

CONSULTATION SUMMARY REPORT

Accelerating SA's transition to a circular economy

SOUTH AUSTRALIA'S
WASTE STRATEGY 2025-2030



Government
of South Australia

Green Industries SA

Green Industries SA acknowledges and respects the Traditional Custodians whose ancestral lands we live and work upon, and pays respect to their Elders past, present and emerging. We acknowledge and respect their deep spiritual connections, and the relationship that Aboriginal and Torres Strait Islander people have to Country.

We extend our respect to all Aboriginal and Torres Strait Islander peoples and their nations in South Australia, and across Australia.

Green Industries SA also acknowledges that where Aboriginal and Torres Strait Islander people have a genuine say in the design and delivery of policies, programs and services that affect them, better life outcomes are achieved. Co-design is the preferred method of identifying and delivering the outcomes sought by communities in relation to projects, policies and programs that impact Aboriginal and/or Torres Strait Islander peoples.

Learn more about our Reconciliation at
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Contents

Introduction	4
About this consultation report	4
Thank you	4
Background	4
About the draft strategy	5
What we asked	6
Who we heard from	6
What we heard and how we responded	7
Summary of feedback	7
Strategic direction	8
Goals and targets	8
Focus Areas	11
1: Avoid waste	11
2: Reduce food waste	12
3: Reduce material loss and preserve value	13
4: Address emerging and problematic wastes	14
5: Develop and support circular markets and businesses	15
6: Build a circular built environment	16
7: Develop circular economy knowledge and skills	17
8: Measure our transition to a circular economy	18
9: Contribute to net zero emissions	19
Cross-cutting enablers	19
Other Areas	20
Other feedback raised	22
Appendices	24
Appendix A - List of respondents	24

Introduction

About this consultation report

This consultation report describes the information submitted to Green Industries SA (GISA) in response to a public invitation to provide feedback on the draft of *Accelerating SA's transition to a circular economy: South Australia's waste strategy 2025-2030* [the draft strategy]. It includes a summary of the key themes, responses to feedback and, where relevant, how feedback has influenced the final strategy. This summary and analysis of the consultation is published on the 'YourSAy' website and the GISA website as record of the consultation findings and outcomes.

Thank you

GISA thanks every federal, state and local government body, organisation and individual who took the time to offer feedback, knowledge and ideas, and in doing so, have contributed to the development of the strategy.

Background

The South Australian Government, through GISA, has a statutory requirement to develop a waste strategy for South Australia every five years. Subsection 18(4) of the *Green Industries SA Act 2004* requires GISA to take into consideration the views and submissions gathered through consultation on a draft strategy.

Public consultation on the draft strategy was conducted between 28 May and 23 July 2025. Engagement across multiple levels of government, the waste and resource recovery sector, other industry sectors, business and the community was supported by targeted and general forums, and direct communication. Responses were able to be submitted via a survey on the South Australian Government's 'YourSAy' website or through written submissions to the published GISA email address.

GISA received 158 responses through this consultation. Responses varied from short submissions highlighting a particular matter through to detailed submissions addressing each focus area. Responses received have been reviewed and summarised within this report.

About the draft strategy

The vision of the draft strategy is:

- To create a sustainable future, focusing on the value of materials in a circular economy and providing economic, social and environmental benefits

The objectives are:

- Continue South Australia's leadership in waste management and resource recovery, and accelerate our transition to a circular economy
- Use our natural resources more efficiently, focusing on sectors that use the most resources and where potential for circularity is high
- Support business sustainability and grow circular economy businesses and jobs
- Reduce waste and pollution and regenerate natural systems
- Create a circular economy culture and enable sustainable consumption choices

The draft strategy builds on the previous strategy *Supporting a circular economy: South Australia's Waste Strategy 2020–2025*, taking into account changing local, national and international trends, setting ambitious targets and goals and identifying priority areas where action is needed to expand on waste management and resource recovery efforts to accelerate South Australia's transition to a circular economy.

It sets an overarching goal to double South Australia's circularity rate by 2035, supported by 7 targets, and identifies 9 focus areas as the priority areas for action that provide the greatest opportunities to meet the strategy's objectives, goals and targets. These are:

1. Avoid waste
2. Reduce food waste
3. Reduce material loss and preserve value
4. Address emerging and problematic wastes
5. Develop and support circular markets and businesses
6. Build a circular build environment
7. Develop circular economy knowledge and skills
8. Measure our transition to a circular economy
9. Contribute to net zero emissions

The strategy also identifies several other areas that include relevant actions.

The draft strategy proposes to share responsibility for delivery of actions across state government, local government, business and industry, the education sector and community. It has been developed with input from key industry, business, state government and local government stakeholders and actions have been co-designed with those identified in the draft strategy as action leads.

