' and to emerging concepts such as the circular economy, green economy, and the collaborative (or sharing) economy.

The new Strategy reflects these focus areas by introducing three new objectives:

- a resource efficient economy where the best or full value is secured from products and materials produced, consumed and recovered across the State
- a stable and efficient market for investors, essentially a clearly articulated policy framework that gives a solid platform for investment decisions
- a culture enabling the South Australian community, businesses and institutions to continue and strengthen their role in implementing zero waste strategies and programs locally, nationally and internationally.

The Strategy advocates a waste management approach that aims to: avoid the detrimental impacts associated with waste, recover resources, realise environmental, economic and social benefits, and continue along the road to a sustainable future.

A draft version of the Strategy was released earlier this year for eight weeks' consultation.

## THANK YOU

This response document addresses the key themes and issues emerging from the consultation process, many of which are now addressed in the new Strategy. While this response to submissions is not exhaustive, participants are invited to contact the Office of Green Industries SA (supporting Zero Waste SA) if further information is needed about the consultation process or the new Strategy.

“the economic value of the **waste management sector** is becoming equally important in **policy making**.”

## 2. HOW WE CONSULTED

A consultation paper, *Waste Strategy 2015-2020* (draft Strategy), was released for comment in March 2015. The consultation period closed on 11 May 2015. Several submissions were received and accepted after the due date.

The draft Strategy reflected on achievements of the past decade and clarified the policy context within which the new Strategy will operate. It identifies many challenges, opportunities and benefits associated with implementation of the new Strategy and emphasises the importance of partnerships and collaboration. As with previous waste strategies, targets and priorities for action are stated.

The community was invited to make submissions through a notice in *The Advertiser* and the draft Strategy was published on Zero Waste SA's website.

### PARTICIPANTS

We received 28 submissions from the following sectors:

#### State government

- Department of Environment, Water and Natural Resources
- Department of Primary Industries and Regions SA
- SA Water
- Environment Protection Authority

#### Local government

- Adelaide City Council
- City of Campbelltown
- City of Charles Sturt
- City of Marion
- Mid Murray Council
- Central Local Government Region of South Australia
- Fleurieu Regional Waste Authority
- Local Government Association of South Australia
- South East Local Government Association

#### Waste and resource recovery industry

- Australian Council of Recycling
- Hitachi Zosen Inova Australia Pty Ltd
- The Jeffries Group
- MacMahon Services
- ResourceCo Pty Ltd
- Suez Environment
- Tyrecycle
- Veolia Australia and New Zealand
- Waste Management Association of Australia (SA Branch)

#### Business

- Business SA
- Vinyl Council of Australia

#### Non-government organisations and individuals

- Food South Australia
- Mr Hugh Rigney, Macquarie University
- KESAB *environmental solutions*
- The University of Adelaide

In addition, a presentation was held on 28 April 2015 at a Waste Management Association of Australia (SA Branch) seminar attended by more than 40 people.

## 3. WHAT YOU TOLD US

The issues raised in submissions generally corresponded to the key sections in the draft Strategy:

- Scope of *South Australia's Waste Strategy 2015-2020*
- Achievements of the past decade
- New directions for South Australia
- Challenges and opportunities
- Partnerships
- Waste strategy for 2015-2020
- Strategic objectives
- Priorities for action.

Several submissions used the consultation process to raise matters of interest or concern (for example, accessing finance) that are not strictly directed at the draft Strategy but at the business of government and in particular, fiscal policy. These matters were noted but have not been addressed in the new Strategy.

A line-by-line analysis of each submission was undertaken, grouping responses by sector and against each of the eight key sections in the draft Strategy. Key points and issues have been extracted from submissions and where issues are particular to a specific sector, these are identified as such. Some submissions raised the same or similar points and issues when responding to different sections of the draft Strategy. To avoid repetition these are dealt with under the section heading of 'best fit'.

### **Scope of South Australia's Waste Strategy 2015-2020**

Submissions from all sectors generally supported the broad direction and intent of the draft Strategy, for example, some comments and issues included that the draft strategy:

- *delivers on expectations as a high level government policy document and provides the framework and broad directions for the waste and recycling sector for the upcoming years*
- *continues to support the resource recovery industry and is committed to driving South Australia to a resource efficient economy.*

Some reservations were expressed, such as:

- *The lack of detail makes it difficult to determine the effectiveness of the approach being put forward. Without additional information, the draft Strategy runs the risk of becoming a 'feel good' document that may not achieve the desired outcomes.*
- *The draft Strategy's overwhelming shift towards an economic focus in waste management is to the detriment of environmental and social considerations.*
- *Success to date could only be achieved by maintaining a strong partnership with local government and, in particular, an ongoing commitment from councils to implement environmentally sound strategies to reduce waste going to landfill and resource recovery.*

“submissions from all sectors generally **supported the broad direction** of the draft strategy.”

