

Enquiries: David Bills
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Mr. Josh Wheeler
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Dear Mr. Wheeler,

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

The City of Adelaide (CoA) welcomes the opportunity to provide a submission to Green Industries SA (GISA) regarding *Accelerating SA's transition to a circular economy: South Australia's Waste Strategy 2025-2030* (SA's Waste Strategy).

The Council endorsed this submission at its meeting on 22 July 2025 based on Council policy and objectives contained in its [Strategic Plan 2024-2028](#), [Integrated Climate Strategy 2030: Resilient, Protected, Sustainable](#) (ICS), and [Economic Development Strategy- A thriving economy for all](#).

As part of an ambitious population growth target of 50,000 people living in the City of Adelaide by 2036, CoA is seeking to leverage and grow South Australia's green economy and green brand to prioritise economic outcomes through growth in circular economy businesses and jobs, and repurposing existing buildings for adaptive reuse.

The CoA acknowledges alignment between the strategic objectives contained in SA's Waste Strategy and the CoA's targets and strategies for economic development, adaptive reuse, waste reduction, resource recovery and a transition to a circular economy.

This submission is structured to respond to the questions raised in the GISA consultation survey, with key matters as follows:

City Growth

- CoA recognises that city environments and areas of medium and high density development may require alternative service delivery models and flexibility in the frequency of service collection to enable resource recovery.
- CoA supports proactive approaches including legislative reform, flexibility in frequency of waste collection for Council services, and precinct level solutions to enable more tailored organics collection services. Options can consider medium and higher density environments and lower-emission collection methods.
- The CoA is actively implementing a range of initiatives and interventions, some of which are supported by grant funding provided by GISA. The CoA is actively pursuing State Government support to amend waste management policies in the Planning and Design Code and seeks a strong focus by GISA on medium and higher density development in the implementation of SA's Waste Strategy.

The City of Adelaide acknowledges the Kaurna people as the Traditional Owners of the Country where the city of Adelaide is situated, and pays its respect to Elders past, present and emerging.

Circular Economic Development

- CoA supports meaningful ways to measure circularity and greater guidance for local governments to measure and contribute to State and National circular economy metrics.
- There is an opportunity to leverage Circular Adelaide, a portal connecting businesses with circular activities in the City of Adelaide with consumers, to other parts of Greater Adelaide and SA.

Systems Improvement

- CoA supports minimum standards being established for both customer reporting and anonymised reporting to the State Government and by local government area to increase the transparency of waste system performance and behavioural change programs.
- CoA supports wide-spread application of National Plastics Recycling Scheme to signal change to end-markets; and further on ground, multi-lingual engagement and education to support businesses to transition and align with changing regulations for single use and other problematic plastic products.
- There is an opportunity to standardise data tools to drive consistent and reliable reporting of targets and signal change to the market relating to performance expectations.
- CoA requests the development of guidelines and interim support for collection systems to support safe collection of batteries as well as e-waste as batteries are often embedded in these products.

Stewardship

- CoA supports a state-level textile stewardship legislative framework aligned with the objectives of the Federal Government to ensure a consistent national approach.
- CoA urges the transition from voluntary to mandatory product stewardship to drive further impact within the industry and reduce the downstream costs often borne by local governments through waste contracts.

Detailed responses, examples of the CoA's initiatives and further opportunities to accelerate the transition to a circular economy are Enclosed.

For further information please contact David Bills, Manager Low Carbon and Circular Economy on 08 8203 7889 or d.bills@cityofadelaide.com.au.

Yours sincerely

Michael Sedgman
Chief Executive Officer

Enc 1. City of Adelaide's response to *Accelerating SA's transition to a circular economy: South Australia's Waste Strategy 2025-2030*

Enclosure 1:

City of Adelaide's response to:

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

Survey question:

Do you have any comments on the strategy's objectives?

The City of Adelaide (CoA) acknowledges alignment between the strategic objectives contained in the draft SA Waste Strategy and CoA's targets and strategies for economic development, waste reduction, resource recovery and a transition to a circular economy.