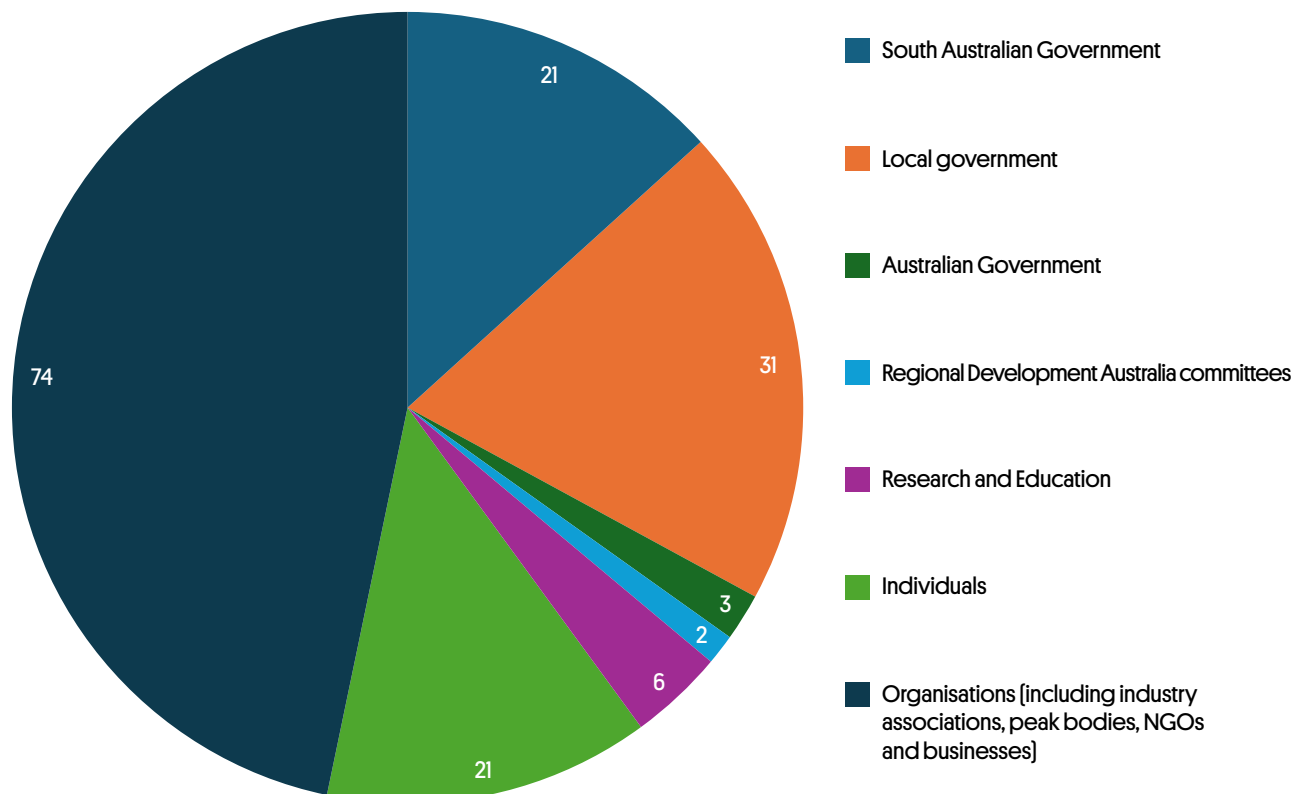
What we asked

Respondents were invited to comment on:

- overarching objectives
- goals and targets
- for each focus area:
 - » whether the actions support the objectives of the focus area
 - » ideas for additional actions to support the focus area objectives
 - » the appropriate partners for listed actions
 - » any barriers and how they might be addressed
 - » any additional comments
- any additional priority areas
- anything else relevant to the strategy

Who we heard from

Responses, including emailed submissions and surveys, were received from 158 respondents, representing a diverse range of stakeholder groups. These are grouped by sector in the pie chart below. A full list of respondents is provided at Appendix A.



What we heard and how we responded

Summary of feedback

Feedback received indicated an overall high level of support for the draft strategy.

There was strong support for the strategic direction and the ambition of the strategy. A few submissions described the strategy's targets as stretch targets, noting however the importance of working towards them to advance the circular economy in South Australia.

Feedback indicated that the focus areas reflected the key priorities for South Australia. While some submissions were broad and commented on each area of the draft strategy, many submissions were focused on issues specific to the respondent's sector or area of interest. Some comments related to the implementation of actions [e.g. cost or resource requirements specific to the organisations] rather than disagreement with the actions and intentions. Comments and queries regarding funding, priorities and timing for implementation of actions were raised by some as potential challenges to the achievement of the strategy's targets.

For other stakeholders, the key to success for the strategy will be ensuring that all elements of the circular economy are well supported, including, for example, providing access to training to create a skilled workforce, and ensuring that government procurement is aligned to the circular economy. Additionally, some noted that the focus should be on circular manufacturing to drive economic growth and reduce virgin material inputs, not just on waste diversion.

To accomplish the goals and actions of the draft strategy, extensive collaboration with all key stakeholders, particularly those listed as partners with responsibility for implementing actions, and measuring impacts of the strategy's actions, was viewed as necessary. Additionally, respondents considered that legislative change, householder and corporate behavioural change, and funding will be required to meet the actions within the focus areas. There were suggestions to further prioritise the list of actions or to extend the timeline further than five years to ensure success.

Areas with broad support

The following aspects of the draft strategy received broad support from all sectors and have been retained with minimal amendment in the final strategy:

- ✓ Strategic direction, including overarching framework and guiding principles
- ✓ Overarching goal to double SA's circularity rate
- ✓ Targets
- ✓ Priority areas for action [focus areas]
- ✓ New approach of identifying action leads and partners, enhancing accountability and transparency

Key changes

Changes made in response to feedback include:

- ✓ Two new overarching objectives
- ✓ Updated list of action leads and partners, including additional partners
- ✓ Action timeframes updated to reflect priorities
- ✓ Clearer links between circular economy strategies and climate change mitigation
- ✓ More clarity in the section on energy from waste
- ✓ New section on mineral resources
- ✓ Linking of actions to existing actions in other government strategic documents
- ✓ Revised actions [as outlined in the next section]

Strategic direction

The strategic direction was strongly supported by respondents.

Many respondents wanted to see the strategy place greater responsibility on producers and manufacturers, with a greater emphasis and commitment to extended producer responsibility.

Some respondents raised that while 'zero avoidable waste to landfill' is no longer a target, it is still a worthwhile ambition. Other respondents suggested that the strategy's emphasis on reducing reliance on virgin resources should also be reflected in the Objectives and that the order of the list of objectives should be changed.

Our response

The strategic direction of the draft strategy has remained the same, while further content and objectives, reflecting feedback received, has been added.

Key changes

- ✓ Adding more focus on extended producer responsibility through including an additional objective to increase producer responsibility for products throughout their lifecycle, and by expanding this focus through contextual information across multiple focus areas
- ✓ Adding a new objective to "prevent all avoidable waste being disposed to landfill"
- ✓ Adding reference to reducing reliance on virgin resources into the objectives
- ✓ Reordering the list of objectives

Goals and targets

There was acknowledgment that the goals and targets were ambitious, and potentially complex to measure, but if reached will represent an important step forward for the circular economy transition in South Australia.

Overarching goal: Double SA's circularity rate by 2035

Although considered ambitious, the overarching goal was generally supported by the submissions, with feedback also noting its alignment with Australia's Circular Economy Framework. Respondents from the waste and resource recovery industry considered that greater support for businesses creating recycled products along with a strong commitment to adopting sustainable procurement practices, will assist with reaching this overarching goal.

Target 1: 10% reduction in material footprint by 2035

Feedback received noted the alignment with Australia's Circular Economy Framework and was supportive of the inclusion of this new target. It was raised that designing products and materials for longer life can result in an increase in material footprint but that this can be offset by a corresponding increase in material productivity.

Target 2: 30% increase in material productivity by 2035

Feedback received noted the alignment with Australia's Circular Economy Framework and was supportive of the inclusion of this new target. One submission noted that repair activities increase the productivity of materials.

Target 3: 10% reduction in total waste generated per person by 2030

The ambition of the target to reduce waste generation was supported, however some respondents raised that it may be challenging to achieve a 10% reduction by 2030 without substantial regulatory reform measures and behavioural change across community and business practices.

It was noted that product design, products and packaging have a significant influence on the achievability of this target.