## Achievements of the past decade

Very few submissions commented on this section of the draft Strategy. The main area of concern expressed that: *building upon the achievements of the past will require resourcing and demand, continued and consistent strategic focus and links between key stakeholders including Green Industries SA, Environment Protection Authority, local government and the community as demonstrated during the past decade.*

## New directions for South Australia

Several submissions included comments from respondents indicating how they fitted within and contributed to the direction discussed in this section of the document.

Concerns were raised that critical State government waste management support functions will be lost under the term of the new Strategy and that new financing mechanisms to allow development of the green economy and tackling key issues should be investigated, including alternative financing mechanisms such as loans.

## Challenges and opportunities

Most submissions commented on this section of the draft Strategy with a range of comments and issues as follows:

### State government

- *It is suggested that an increased focus on preventative measures be included in the strategy – for example, reducing packaging so there is less waste and less waste to recycle.*

### Local government

- *Local government plays a significant role in waste management, and this role is changing. It is an expensive service and one that requires the State government to be clear and consistent when working within the sector, including policy and strategy development and application and use of the solid waste levy and Waste to Resources Fund.*
- *Providing state funding for waste infrastructure is seen as crucial to maintaining high performing waste and recycling systems in regional areas.*

- *The reuse of recycled products and the development of sustainable markets need to be developed at the same time. It is felt that this area would deserve more presence in the draft Strategy, including consideration of locally, nationally and internationally achievable solutions.*
- *There is a concern that realising the economic potential of the waste management sector, while aiming for 'zero waste', are competing strategic directions.*
- *More detail is required on affordability, cost/benefit of achieving strategic outcomes expected of councils, and also the role of fit for purpose waste management services to the community.*

## Waste and resource recovery industry

- *Investment in the resource recovery sector should be focused on creating demand for recycled end products.*

## Business

- *Support for 'remanufacturing' as an area of challenges and opportunities worthy of policy attention.*
- *The waste strategy should reflect the complexity of the markets and systems associated with the trading of secondary resources.*

## Non-government organisations

- *Both directly and indirectly, waste management engages with complex socio-ecological relationships. The way these interactions are thought out and rhetorically depicted in the draft Strategy is a key issue.*
- *Key to success will be ability to maximise resource recovery through reduced contamination, waste recovery and processing of more difficult waste streams. Innovation and technology will play an important part given waste streams will remain relatively static in current consumer and economic terms (scale of economy) during the five-year life of the Strategy.*

## Partnerships

Submissions from all sectors noted the importance of partnerships and collaboration. Some submissions highlighted the benefits of partnerships between the Office of Green Industries SA (supporting Zero Waste SA) and the submitter organisation. The following suggestions were also provided:

### Local government

- *There is urgent need to discuss the roles and responsibilities expected in the delivery of this Strategy. Linked to affordability, the local government sector is concerned that there will be greater expectation on councils to deliver the Strategy on behalf of the State government with little to no support to do so.*

### Waste and resource recovery industry / business

- *Mechanisms that build partnerships and collaborative arrangements beyond traditional funding models such as venture competitive capital funding, with funding tied to the objectives are critical.*
- *The success of the Strategy's implementation would be best achieved in partnership with business and other key stakeholders.*

### Non-government organisations

- *Encourage further collaboration with indigenous land managers and the inclusion of traditional knowledge in waste management practices.*

## Waste Strategy for 2015-2020

Submissions from all sectors responded to this section of the draft Strategy with suggestions for additional principles to guide the Strategy. There were some divergent views regarding the proposed vision and targets. Local government, in particular expressed concerns regarding ongoing costs and financial responsibilities associated with the broad direction for waste management suggested in the Strategy. Opinions regarding energy from waste also featured in many submissions.