This includes targets in the CoA's Strategic Plan 2024-2028, Integrated Climate Strategy 2030: Resilient, Protected, Sustainable (ICS), and Economic Development Strategy- A thriving economy for all.

The CoA is seeking to leverage and grow South Australia's green economy and green brand and has an ambitious population growth target of 50,000 people living in the City of Adelaide by 2036.

The CoA encourages the State Government to prioritise economic outcomes through growth in circular economy businesses and jobs, and repurposing existing buildings for adaptive reuse.

Survey question:

Do you have any comments on the strategy's goals and targets?

<i>SA's Waste Strategy's goals and targets</i>	CoA Response
<i>Overarching goal: Double SA's circularity rate by 2035</i>	The CoA supports meaningful ways to measure circularity and greater guidance for local governments to measure and contribute to State and National circular economy metrics. The CoA is establishing circularity metrics for reporting against its strategies, as follows: • Growth in circular economy industries in the CoA • Demand for resources and information • Services available and accessed supporting reuse and repair • Improvement of waste and resource recovery outcomes through the CoA service provision • Increase of circular procurement at the CoA
<i>Target 1: 10% reduction in material footprint by 2035</i>	The CoA supports meaningful ways to collect data that supports consistent measurement of SA waste targets. The CoA's Adaptive Reuse City Housing Initiative (ARCHI) reduces material footprint through the retention and activation of vacant and under-utilised building stock for housing. This program could have wider application across SA.
<i>Target 2: 30% increase in material productivity by 2035</i>	The CoA supports this target.

SA's Waste Strategy's goals and targets	CoA Response
<i>Target 4: Increase resource recovery and reduce contamination</i> <i>75% Municipal Solid Waste 70% Household bin system 10% reduction in total waste generated per person by 2030</i>	The CoA supports consistent targets for kerbside waste and supports alignment of local, state and national approaches. The CoA notes that the National Waste Policy Action Plan's Target 3 is 80% average resource recovery rate from all waste streams. The CoA values the continued investment by the State Government in delivering state-wide targets, for example GISA's grant funding and WhichBin programs. The CoA has established several strategic targets which are outlined in its Integrated Climate Strategy. They include: • Divert 80% of residential kerbside collected material from landfill • Residential kerbside collected recycling bins contain 10% or less contamination. • Food waste in landfill is below 5% by weight • Reduce waste generation by 15% per capita
<i>Target 5: 50% reduction in organics disposed to Municipal Solid Waste kerbside and Commercial and Industrial landfill bins by 2030</i>	Relating to green organics diversion, the CoA has established a strategic target which is outlined in the Integrated Climate Strategy that 'Food waste in landfill is below 5% by weight'.
<i>Target 6: Maximise material circularity</i>	The CoA supports meaningful ways to measure circularity and greater guidance for local governments to measure and contribute to State and National circular economy metrics. The CoA is establishing circularity metrics for reporting against its strategies, as follows: • Growth in circular economy industries in the CoA • Demand for resources and information • Services available and accessed supporting reuse and repair • Improvement of waste and resource recovery outcomes through the CoA service provision. • Increase of circular procurement at the CoA
<i>Target 7: Increase circular consumption activities</i>	The CoA supports growth in circularity and procurement aligned with its strategic priorities outlined in the Integrated Climate Strategy: • Priority 11: Growth in circular economy industries in the city • Priority 12: Procurement decisions that localise supply, prioritise reuse and drive green industries.

Survey question:

Are there any barriers to achieving the goals and targets?

Data availability

There is an opportunity to standardise data tools to drive consistent and reliable reporting of targets and signal change to the market relating to performance expectations. It would also enable transparency to the community who are contributors to the outcomes.

Data availability, data confidence and the ability to collect and synthesise data relating to waste management, resource recovery and the circular economy is complex.

The CoA has established the Performance on Waste and Resource Recovery (PWRR) data tool to report against its strategic kerbside waste targets. A second stage of this work is establishing circularity metrics for data collection and reporting.