Some councils noted that they can support this target through community education, and enabling resource sharing and circular initiatives, with many already running local programs of these nature. Some noted that this target could be one of the more achievable targets if combined with behaviour change programs, accessible infrastructure and consistent messaging.

Target 4: Increase resource recovery and reduce contamination

The majority of the feedback on this target area related to the metropolitan Adelaide municipal solid waste (MSW) and kerbside bin targets with some respondents reflecting that significant effort is needed to meet the MSW, kerbside bin and commercial and industrial (C&I) waste diversion targets.

Submissions from local government expressed a desire to continue to work closely with GISA in working towards targets through actions across focus areas 2, 3 and 4.

While the ambition of the new targets to reduce contamination in kerbside bins in metropolitan Adelaide was supported, concern was expressed by some councils about the achievability of the targets within the strategy's timeframe of 2030.

It was raised that if residents do not have viable options for disposing of difficult or harmful waste, they are less likely to do the right thing. Another barrier raised was the difficulty experienced in shifting householder behaviour. Councils noted that despite communications campaigns and bin tagging, behaviour change is not necessarily sustained over the longer term. The need for a consistent waste audit methodology was raised, [being an action in the draft strategy that is already underway].

Other challenges raised included that bags not covered under South Australia's single-use plastics regulations may not be certified compostable. If information on end-of-life disposal is not provided on other packaging items it can lead to items being misidentified and placed in the incorrect bins.

Recycling industry submissions advocated for greater pre-collection education and kerbside inspection programs. Organics recyclers suggested extending the contamination targets for organics beyond kerbside bins, to the C&I sector.

It was noted that to achieve the kerbside bin targets for waste diversion and contamination, there is a need for statewide coordination of education, processing infrastructure and community engagement.

A waste and resource recovery industry respondent commented that the proposed actions for improving C&I diversion were limited to increasing the source separation of C&I materials without actions to ensure that this is supported by resource recovery infrastructure to process the separated materials.

Respondents broadly supported the approach of not setting specific targets for regional, outback and remote areas, recognising these areas have different challenges and needs which are best addressed through localised strategies and place-based solutions.

Target 5: 50% reduction in organics disposed to MSW kerbside and C&I landfill bins by 2030

Recognising the importance of reducing the disposal of organics to landfill, the ambition of this target was broadly supported. Challenges identified by council submissions included the current legislative requirement for metropolitan Adelaide councils to provide a weekly collection of general waste, which is seen as a cost barrier to councils providing weekly organics kerbside bin collection services.

Target 6: Maximise material circularity

This target was a focus of some industry submissions, with discussion tending towards respondents outlining how their technologies or processes could contribute to achieving this target.

One submission proposed that organics derived from residual waste be recognised as a circular output and included in diversion metrics. Other submissions supported prioritising source separation of organic waste to achieve high quality compost outputs to improve soil health outcomes.

Other submissions suggested including additional priority material types for this target, with both e-waste and timber suggested. A suggestion in another submission was that this target be broadened beyond material circularity to include energy circularity.

Target 7: Increase circular consumption activities

Similarly to Target 6, some respondents commented on how their technologies and approaches can assist in increasing circular consumption by targeting the highest tiers of the waste management hierarchy.

Council submissions recognised that this is an important target, but for councils to be involved in initiatives such as repair cafes, sharing libraries and reuse hubs, there is the need to further explore funding, partnerships, staffing and community buy-in. Submissions recognised that to increase circular consumption there is a need for communication, training and behaviour change.

Our response

Since the draft strategy was released, the CSIRO has provided the state government with material flow data for the period 2010-2024 for the new metrics of circularity rate, material footprint and material productivity. This data has enabled the addition of graphs and the updating of baselines for the overarching goal and targets 1 and 2.

While recognising that some of the targets are ambitious and may be a challenge to achieve within the timeframes set, it has been decided that the ambition of the targets and timeframes will be retained. Progress against these will be monitored and, where necessary, strategies and programs can be amended during the lifetime of this strategy to support continual progress towards achieving the targets.

In response to concerns expressed about the lack of actions to ensure the availability of infrastructure to support progress towards the C&I waste diversion target of 90% by 2030, it is considered that existing actions under 'Build resource recovery capacity and infrastructure' (focus area 3), paired with actions to increase source segregation of C&I waste (including food waste), providing support to businesses, and prohibiting disposal to landfill of C&I collected organic waste, will enable progress towards this target.

Since September 2024, plastic shopping bags and plastic barrier bags used for unpackaged fresh fruit, vegetables, nuts, confectionery have been subject to bans in South Australia. To comply with the regulations, all Australian Standard certified compostable barrier bags must be clearly marked with the certification details. To support correct disposal, *Which Bin?* educational resources and campaigns promote the certification logos and only using certified compostable bags to divert food waste. The ban on plastic barrier bags and requirement for compostable alternatives supports household food waste diversion participation and reduces the risk of conventional plastic bags being used for this purpose.

While more detail was sought on how the new targets of material circularity and circular consumption activities will be measured, the development of these new metrics has not yet been completed. Once finalised, it is intended that this information will be shared on the GISA website, and data collection and reporting against these will then commence.

Key changes

- ✓ Time series data for the new circular economy goals and targets of circularity rate, material footprint and material productivity has been added, including a comparison with Australia's data
- ✓ Adding 2 new actions to support achieving the kerbside bin contamination targets
- ✓ Amending how waste generation per person [target 3] is measured, by excluding separately reported materials¹, to more accurately measure the impact of the strategy's waste reduction strategies and actions. A new 2024 baseline for this target has been set, reflecting this new approach
- ✓ 'Consumer electronics' has been included in Target 6 as a material type where greater material circularity is needed

¹ 'Separately reported materials' comprise of clay, fines, rubble, soil and fly ash. These materials can fluctuate significantly across years, reflecting the waste generated particularly by large infrastructure and development projects.

Focus Areas

1: Avoid waste

Respondents strongly supported the ambition to avoid waste, accompanied by the list of objectives for how this can be done.

Many submissions identified product design and marketing decisions as the most significant contributors to growing waste generation, with product design standards, extended producer responsibility (including product stewardship) and sustainable procurement identified as key levers to create change. Councils and waste and resource recovery operators provided feedback that they often bear the costs of poor product design, including packaging.

Several submissions provided useful information on how design and manufacturing decisions can impact the repair, reuse and durability of a range of product types.

Submissions from councils and industry raised concerns that the draft strategy relies too heavily on voluntary action and advocacy, and lacks sufficient commitment to regulatory reform. These submissions called for mandatory product design standards and bans on unnecessary packaging materials.

