



The Hon Susan Close MP Minister for Climate,
Environment and Water
GPO Box 11071
Adelaide SA 5001

Email: OfficeOfTheDeputyPremier@sa.gov.au

6 March 2024

Dear Minister

Re: South Australia's Kerbside Collection Rules

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. WMRR's members are involved in the breadth and depth of waste management and resource recovery, engaging in significant activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residuals and problematic wastes.

In SA, waste and resource recovery (WARR) activities directly and indirectly employ around 5,000 people as well as leading the nation in its level of resource recovery. Our members are deeply committed to further enhancing the strength of the industry and the outcomes it achieves as we strive towards increasing circularity and reducing emissions. On 21 February 2024, WMRR notes that the SA Government announced that updates are proposed to be made to kerbside collection rules, including that councils will be prohibited from charging kerbside collection fees based on weight or additional fees for weekly general waste collection.

WMRR is very keen to meet with you at your earliest convenience, to discuss the potential implications that this proposal will have on industry's ability to meet state and national resource recovery and carbon targets.

WMRR acknowledges that the Government is clearly committed to ensuring that households receive affordable, effective and convenient waste management services without additional costs. WMRR holds concerns however that in their current form, the proposed rules may have the opposite effect to that intended, increasing waste management cost pressures and seeing the less well-off continuing to subsidise the activities of the more profligate.

WMRR supports the Government in its cost containment ambitions, as we are also acutely aware of the cost of living pressures that exist in the community. We strongly believe that there is real benefit in working collaboratively to reduce the amount of waste created. This could be done effectively and assist with cost of living concerns by focusing on consumption and prolonging the life of products. As you are aware moving to a circular economy in SA is key to achieving our resource, biodiversity and carbon goals, making it vital for us all to work together to buy less and make it last longer.

WMRR believes that the government's goals can be achieved alongside furthering goals to reduce the amount of household waste that goes to landfill with some refinements to the proposed Bill's scope. Of particular importance, is protecting the feasibility and flexibility of FOGO collection services, which as well as the need to

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037
(02) 8746 5000
INFO@WMRR.ASN.AU



divert we need to work to reduce creation at first instance- which is far better for both cost of living and methane mitigation. WMRR welcomes the fact that EPA will lead consultation on the draft Bill. However, we are very keen to meet with you prior to draft finalization to discuss these important matters to ensure that the broader system objectives are not adversely impacted by the current proposal.

We look forward to meeting to explore any opportunities for Bill scope refinement at your convenience. Please do not hesitate to contact WMRR's CEO Gayle Sloan at Gayle@wmrr.asn.au or 0429 076 713 to arrange a time that suits.

Yours sincerely

Gayle Sloan
Chief Executive Officer

Tiana Nairn
SA Branch President