Kerbside collection systems and frequency

The CoA recognises that city environments and areas of medium and high-density development may require alternative service delivery models and flexibility in the frequency of service collection to enable resource recovery and landfill diversion.

The CoA's residents have access to a standardised three-bin system (recycling, green organics, and waste). Only 20% of users have adopted the green organics collection service due to several factors including frequency of collection (prioritisation of waste collected weekly), general service awareness and lack of storage space available on property.

To address storage issues, with grant funding support from Green Industries SA, the CoA is trialing service level changes for residents in higher density laneways (small 80L bins and shared bins).

Survey question:

Focus area 1: Avoid waste

Do you have any comments on this focus area?

Focus area 1	CoA Response
<i>Figure 1</i>	Figure 1 is heavily focused on consumers. Consider further development of Figure 1 to include different target groups.
<i>Circular Design heading on page 28</i>	While national or State-based reform may be needed, incentives and interventions can be applied at a local level to set the strategic direction.
Actions to Avoid Waste <i>1.3 Collect data and conduct market research to help inform behavioural change activities that promote waste avoidance.</i>	Consider establishing reporting requirements to build the capacity and evidence base for behavioural change programs across SA.
Actions to Avoid Waste <i>1.8 Advocate for measures that overcome barriers to the repair economy, such as addressing the interplay between product warranties and product repair, and taxation policy relief measures.</i>	Include the 'ownership' of products which can impact on repairability.
Actions to Avoid Waste <i>1.9 Explore options to support the growth of the South Australian reuse and repair sector, for example through developing a directory and map of repair and reuse services.</i>	The CoA developed <u>Circular Adelaide</u> , a portal connecting businesses with circular activities in the CoA with consumers. This portal provides information on where to recycle, reuse products, or find cafes implementing circular practices. There is opportunity to leverage <u>Circular Adelaide</u> to other parts of Greater Adelaide and SA.
Actions to Avoid Waste <i>1.16 Advocate for the adoption of standardised waste reporting by waste collection contractors to customers that at a minimum includes:</i> <i>the classification of the material stream</i> <i>the weight of the waste or recyclables collected (if known)</i>	The CoA supports minimum standards being established for both customer reporting and anonymised reporting to the State Government and by local government area to increase the transparency of waste system performance and behavioural change programs.

Focus area 1	CoA Response
• <i>where each material stream will be taken (disposal facility) and the method of disposal/ processing. (such as recycling, landfill, energy recovery)</i> <i>This will simplify data collection and enable customers to make informed decisions.</i>	
<i>Actions to Avoid Waste</i> <i>1.17 Support the adoption of bin weighing systems for Commercial and Industrial collected waste and recyclables, to enable waste collection contractors to provide this data to customers.</i>	The CoA supports minimum standards being established for both customer reporting and anonymised reporting to the State Government and by local government area to increase the transparency of waste system performance and behavioural change programs.

Survey question:

Focus area 2: Reduce food waste

Do you have any comments on this focus area?

Focus area 2	CoA Response
<i>Actions to reduce food waste</i> <i>2.2 Expand messaging on food waste avoidance actions in households, including through enabling technology and tools to help households use up foods they already have.</i> <i>2.6 Support the rollout of area-wide, high-performing food waste collection systems, including within suitable multi-unit and higher density developments.</i>	The CoA recognises that city environments and areas of medium and high-density development may require alternative service delivery models and flexibility in the frequency of service collection to enable resource recovery. The CoA is actively pursuing State Government support to amend waste management policies in the Planning and Design Code. This will enable designed resource recovery outcomes for multi-unit dwellings.
<i>Actions to reduce food waste</i> <i>2.3 Develop resources to support and encourage businesses to take action to avoid and reduce food waste along the supply chain.</i> <i>2.7 Provide resources to support precincts to procure segregated organics collections from businesses within significant food retail areas.</i>	The CoA supports proactive approaches including legislative reform, flexibility in frequency of waste collection for Council services, and precinct level solutions to enable more tailored organics collection services. Options can consider medium and higher density environments and lower-emission collection methods.