Education was repeatedly mentioned as a foundational requirement to enable waste avoidance behaviour, with submissions from non-government organisations calling for education to be an embedded component of every focus area.

Many submissions noted the need for longer term funding for waste avoidance measures, including community circular hubs, repair cafes, and education, to ensure these initiatives are sustainable, with the solid waste levy suggested as a funding source.

The positive social outcomes of community waste avoidance initiatives were highlighted by several submissions.

Several submissions noted a lack of clarity in the action on standardised waste reporting.

Our response

There is a limitation on what policy and legislative actions can be taken at state level due to jurisdictional powers. While the draft strategy is unable to commit the Australian Government to specific actions, it can however reflect the position or action that SA is advocating for at the national level.

It is also important to note that although the strategy does not identify or commit any funding, resourcing considerations (including constraints) have been considered in its development. Feedback and information provided during strategy consultation will be considered when developing funding programs and initiatives to implement the actions in the finalised strategy.

Key changes

- ✓ Adding separate timings for national advocacy and state-based legislative reform work within design standards actions
- ✓ Moving an action on repair and reuse education from focus area 7 to this focus area, to pair education with the other 'repair and reuse' actions
- ✓ Updating the action on standardised waste reporting to improve clarity on what is intended
- ✓ Adding additional context regarding the role of product stewardship in encouraging and supporting design changes, additional design barriers to reuse, repair and durability, and the social benefits of a more circular economy

2: Reduce food waste

There was strong consensus across sectors that reducing food waste should be a priority, with widespread support for actions relating to food rescue, food waste avoidance and increased source segregation and resource recovery.

Many councils identified barriers to increasing recovery of food waste, including planning codes which do not support food waste recovery infrastructure in new and existing high-density housing, and the requirement of the *Environment Protection (Waste to Resources) Policy 2010* for councils to provide a weekly general waste collection service to their residents. Submissions noted that this requirement can make it financially challenging for councils to provide weekly food organics and garden organic (FOGO) collection services, which have been shown in numerous trials to increase resource recovery.

Several respondents wrote about the need to support businesses to better manage their food waste through both reduction and source segregation, and to ensure consideration of the diversity of hospitality businesses when creating resources to support and encourage this.

Calls were also made to better integrate food rescue, particularly through logistical and infrastructure funding, into the strategy.

Regional councils noted that the cost of transporting collected segregated organic materials to composting facilities presents a significant barrier to improving diversion of organics from landfill in regional areas with one suggesting that the transport subsidy for kerbside recyclables be extended to include organics.

Feedback received from the biochar industry noted the potential of biochar as a solution for food waste, as well as for contaminated organics streams.

Respondents noted that behaviour change campaigns are critical to reducing household food waste and improving food waste diversion behaviour.

Our response

The state government is committed to continuing to work with local government in the provision of effective waste management services for households which support the recovery of organics, such as through use of the *Sustainable Kerbside Services: Better Practice Guide* and adoption of sustainable kerbside service models.

Community support is critical for broader legislative changes to be considered. Councils are encouraged to continue working with their communities to implement behaviour change and continue to engage with the Environment Protection Authority (EPA) and GISA as this progresses.

Focus area 3 includes an action for GISA and the Department for Housing and Urban Development to investigate legislative and policy reform to support the implementation of best practice waste management in residential and mixed-use developments.

Support for businesses to reduce waste generation within their operations is included in focus area 1, and support for increased source segregation has been added to focus area 3.

The strategy is intentionally technology agnostic, focusing on the application of principles and outcomes sought.

Key changes

- ✓ Adding a new action led by GISA, partnering with the Department of Human Services, to support increased infrastructure capacity of food rescue and expand social supermarkets

3: Reduce material loss and preserve value

Respondents strongly supported focus area 3, highlighting alignment with core circular economy principles and the importance of retaining material value through design, recovery and local remanufacturing.

Many respondents called for more focus on regional South Australia. Suggestions included support for flexible and fit-for-purpose waste collection models tailored to the specific needs of regional councils, a zoning structure that acknowledges the challenges specific to South Australia's metropolitan, regional and remote areas, and support to identify and meet the infrastructure gaps that exist in regional and remote South Australia for safe material recovery.

Council submissions identified significant challenges to achieving the contamination targets set by the strategy and called for more actions to specifically address contamination in kerbside bins.² A submission from the waste and resource recovery sector also called for more support for businesses to reduce contamination in the C&I waste stream.

Councils identified public place recycling and organics bins as a challenge due to the potential for high contamination rates and called for more support to reduce contamination before public place bins are rolled out more widely.

Some submissions questioned the use of “advocate”, rather than “support”, in the action regarding accessible and convenient community drop-off for products and materials.

Feedback called for the expansion of the Container Deposit Scheme to include wine bottles.

Our response

Focus area 3 has been restructured to provide more clarity on which actions apply to metropolitan Adelaide only, which apply to regional South Australia, and which apply statewide.

For public place recycling and organics bins, the action applies only to suitable sites. As lead on this action, GISA acknowledges the need for support to manage contamination in public place bins, coupled with the selection of suitable sites, ahead of a broader roll-out.

Since the release of the draft strategy, the state government has committed to expanding the Container Deposit Scheme to include all beverage containers up to 3 litres (excluding plain milk), which includes wine and spirit bottles. The finalised strategy has been updated to reflect this commitment.

Key changes

- ✓ Expanding actions and content on regional SA and restructuring the action list to clarify the actions that apply to certain South Australian regions, and those that are statewide
- ✓ Adding two new actions to support achieving the kerbside contamination targets
- ✓ Splitting an action in focus areas 1 regarding supporting businesses into separate waste reduction and waste diversion actions, and moving the waste diversion action to focus area 3
- ✓ Clarifying that advocacy for accessible and convenient community drop-off is in relation to product stewardship schemes
- ✓ Adding a dot point to the action on a regional-specific Sustainable Kerbside Services guide to identify examples of innovative, practical and cost-effective approaches for regional and remote areas where 3-bin services aren't appropriate, and support development of guidance for these
- ✓ Adding regional circular transition roadmaps to the action regarding place-based solutions that achieve circular economy outcomes in regional areas, to acknowledge the need for region-specific transition planning

² See feedback under ‘Target 4’ *Goals and Targets* for more detail

4: Address emerging and problematic wastes

There was broad support for the need to prioritise addressing emerging and problematic wastes and that the material streams identified are priorities for action. There was a strong consensus that batteries are the most urgent priority given the high risks associated with improper disposal of used batteries, with concern expressed specifically about the safe transportation, storage, handling and disposal of waste lithium-ion batteries. Some submissions suggested additional materials for inclusion, including waste tyres and plastic cigarette filters.