### State government

- *Suggestion to introduce an evaluation program for the Strategy to demonstrate the areas it has made a difference.*

### Local government

- *The recognition of the complex challenges non-metropolitan entities are facing is critically important, however it is felt that more guidance and detail, potentially by way of example and comparison with other jurisdictions, would greatly support the efforts, in particular by local government, to implement modern waste and recycling principles in the regions.*
- *The diversion target numbers seem arbitrary with no cost/benefit analysis available to support the huge expense that would be needed to achieve likely minimal gain. The Strategy requires more strategic discussion around how diversion rates for municipal solid waste (MSW) have been developed and the strategies that will be implemented and supported by the government to achieve these targets.*
- *The 60% kerbside bin diversion target for MSW in the Strategy is tailored to a low density urban environment. This target will become increasingly difficult to attain and maintain with a rapidly growing population in the city directed to medium and high density residential developments, which typically provide a single waste stream (general waste).*

### Waste and resource recovery industry

- *The landfill disposal target for MSW should be increased to between 75% and 80% and this can be achieved through a well-coordinated policy and strategic approach with sufficient funding to new infrastructure systems to divert material from landfill to more productive economic uses.*
- *A stable and supportive regulatory framework is required to ensure remanufacturing operations remain viable.*
- *Cautions against energy from waste technologies that do not deliver and/or change feedstock inputs to 'higher order' materials following approval with potential adverse consequences to other businesses.*

### Business

- *Suggest that the implementation of management practices, data collection and systems that optimise environmentally sustainable design and the waste management hierarchy, be added as a further Strategy principle.*

## Non-government organisations

- *Ensure focus embracing regional and rural South Australians.*
- *Focus on difficult waste streams and hazardous wastes will provide opportunities for increased waste diversion, reduced contamination and potential for new technology and infrastructure, subject to scale of economy and long-term capacity.*

## Strategic objectives

Very few submissions commented on this section of the draft Strategy with general support for the objectives and recognition by business, that the right policy settings are required to enable the remanufacturing sector to grow and mature. Industry-to-industry linkages and initiatives should also be encouraged and promoted to ensure that valuable resources are not transported interstate or overseas but rather used within the State.

## Priorities for action

Most submissions commented on this section of the draft Strategy with a wide range of issues, views and opinions. Several submissions detailed how their activities and operations contribute to the direction of the Strategy; others sought clarification of meaning or suggested amendments to improve the content of the Strategy. Some additional comments and issues raised are detailed below.

## State government

- *Indicated how specific agency/organisational activities support the Strategy and suggest some content adjustments.*

## Local government

Several local government submissions identified the benefit of programs and activities previously undertaken by Zero Waste SA such as community based education and awareness, *Recycle Right*®, the Backlight household light globe collection and the household hazardous waste and farm chemicals collection programs. All local government submissions raised concern about how the priorities for action can be achieved with the transition to Green Industries SA and reduced financial resourcing from State government for such programs.

Local government submissions were particularly concerned about the potential financial costs for achieving the Strategy's priorities falling to councils. Concerns regarding illegal dumping including the costs associated with this were also prevalent in submissions. Other comments and issues included:

- *Procurement of remanufactured and/or recycled content products by local and State Government should be more strongly emphasised.*
- *Need to ensure that there is no cost shift to local government for implementation of actions that have previously been funded by State Government and to ensure that the objectives and targets of the Strategy are achieved.*
- *Concern about an absence of adequate reference to medium to high density residential and mixed use development and compatibility with stated diversion targets.*
- *The combined overall 70% diversion target with other MSW is a 'stretch' given that the diversion of other MSW in the target will require greater investment in infrastructure, public education and awareness and new recycling technologies to assist councils to achieve this target.*
- *Increasing the costs of landfill disposal and imposing landfill bans both make it more difficult for the average resident to dispose of their waste responsibly.*

## Waste and resource recovery industry

Similar to local government, a number of waste and resource recovery industry submissions advocated the benefits of government procurement to further the objectives of the Strategy. It was felt that further strengthening was required regarding the implications for waste management associated with higher density urban environments (multi-unit dwellings). Other issues and comments included:

- *Support for no further landfills servicing metropolitan Adelaide.*
- *Support for the waste management hierarchy so that materials are reduced, re used and recycled before going through to energy from waste facilities.*
- *The need for continued emphasis on education and awareness to reduce contamination.*
- *The Strategy should be underpinned with practical, fair and consistent regulation and enforcement.*

- *In the 'Priorities for action' section, there are limited actions associated with remanufacturing, which is regarded as a large opportunity for the State with associated infrastructure needs, product and market development.*

### **Business**

- *Larger businesses need policy settings that will enable them to continue to invest in infrastructure and hence drive change in their supply chain. Small businesses need assistance with cost reduction and finding new markets for their products.*
- *Energy from waste is an important area of development however, there would need to be a large degree of policy developments and policy certainty in this area to support any investment decisions.*

### **Non-government organisations**

Submissions suggested some fine tuning to this section of the Strategy, including:

- *Review the 'Priorities for action' to reflect a new focus on resource efficiency, including waste water (trade waste).*
- *Ensure that a well-developed communications strategy has a more prominent place in the Strategy document.*
- *There is a risk that data reporting (through the Zero Waste SA Environmental User System) will be adversely affected due to a reduced operating budget for Green Industries SA that is charged with the responsibility to deliver the Strategy, combined with possible disenfranchisement by some sectors (e.g. local government), leading to information input that may not be to the required standard.*

## 4. OUR RESPONSE

As a result of the consultation, most sections in the Strategy have been adjusted. The overall structure of the document has not been adjusted and much of the new content provides further context or clarity with several amendments occurring in the 'Priorities for action' section.