Survey question:

Focus area 3: Reduce material loss and preserve value

Do you have any comments on this focus area?

The CoA's seeks a reduction in food waste and increased diversion from landfill. Food donation aligns well with these objectives and the CoA supports food waste generating businesses being required to donate unsold edible food to food rescue charities or recipient agencies.

Focus area 3	CoA Response
<i>Under Municipal solid waste – page 3</i>	Consider adding 'other public places where people gather' before 'large regional centres' to support consistency in messaging for public place resource recovery systems.
<i>Actions to reduce material loss and preserve value</i> <i>3.2 To increase the recovery of organics, food waste, and recyclables in household kerbside bins, consider legislative reform to support staged implementation of 3-bin kerbside collection systems for households, aligned with the SA Better Practice Guide: Sustainable Kerbside Services, initially for metropolitan Adelaide then consider extending to large regional centres and townships where current or planned local processing capacity exists.</i> <i>3.7 Work with councils to:</i> <i>• implement the SA Better Practice Guide: Sustainable Kerbside Services</i> <i>• apply best practice segregated 3-bin waste management systems for medium and high density dwellings and be the preferred service provider for all residential dwellings, if the building can meet the service parameters as defined by each council.</i>	To support a diversity of premises, consider including alternative methods for the provision of service. For example, the CoA is trialing two different services provisions for high density residential city laneways with limited storage spaces for waste collection. Trial 1: Green organic 'mini bins' which are serviced weekly have been deployed to residents in 5 laneways to increase service adoption and food organics recovery. The residents have received engagement and education to support recovery and the outcomes are currently being monitored. Trial 2: A 3-stream shared bin system (including green organics) with a surround to support amenity was designed, fabricated, and installed and is now operationalised in a laneway. Residents in the laneway share the use of these bins in place of standard individual MGBs. The shared bins are serviced weekly rather than at the standard collection frequency for MGBs. The residents have received engagement and education to support recovery and the outcomes are currently being monitored. The CoA welcomes ongoing collaboration with GISA and other key stakeholders to support the CoA's proposal for a waste code amendment to amend State Government planning policies and enable design-led resource recovery outcomes for multi-unit dwellings.

Focus area 3	CoA Response
<i>Actions to reduce material loss and preserve value</i> <i>3.10 Adopt Australian Standard AS 4123.5-2008 Mobile waste containers for all new and replacement kerbside mobile waste containers.</i>	Consider legislating the Australian Standard AS 4123.5-2008 to standardise receptacle colours supporting consistency in messaging across all user areas (e.g. including businesses).

Survey question:

Focus area 4: Address emerging and problematic wastes

Do you have any comments on this focus area?

Focus area 4	CoA Response
<i>Actions to address emerging and problematic wastes</i> <i>4.1 Advocate for and support national solutions to problematic wastes, or consider state-based solutions if required, including product stewardship approaches that restrict hazardous materials, address end-of-life and eliminate problematic waste.</i>	The CoA supports advocacy efforts at the national level for problematic wastes.
<i>Actions to address emerging and problematic wastes</i> <i>4.3 Continue to phase out single-use and other problematic and unnecessary plastic products in South Australia and consider other measures to address plastic use.</i>	The CoA has been actively participating in the National Plastics Recycling Scheme (NPRS) soft plastics kerbside collection pilots since December 2022. The outcomes of these pilots and developing stewardship program indicate that this is an effective mechanism to recover problematic plastic products. Materials such as soft plastics are easily recoverable and recyclable if the industries and end markets are in place. The CoA supports wide-spread application of a National Plastics Recycling Scheme to signal change to end-markets. Further refinement of the definition of waste to clarify materials with established processes for recovery could enable better recovery. The CoA supports further on ground, multi-lingual engagement and education to support businesses transition and align with changing regulations for single use and other problematic plastic products.
<i>Actions to address emerging and problematic wastes</i> <i>4.9 Until a product stewardship scheme is in place, as an interim measure, establish a safe and effective collection system for Li-ion batteries supported by a public awareness raising campaign.</i>	The CoA has established <u>Reuse and Recycle Hubs</u> to support the community in diverting valuable resources and reducing risk with collection from waste vehicles. Batteries, soft plastics and blister packs are of immediate concern to CoA. Council-led collection services are offered to our community for batteries and blister packs as these items as they are prevalent, have systems in place to recover, yet remain problematic.