Respondents agreed that the overarching aim of this focus area should be a clear focus on waste prevention and reduction, including through redesign, rather than solely managing problematic products and materials after they arise. One organisation suggested there was a need for a dedicated action for research and development to improve the management of all emerging and problematic wastes at both the design and end-of-life stages. Some submissions highlighted critical gaps in regulation, infrastructure and public communication that hinder the effective management of emerging and problematic wastes.

Some respondents expressed concerns around the potential greenwashing of 'compostable' plastics that are placed on the market if they are not certified to Australian Standards for compostability, as well as inconsistent labelling of compostable items. Respondents were also concerned about per- and polyfluoroalkyl substances (PFAS) in both compostable and non-compostable plastic packaging.

Concerns were also expressed about the slow rollout of regulated product stewardship schemes, with many national regulated product stewardship schemes being delayed, and voluntary schemes underperforming. Respondents particularly noted the lack of action around solar photovoltaic (PV) systems, household e-waste, and tyres. Several submissions emphasised the urgency of taking action at the state level in the absence of a national solution, especially for products that pose safety risks or contaminate existing recycling streams, with some calling for state-based regulated product stewardships schemes.

Our response

While the development and implementation of nationally regulated product stewardship schemes is the preferred approach (due to resourcing limitations and for national consistency), consideration of state-based legislative solutions has been included where there is urgent need for action coupled with a lack of progress at the national level, for example with batteries.

Under South Australia's *Single-use and Other Plastic Products (Waste Avoidance) Act 2020*, cups, bowls and containers (including lids for all these items) of any material that are lined with a waterproofing polymer (including products coated aqueously) must be certified to Australian Standards (AS) for compostability, AS 4736 or AS 5810, to be considered exempt from the regulations. From 1 March 2026, the exemptions will only apply to AS certified compostable food and beverage containers that are clearly labelled as, or otherwise marked in a manner that indicates that the container is home compostable, both home compostable and industrially compostable, or industrially compostable (as applicable).

No additional problematic wastes were added to the strategy, however actions regarding advocacy for a national regulated tyre stewardship scheme, as well as interim measures, are included in the 'Outback SA' section of focus area 3, reflecting the particular challenges of tyre waste in these areas.

Key changes

- ✓ Adding a new action to contribute to the development of a national guideline for the safe transportation, storage, handling and disposal of waste lithium-ion batteries
- ✓ Adding a new action to support research and development into circular solutions for problematic and emerging wastes, including design, alternatives, and end of life
- ✓ Amending the action to support the national packaging reform process to include addressing chemicals of concern (which includes PFAS)

5: Develop and support circular markets and businesses

There was strong support for this focus area as a priority area, with respondents noting the need for strong markets for recycled content and circular products to provide certainty for industry and encourage investment. Respondents from the waste and resource recovery industry shared that many recyclers struggle to secure consistent demand for recovered materials, with the problem being worse in regional areas.

To increase demand for recycled content and support recyclers, respondents highlighted the need for further support to encourage and enable the use of recycled material in place of virgin input, the need to preference domestic recycled content where possible, and the need for products manufactured using recycled content to be recyclable themselves.

Of the submissions commenting on this area, most respondents named government procurement as the most important lever to generate and sustain market demand for recycled content, calling for mandatory or incentivised recycled content targets or standards across state and local government. This was echoed in feedback received on other focus areas, with government procurement recognised as having a role to play in avoiding waste and creating a circular built environment. Respondents called for leadership from government in this area.

Feedback was received from councils on the action relating to local government procurement, noting that while there was support for circular procurement, reporting requirements should not be overly burdensome on local governments.

Respondents from a range of sectors also highlighted the need for increased support for innovation, including digital and systems innovation, support across all stages of product development, and finding new markets for products before they become waste.

Additional barriers raised include a lack of circular business accreditation or trusted verification systems, and a lack of access to finance and large buyers for startups and small businesses.

Our response

In recognition of the pivotal role that public procurement plays in the transition to a circular economy, and the importance of demonstrating leadership, the draft strategy included an action for a South Australian whole-of-government approach to environmentally sustainable public procurement (plus related supporting actions). The wording of the key draft action has been changed slightly to provide more flexibility in the implementation approach however the intent of the action remains the same.

In relation to the local government procurement action, the intent of the action was for the Local Government Association of SA (LGA) and GISA, in partnership with local government, to encourage local government to develop and implement environmentally sustainable procurement policies and practices, including determining their own internal performance indicators and processes for measuring and reporting, reflecting desired outcomes and available resources. While alignment and collaboration opportunities between local governments are referenced in the action, the wording of the action still emphasises that the measurement and reporting against performance indicators is an internal council matter.

Key changes

- ✓ Adding a new action to advocate for the development of national policy mechanisms that enable and encourage the use of domestic recycled materials in place of virgin inputs
- ✓ Expanding the section on increasing the use of recycled content to include the preference for domestic recycled content, and recycled content products that are themselves recyclable
- ✓ Expanding the section on innovation to better reflect the types of innovation that are needed to enable the circular economy transition

6: Build a circular built environment

There was strong support for the inclusion of the built environment as a priority area in the transition to a more circular economy.

Submissions showed clear support for embedding circular economy principles into the built environment sector and disciplines, including through circular design, adaptive reuse, retrofitting, modularity, using recycled content products and minimum standards. Recognising that South Australia already has a very high recovery and recycling rate for construction and demolition (C&D) waste, there was strong agreement that focus needs to be on reducing construction waste, and designing and constructing buildings to have longer lifespans.

Feedback agreed that environment and circular economy policy needs to be integrated with planning legislation [specifically the South Australian Planning and Design Code] and encouraged the setting of material reuse targets and expansion/integration of the measurement of embodied carbon. One submission suggested making the connection clearer between circular economy strategies in the built environment and emissions reduction.

Another submission pointed out the importance of product stewardship for products used in construction and office fit-outs for improving circularity outcomes. Other submissions reflected that decisions made as part of the procurement and design processes influence the circularity of a building.

Feedback showed support for training of built environment decision-makers in circular principles and design. Submissions also noted the need for skills and training, including micro-credentials, for built environment trades, designers and council planning and development staff. Several organisations advocated for investment in infrastructure, material libraries, and regulatory levers to enable circular construction at scale.

Key barriers identified included misaligned planning codes, insufficient data and tools for assessing material circularity, a skills gap in the industry workforce, recovery metrics focused on volume over value and public procurement practices that do not support circular design standards.

Our response

Feedback confirmed that the objectives of this focus area reflect the outcomes sought and that the actions listed would support the achievement of the objectives. The actions were retained with only minor changes to the wording of actions and some changes to the listed leads and partners.