Significant changes include:

### Introductory chapters of the waste strategy

- Identifying the need for collaboration, partnering and resources to implement the Strategy.
- Further clarity regarding the Office of Green Industries SA and its support role for Zero Waste SA as follows:

*The Strategy has been developed during a period of transition in 2015-16 as the Government of South Australia realises its vision to establish a new authority, Green Industries SA. From 1 July 2015, following a proclamation under the Public Sector Act 2009, the department that supports Zero Waste SA (the Office of Zero Waste SA) will be known as the Office of Green Industries SA. During 2015-16, legislation to establish Green Industries SA, including a definition of its functions, will be developed. During this transitional period the Zero Waste SA Act remains operational, and the Board of Zero Waste SA will be supported by the Office of Green Industries SA.*

- Expanded discussion relating to challenges and opportunities with particular reference to:
  - » Discussion regarding benefits (resulting in a change to the section heading):
 

*The approach to waste management advocated in the Strategy is an opportunity not only to avoid the detrimental impacts associated with waste, but also to recover resources, realise environmental, economic and social benefits and continue along the road to a sustainable future.*

- » The circular economy and the collaborative economy:

*The circular economy seeks to shift activity from a linear to a circular model by making better use of materials, by keeping materials in circulation through reuse and recycling, industrial symbiosis and other efforts to divert materials from landfill.*

*It displaces some demand for new materials, but does not address the rate at which materials enter the circle, as evidenced by total material demand continuing to grow faster than the improvement in recycling rates.*

*While it is vital to maintain a focus on bending the linear economy into a circular one, thereby addressing the 'middle rungs' of the waste management hierarchy (recover, recycle and reuse), attention should also be focused on the most preferable 'rungs' of the hierarchy (reduce and avoid). The rapidly growing momentum of the collaborative economy (known as sharing economy or access economy) is a means of doing this.*

*It includes collaborative production as well as collaborative consumption, and is fundamentally reshaping how people buy and sell goods and services.*

- » Opportunities through procurement practices:
 

*Procurement policies and practices that support the use of remanufactured products is a key area where all levels of government can directly influence growth in the remanufacturing sector as well as realise environmental and social benefits such as reduced carbon emissions and increased employment.*
- » The changes in urban residential density and implications for strategy targets as well as opportunities for innovative systems design.
- » Further discussion regarding financial costs as well as social and environmental benefits arising from implementation of the strategy.
- » The influence of international markets for secondary materials.