Focus area 4	CoA Response
<i>4.10 Educate and raise community awareness of responsible and safe management of end-of-life batteries.</i>	Concerns about the safety of community battery collection points have been discussed with the MFS however further guidance is required. The CoA requests the development of guidelines and interim support for collection systems to support safe collection of batteries as well as e-waste as batteries are often embedded in these products.
<i>Actions to address emerging and problematic wastes</i> <i>4.16 Support textile stewardship schemes, such as Clothing Stewardship Australia's Seamless, through policy, programs and infrastructure investment in circular systems for textiles</i>	The CoA supported GISA in the Give a Sheet Day, to recycle bed linen and textiles. Collection days for the community are helpful in diverting resources. Local governments can host drop-off points and support education efforts with adequate funding support and clear safety protocols. Public awareness campaigns should be co-designed with local government to support and reinforce consistent messaging. The CoA recognises the impacts of fast fashion and seeks innovation in the textile/fashion industries leading to high quality resources remaining in circulation through its Integrated Climate Strategy and Economic Development Strategy. Product stewardship is consistent with these aims and Councils priority for zero avoidable waste to landfill. A state level textile stewardship legislative framework could enable innovation, increase adoption/reduce waste generation and demonstrate leadership, provided it also supports Federal frameworks to support consistency in systems. Any product stewardship legislative framework should align with objectives of the Federal Government to ensure a consistent national approach. A state level stewardship legislative framework could: • require all manufacturers to take responsibility for the environmental impact of their products, including disposal and recycling. • encourage manufacturers to design products that are easier to recycle and more durable, supporting a circular economy and reducing the need for virgin materials. • facilitate systems development for proper collection and recycling, particularly for hazardous items and or difficult items like electronics, batteries, mattresses and plastics.

Focus area 4	CoA Response
	Benefits of introducing a state level stewardship legislative framework include: • reducing waste generation, illegal dumping, pollution. • promoting resource recovery. • ensuring hazardous waste is handled properly, reducing the risk of harmful substances entering the environment and improving public health. • creation of economic opportunities and jobs in waste management, recycling, and repair industries positioning South Australia as a leader in environmental responsibility and resource conservation The CoA urges the transition from voluntary to mandatory product stewardship to drive further impact within the industry and reduce the downstream costs often born by local governments through waste contracts.

Survey question:

Focus area 5: Develop and support circular markets and businesses

Do you have any comments on this focus area?

Focus area 5	CoA Response
<i>Procurement & Increasing use of recycled content</i> <i>Regardless of the organisation seeking to implement sustainable procurement, support will be needed for procurement officers. This includes specific training, procurement resources such as sample evaluation questions and contract clauses, and ongoing support.</i>	<i>Traceability</i> as identified in this section is important as is the collection of data to measure transition to circular materials. The CoA is amending its engineering drawings to enable the purchase of novel materials supporting circular economy through procurement. Supporting methodologies, baselines and reporting requirements could assist with the transition to circular practices. To ensure reliability and accountability, consistent and mandatory Environmental Product Declarations (EPDs) and Product Carbon Footprints (PCFs) / Climate Declarations would facilitate the comparison of different materials and improve understanding of their environmental impacts. The CoA supports ongoing advocacy for consistent Environmental Product Declarations (EPDs) and Product Carbon Footprints (PCFs) / Climate Declarations.

Survey question:

Focus area 6: Build a circular built environment

Do you have any comments on this focus area?