Key changes

- ✓ Adding detail about the Australian Government's *Net Zero – Built Environment Sector Plan* released in 2025, including the circular economy strategies listed in the Plan identified as pathways to reduce emissions
- ✓ Adding information about how product stewardship schemes can improve circularity outcomes in built environment projects
- ✓ Adding information about the importance of procurement decisions and referenced the guide developed by the Green Building Council of Australia - *A practical guide to circular procurement for new buildings and major refurbishments*

7: Develop circular economy knowledge and skills

There was strong support for building knowledge and skills as essential enablers of the circular economy. Stakeholders emphasised the need for technical, vocational and community-level education to equip workers, councils and the public with practical capabilities.

Several submissions noted a mismatch between the ambition of the strategy and the current availability of skills or training to implement it, highlighting the importance of action in this focus area. Micro-credentials, TAFE reform, industry–education partnerships and support for regional and place-based delivery were all recommended to address this. Smaller councils and community organisations particularly stressed the importance of shared services, access to expertise and ongoing behaviour change support.

Knowledge sharing platforms were raised as a way to share knowledge about circular economy activities, including case studies on circular businesses and products. Supporting the emergence of circular economy champions across policy, industry, and community sectors was encouraged.

Some submissions pointed out that short-term education campaigns fail to build long-term behaviour change. The importance of culturally appropriate education was also raised. Stakeholders identified additional skills that will be needed for the circular economy transition.

Our response

Feedback confirmed the strategic direction and objectives of this focus area are appropriate, therefore these have been retained without change. Small changes to content and some actions have been made to reflect information provided.

Key changes

- ✓ Adding content about the challenges faced by regional SA in accessing TAFE or vocational education
- ✓ Expanding the list of skills needed for the circular economy
- ✓ Moving the action relating to reuse and repair education to focus area 1
- ✓ Adding reference to supporting and recognising circular economy champions into an action
- ✓ Adding a new action about knowledge sharing platforms

8: Measure our transition to a circular economy

Submissions strongly supported the expansion of metrics beyond waste diversion to include measuring circularity outcomes, and the importance of tracking circular economy progress using diverse metrics. Stakeholder feedback emphasised the need for robust and practical measurement systems to enable this. The importance of national data harmonisation was raised, as was aligning with Australia's Circular Economy Framework.

Some submissions offered suggestions on additional circular economy indicators that are more granular than the macro level circular economy metrics in the draft strategy, including impact-based metrics. These included, for example, avoided greenhouse gas (GHG) emissions, circular economy jobs created, circular economy Gross Domestic Product (GDP)/State Domestic Product (SDP) contribution, and reuse activities.

Councils raised that reporting of household waste generation and resource recovery data is already a significant burden for local government and this is particularly so for regional councils due to fewer resources. It was raised that kerbside waste audits are expensive and that support for any additional measuring or reporting would be needed. There was recognition that a standardised audit methodology is needed to provide consistency in data across SA as these currently vary between councils and regions, which supported the inclusion of this action in the draft strategy. Some submissions raised that real-time or digital bin performance tools could help reduce audit frequency.

There was concern expressed about the potential for benchmarking of local government arising from an action in the draft strategy for local government to provide information within their strategic documents relating to their waste management, resource recovery and circular economy goals to GISA and to publicly share progress against their goals and targets through their annual reports.

Our response

The strategic direction and objectives of this focus area have been retained unchanged.

Concerns raised by local government regarding two actions in the draft strategy have been addressed through amending or deleting actions.

Indicators that will enable measurement and tracking of target 7 (circular consumption activities) are being considered and developed. These will include measurement of reuse activities.

Consideration is being given to how GISA can best support and work with councils undertaking kerbside bin audits, to enable measurement and tracking of kerbside bin contamination rates against the strategy's targets. Communication with councils and other key stakeholders will be undertaken regarding this.

Key changes

- ✓ Amending an action to consider mandatory reporting by local government to state government, to instead considering options for a more streamlined approach to data reporting, and adding the LGA and Local Government Grants Commission as partners
- ✓ Deleting an action proposing that local government provide copies of their strategic documents to GISA and publicly share progress against their goals and targets through their annual reports
- ✓ Updating the timeline for actions to provide more clarity on priorities
- ✓ Broadening the action proposing to develop a comprehensive circular economy monitoring framework to encompass consideration of other circular economy transition indicators

9: Contribute to net zero emissions

There was strong support for the ambition and objectives of this focus area, and recognition of how the strategy can contribute to achieving net zero emissions in South Australia.

Feedback received suggested that the strategy could identify and measure the avoided emissions against actions. There was also a call for clearer alignment between carbon, waste and materials policies and links between circular carbon metrics and emissions reporting.

One submission suggested that actions that align with actions within *South Australia's Net Zero Strategy 2024-2030* should be identified and linked.

Our response

The strategic direction and objectives of this focus area have been retained unchanged, reflecting the strong support expressed in submissions.

While the draft strategy included a table of the environmental benefits of recycling SA materials, listing the GHG emissions, energy and water saved by material types (see Appendix B, Table 2), consideration will be given to future measurement of avoided emissions achieved through implementation of the strategy's actions.

Some changes have been made to actions. This includes deleting one action arising from recent considerations by the EPA of policy proposals consulted on through their review of the *Environment Protection (Waste to Resources) Policy 2010*. The Australian Government's Australian Carbon Credit Unit Scheme is the primary driver for LFG capture and is currently under review by the Australian Government. The other is a wording change to reflect feedback received.

Key changes

- ✓ Deleting the action proposing consideration by the EPA of legislative options to maximise capture of greenhouse gases from landfill
- ✓ Expanding the action regarding the development of embodied carbon metrics for the built environment to include circularity metrics and adding an additional partner
- ✓ Adding reference to avoided emissions co-benefits of circular economy initiatives in other focus areas
- ✓ Adding footnotes to actions that align with actions in other state government strategic documents, including *South Australia's Net Zero Strategy 2024-2030*
- ✓ Adding reference to the Australian Government's *Net Zero – Built Environment Sector Plan* in focus area 6 [Build a circular built environment]

Cross-cutting enablers

There was little specific feedback regarding the cross-cutting enabling actions, other than general support for the application of circular economy principles across state government policies, strategies, legislation, programs and services where relevant.

Other Areas

Energy from waste

Feedback received covered a diverse range of opinions on energy from waste (EfW), with differing levels of support expressed regarding the role of EfW in SA. Community organisations and individuals were wary of this waste destination pathway, noting concerns with the potential for air pollution, and the importance of prioritising activities higher up the waste management hierarchy, such as reuse and recycling. While some submissions from the waste and resource recovery industry supported the role of energy recovery in the transition to a circular economy, this was not consistent across responses from this sector. Of the respondents that supported this pathway, many provided detail on the technologies available.