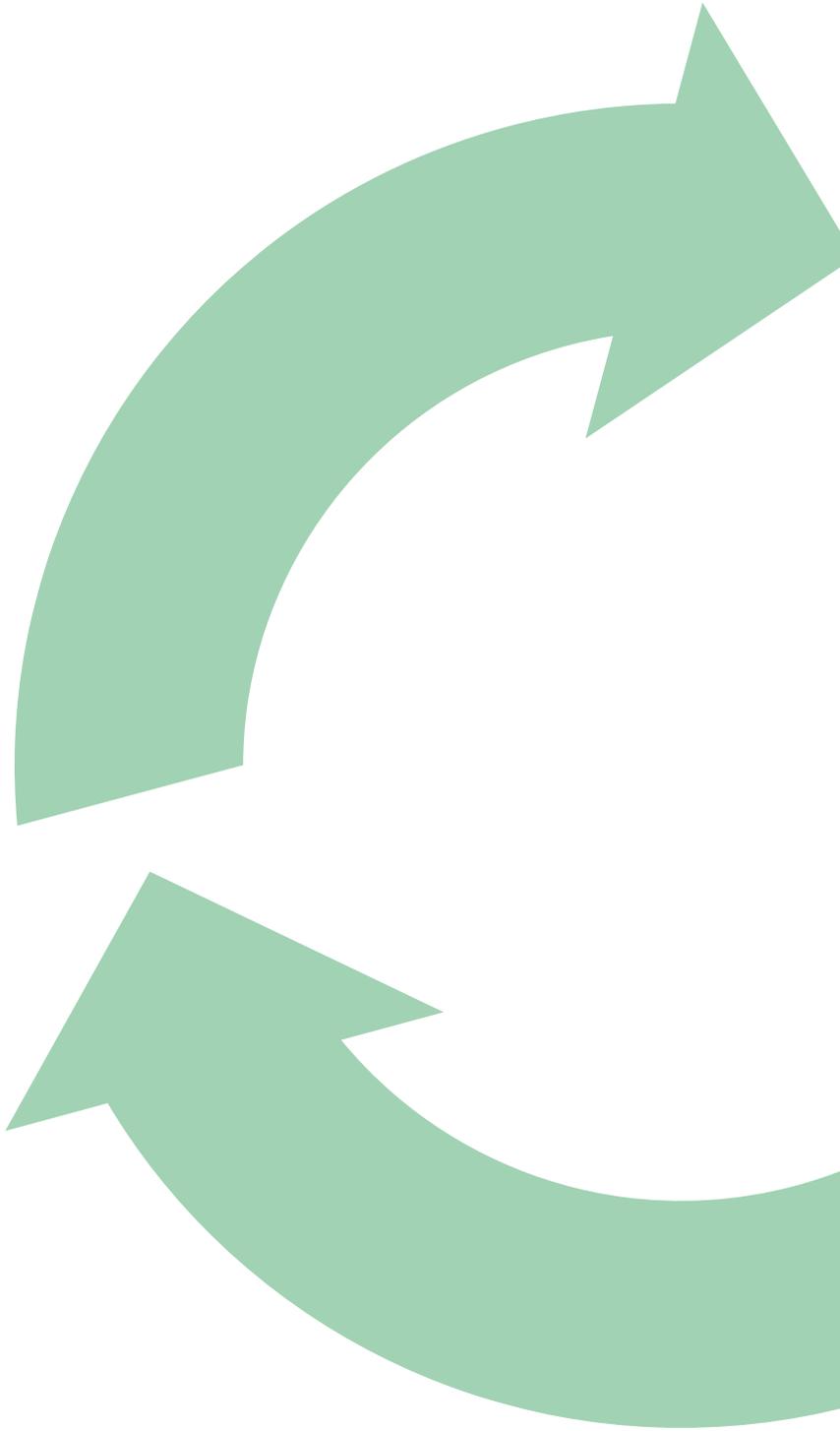
## The waste strategy itself

The following amendments have been made in response to comments submitted:

- Includes the requirement for a review of the Strategy during its five-year term.
- Recognition that in non-metropolitan areas, waste diversion should be maximised to the extent that it can practically and economically be achieved.
- Reference to implementing policy settings and regulation that drives progress and encourages long term investment decisions.
- Additional actions in relation to infrastructure needs for remanufacturing, the reuse of recycled products and the development of sustainable markets.
- Additional actions in relation to the State land use planning system and high performing waste collection methods for multi-unit developments as follows:
  - » ensuring planning decisions take into account the design of the built environment to enable safe waste management practices that support high performing recycling outcomes.
  - » promoting and encouraging developers, architects, planning authorities, waste consultants and industry and strata and community corporations to adopt the *Better Practice Guide Waste Management in Residential or Mixed Use Developments* in relation to waste and recycling services in higher density urban living.
- Reference to performance measurement in relation to multi-unit developments, including:
  - » implementing key performance measures for medium/high density and mixed use developments.
- Strengthening support for product stewardship, including:
  - » promoting the adoption of extended producer responsibility, including state-based approaches where considered necessary, and encouraging continuous improvement in existing producer responsibility and related schemes (for example in relation to televisions and computers (e-waste) and packaging).
- Additional priorities for action under the Industry Development section, including:
  - » promoting innovation in business sustainability and encouraging industry to industry linkages, collaborative consumption (for example shared access/monetisation of underused assets) and supply chain initiatives to enhance the potential for local benefits, including job creation.
- Additional actions in relation to sustainable procurement policies for all levels of government, including:
  - » encouraging all levels of government to consider adopting procurement practices and policies that have regard to the benefits of using remanufactured products and coordinating procurement efforts to achieve economies of scale and strengthen recycling markets.

## NEXT STEPS

The Board of Zero Waste SA (the Board) has considered the views and submissions gathered through the consultation process and resolved to forward the *South Australia's Waste Strategy 2015-2020* (the Strategy), as amended following public consultation, to the Minister for Sustainability, Environment and Conservation for his approval and presentation to government. Following consideration by government, the Board will adopt the Strategy and it will be released publicly through publication on the Zero Waste SA website.



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