The CoA recognises the potential to transform the built environment using circular economy as demonstrated through the Adaptive Reuse City Housing Initiative (ARCHI), which aims to create new homes in underused buildings in the City of Adelaide. By repurposing existing structures, the CoA is seeking to diversify housing options, unlock revenue potential, improve building performance and revitalise Adelaide's streetscapes. Building categories now include:

- Shop-tops: Buildings up to four storeys in height.
- Commercial to residential: Buildings five storeys and above.
- Heritage: Adaptive reuse of heritage listed buildings to residential.
- Major Projects: Projects delivering 20+ dwellings.

The CoA supports the proposed actions in Focus Area 6, acknowledging the importance of retention and reuse first. Government pilot programs are leading the way and establishing benchmarks for circular economy outcomes.

Relating to resource recovery in multi-unit dwellings developments: Efficacy of a three-bin system is contingent on the systems which support it. For example, purpose-designed waste rooms that prioritise green organics diversion, and are accessible by contractors, reduce contamination and increase diversion.

To ensure the success of the three-bin (or alternative multi-stream) waste systems, planning codes should require that building designs incorporate dedicated space for all waste streams. If chutes are to be used, the installation of separate chute systems with handles (one for each waste stream) should be mandatory, or alternatively, waste rooms must be large enough to accommodate the necessary bins for all waste types.

Many apartment buildings are mixed-use with commercial properties (often at ground floor) and residents occupying the building. Mandating a multi-stream waste service for all occupants will result in better diversion outcomes and may enable shared bin rooms.

Survey question:

Focus area 7: Develop circular economy knowledge and skills

Do you have any comments on this focus area?

Focus area 7	CoA Response
<i>Actions to develop circular economy knowledge and skills</i> <i>7.2 Deliver information to council-serviced premises on reducing waste and the correct use of kerbside recycling and organics bins, as well as other collection systems</i> <i>7.3 Develop and deliver community education and awareness programs to encourage reuse and repair to support the growth of the South Australian reuse and repair sector.</i> <i>7.4 Advocate for national product labelling standards and systems that retain information throughout the product life cycle (such as product traceability) and disclose materials used, including but not limited to, recycled content, and information to enable repair, reuse, disassembly and recycling of products.</i>	Ongoing messaging and education such as the Which Bin campaign and Plastic Free SA have been effective methods to communicate resource recovery approaches. Consistency in 'home, work, and play', labelling standards and extending the Green Industries SA Which Bin Campaign to businesses would support consistent education and messaging. The CoA's experience in working with small businesses is that educational and financial support will increase circular economy outcomes.

Survey question:

Focus area 8: Measure SA's transition to a circular economy

Do you have any comments on this focus area?

The CoA supports the actions listed within Focus Area 8 and welcomes collaboration on outcomes.

The CoA supports meaningful ways to measure circularity and greater guidance for local governments to measure and contribute to State and National circular economy metrics. There is an opportunity to standardise data tools to drive consistent and reliable reporting of targets and signal change to the market relating to performance expectations.

The CoA has established the Performance on Waste and Resource Recovery (PWRR) data tool to report against its strategic kerbside waste targets. A second stage of this work is establishing circularity metrics for data collection and reporting. Such approaches drive transparency and accountability.

Survey question:

Focus area 9: Contribute to net zero emissions

Do you have any comments on this focus area?

The CoA is committed to reducing carbon emissions and keeping materials in circulation for longer. CoA welcomes *Action 9.3 'Encourage the development of embodied carbon metrics for the built environment to measure progress towards circularity and decarbonisation.'*

The CoA has identified that consistent and mandatory Environmental Product Declarations (EPDs) would support circularity and decarbonisation by enabling more informed decisions about the environmental outcomes of procurement choices, particularly in the built environment, which carries significant greenhouse gas impacts.

Survey question:

Other areas - Illegal dumping and litter

CoA supports *Action 11.3 'Provide community education to support the reduction of litter'* and suggest this is delivered in collaboration with Councils.