The waste management hierarchy was an important consideration for many respondents when it came to EfW, with some organisations raising concerns about thermal EfW being conflated with circular energy recovery processes, and others noting the need for regulatory enforcement to prevent the incineration of recyclable materials.

Submissions noted the need to ensure the distinction between various forms of energy recovery from waste was clear, with some highlighting the different outcomes achieved by different EfW technologies. Examples of these were anaerobic digestion and biochar production where material outputs are produced as well as energy recovery. Some submissions asked for EfW technologies to be treated differently depending on the outcomes achieved and others sought a risk-based approach.

Regional councils pointed out the benefit of exploring small scale community-based bioenergy solutions that could provide local benefits and reduce material sent to landfill.

Several submissions noted that some processes used for EfW could also be used for recycling segregated materials, such as the use of pyrolysis and gasification in the advanced recycling of plastics and suggested that this be made clearer in the draft strategy.

Our response

The 'energy from waste' section has been rewritten to clarify which activities are considered circular, and where non-circular EfW activities may have a role to play in South Australia.

Additional content has been added to acknowledge that some processes can be used for both EfW and recycling processes and that for the purpose of this section of the strategy, only the EfW processes are being referred to.

The rewritten section also acknowledges that where EfW is used to replace the use of fossil fuels there can be associated GHG emission reduction benefits.

The strategy is intentionally technology agnostic, focusing on the application of principles and outcomes sought.

Illegal dumping and litter

Submissions that addressed this area raised the significant impacts caused by illegal dumping, noting that this behaviour tends to occur more in regional areas and is affected by the cost and accessibility of disposal, as well as the type of products accepted at facilities. It was suggested that increased data availability (e.g. what is being dumped) could assist in determining strategies for community education.

A few submissions pointed out that effective and fully funded product stewardship schemes can contribute to a reduction in illegal dumping by providing accessible collection points and reducing the cost of disposal of items.

One submission suggested that items most prevalent in litter need to be specifically targeted for actions to remove them from the market, and another submission suggested there be a focus on cigarette butts.

Key change

- ✓ Adding contextual information reflecting how effective product stewardship schemes can help reduce illegal dumping

Disaster waste management

There was strong support for disaster waste management planning, with submissions identifying planning and preparation approaches that could improve outcomes.

Submissions noted that climate impacts and disaster type, frequency and intensity can vary between regions, and suggested zone level disaster waste management planning to identify local risks, map infrastructure capacity and gaps, clarify responsibilities, build community resilience, and enable faster, safer and more coordinated responses.

Other submissions suggested specific preparation activities, including climate resilience and adaptation planning, and an analysis of potential priority wastes by impact and scale under modelled likely impact scenarios of natural disasters of increased frequency and scale. One submission identified an opportunity for GISA to coordinate agreements between waste and resource recovery businesses to use each other's facilities, if facilities could not be used, for example due to fire.

Several submissions noted the impact on GISA in being the Functional Lead for disaster waste management, and how this impacts agency resourcing to deliver other programs.

Our response

Consideration will be given to the feedback provided when undertaking disaster waste management planning and preparation.

Concerns regarding the impacts of disaster waste management on GISA's resourcing and program delivery have been noted.

Key changes

- ✓ Adding zone level planning and community resilience to the action relating to planning for response to disaster and other disruptive events
- ✓ Adding information to include zone emergency management committees as key stakeholders and acknowledging the role of all stakeholder groups in disaster waste management preparedness

Other feedback raised

There were questions raised about whether the strategy is South Australia's overarching circular economy strategy or whether it is a waste strategy. It was recommended that to address the full range of circular economy opportunities there be a single South Australian circular economy policy/strategy.

Two submissions commented that mineral resources and the mining industry were not included in the strategy, noting that mineral resources are one of the 4 priority areas in *Australia's Circular Economy Framework* and a contributing factor for South Australia's circularity rate. A mining peak body noted that there are opportunities to support mining industry ambitions toward a circular economy that go beyond this strategy. This included a recommendation to include actions for waste reduction and resource recovery for the mining industry.

A range of submissions from local government, the waste and resource recovery industry, and recyclers commented on the solid waste levy. Two submissions called for a review of the levy, including consideration of the effectiveness and application of the levy, and specifically of levy hypothecation. Others requested that the strategy provide long term financial certainty relating to the levy. Local government in particular called for the strategy to determine and publish the levy amount for at least a three-year forward basis to provide councils with certainty and confidence for investment decisions. Some regional councils sought a greater proportion of the solid waste levy revenue to be dedicated to regional and remote infrastructure and services, noting that given the substantial differences in challenges and costs, applying the same funding to regional/remote areas that is applied to metropolitan areas is inadequate. Another submission noted that for certain forms of resource recovery, the resource recovery sector is often outcompeted by landfill depots on gate fee prices, and wanted to see levy settings, including rates and reinvestment into recovery infrastructure, that are conducive to incentivising the uptake of resource recovery services, rather than landfill.

Feedback was received that the strategy document could be split into two documents, the strategy and a priority action plan.

Several submissions encouraged the exploration of economic instruments to encourage more circular practices, including subsidies or tax breaks for circular products, and tax incentives to support repair.

There were suggestions across the whole strategy to use more committed language, with words like "act" or "progress" rather than "advocate" or "consider".

One submission wrote about the importance of regular monitoring and evaluation of South Australia's circular economy policies to maximise their efficacy, efficiency and effectiveness.

Our response

GISA is bound by the *Green Industries SA Act 2004* [the Act] to develop a 'waste strategy', and the Act sets out what the strategy is to include and what targets and goals are to be identified. The strategy includes an action to review the Act to update the objectives and functions of GISA to further support and enable a circular economy.

The strategy has not included an action to review the solid waste levy as the EPA is not undertaking a comprehensive legislative review of the waste levy at this time. However, the EPA and GISA continue to engage with regional councils and waste and resource recovery industry about the complex challenges of regional waste management and identify opportunities for improved application of policies and programs to support resource recovery outcomes. This includes application of the waste levy in regional areas, waste levy recycling deduction, and regional transport subsidies.

Various GISA led actions in the strategy aim to support waste management and resource recovery in regional areas. Funding for GISA's programs and projects comes from the waste levy that's collected by the EPA, of which 50% is paid into the Green Industries Fund.

The publishing of future solid waste levy rates is considered as part of annual state government budget discussions, therefore the strategy is unable to provide a forecast of these rates.

While some content has been reordered, the overall structure of the strategy document has not been significantly modified. It was considered that separating the list of actions from the strategy's vision, objectives, goals and targets, and contextual information into a separate Action Plan, would mean that the actions would be disconnected from this important supporting and guiding detail. However, consideration is being given to how to best support implementation of the strategy, which may include creating an additional Action plan or other guiding documents.

Many submissions provided detailed information relating to the implementation of actions listed in the strategy. This information is highly valuable and will be used to help inform implementation of the strategy.

There were also many valuable suggestions for what else could be included in the strategy, and while not all of these have been able to be actioned prior to the strategy's finalisation due to time and resource constraints, these ideas have been captured and can help inform GISA's ongoing programs and activities and the development of future strategies.

There is a limitation on what action can be taken at state level due to jurisdictional powers, with some reforms such as tax policy sitting with the Australian Government. The strategy includes actions in focus areas 1 and 5 to investigate and advocate for changes but cannot commit the Australian Government to action.

For actions that do sit within state government jurisdiction, the strategy uses "consider" language to not pre-empt legislative decisions, and to allow for more focused exploration and consultation on these actions by the responsible departments.

Key changes

- ✓ New section and action on mineral resources, recognising the importance of circular economy initiatives in this sector
- ✓ Changes to actions including wording and timeframes, reflecting progress and priorities of the EPA's review of the *Environment Protection [Waste to Resources] Policy 2010*.
- ✓ Updated contextual information and data where more recent information has since become available
- ✓ Adding information to the introduction on reporting against the strategy

Appendices

Appendix A - List of respondents

South Australian Government

- Consumer and Business Services
- Department for Education
- Department for Energy and Mining
- Department for Environment and Water
- Department for Housing and Urban Development (including State Planning Commission)
- Department for Infrastructure and Transport
- Department for State Development
- Department of Human Services
- Department of Primary Industries and Regions
- Department of the Premier and Cabinet
- Department of Treasury and Finance
- Environment Protection Authority
- Infrastructure SA
- Office for Design and Architecture SA
- Outback Communities Authority
- Renewal SA
- South Australian Country Fire Service
- South Australian Metropolitan Fire Service
- South Australian Skills Commission (including Industry Skills Councils)
- South Australian Tourism Commission
- TAFE SA

Local government

- Adelaide Hills Council
- Adelaide Hills Region Waste Management Authority
- Alexandrina Council
- Campbelltown City Council

- Central Adelaide Waste and Recycling Authority
- City of Adelaide
- City of Burnside
- City of Holdfast Bay
- City of Marion
- City of Norwood Payneham & St Peters
- City of Onkaparinga
- City of Port Lincoln
- City of Prospect
- City of Tea Tree Gully
- City of Unley
- City of West Torrens
- City of Whyalla
- Coorong District Council
- Copper Coast Council
- District Council of Elliston
- District Council of Grant
- District Council of Kimba
- EastWaste
- Eyre Peninsula Local Government Association
- Local Government Association of South Australia
- Lower Eyre Council
- Murraylands and Riverland Local Government Association
- Northern Adelaide Waste Management Authority
- Southern Region Waste Resource Authority
- The Rural City of Murray Bridge
- Town of Walkerville

Australian Government

- Commonwealth Scientific and Industrial Research Organisation
- Department of Climate Change, Energy, the Environment and Water
- Powering Skills Organisation

Regional Development Australia committees

- Regional Development Australia Limestone Coast
- Regional Development Australia Murraylands and Riverland

Organisations (including businesses)

- Adbri
- Adelaide Sustainable Building Network
- ANZ Biochar Industry Group
- APR Manufacturing Group
- Association for the Battery Recycling Industry
- Association of Mining and Exploration Companies
- Australia and New Zealand Recycling Platform
- Australian Academy of Technological Sciences and Engineering
- Australian Beverages Council
- Australian Council of Recycling
- Australian Fashion Council
- Australian Hotels Association SA
- Australian Industry Group
- Australian Marine Conservation Society
- Australian Packaging Covenant Organisation
- Australian Sustainable Built Environment Council
- Biobag World Australia Pty Ltd
- Charitable Reuse Australia
- Chartered Institute of Procurement & Supply
- Circular Australia
- Cleanaway
- Clothing Stewardship Australia
- Clubs SA
- DeCarbonate Energy Pty Ltd
- Dream Future Consulting
- EcoCycle
- Food and Beverage Australia Limited
- Food South Australia
- Genfac Plastics
- Green Building Council Australia
- Huhtamaki
- Innovyz Pty Ltd
- Integrated Waste Services
- Intellectual Capital Services Ltd
- IQ Energy
- KESAB environmental solutions
- LMS Energy
- Maccy Biochar / Black Diamond Biochar
- Marine Stores
- Materials and Embodied Carbon Leaders Alliance
- Metamorf
- Motor Trade Association
- National Retail Association and Australian Retailers Association
- No More Butts
- OzHarvest
- Peats Soils and Garden Supplies & Jeffries Group [joint submission]
- Polar Enviro
- Port Adelaide Environment Centre Waste Advisory Group
- Porta
- Primary Producers SA
- Product Stewardship Centre of Excellence
- Rawtec
- Re.Group
- ResourceCo

- Restaurant and Catering Association
- Reusably
- SA Fashion Industry Association
- SA Forest Products Association
- SA Independent Retailers
- SA Wine Industry Association
- SA ZERO [Committee for Adelaide]
- Seata
- Sims Metal
- Smart Energy Council
- South Australian Business Chamber
- South Australian Youth Forum
- Sustainable Communities SA
- Sustainable Population Australia
- Sustainable Solutions
- Tyre Stewardship Australia
- Waste and Recycling Industry Association SA
- Waste Management and Resource Recovery Association of Australia
- Wildfire Energy
- Wine Australia

Research and Education

- Centre for Social Impact - Flinders University
- Centre for Sustainable Infrastructure and Resource Management - University of South Australia
- Centre for Sustainable Materials Research and Technology - UNSW
- End Food Waste Australia
- Griffith University
- University of South Australia

Individuals

- Allan James
- Anonymous
- Anthony McIntyre
- Brittany Norris
- Cameron Wilson
- Chris Grant
- Chris Levi
- David Balfour
- David Donaldson
- Diane-Marie Campbell
- Gerald Carey
- Hannah Richards
- Jenny Paterson
- John Devlin
- Lionel Pengilley
- Margaret Scrase
- Mark Cramond
- Nick Pannell
- Paul Murphy
- Ritchie Hollands
- Vicki Tomlinson



**Government
of South Australia**

Green Industries SA