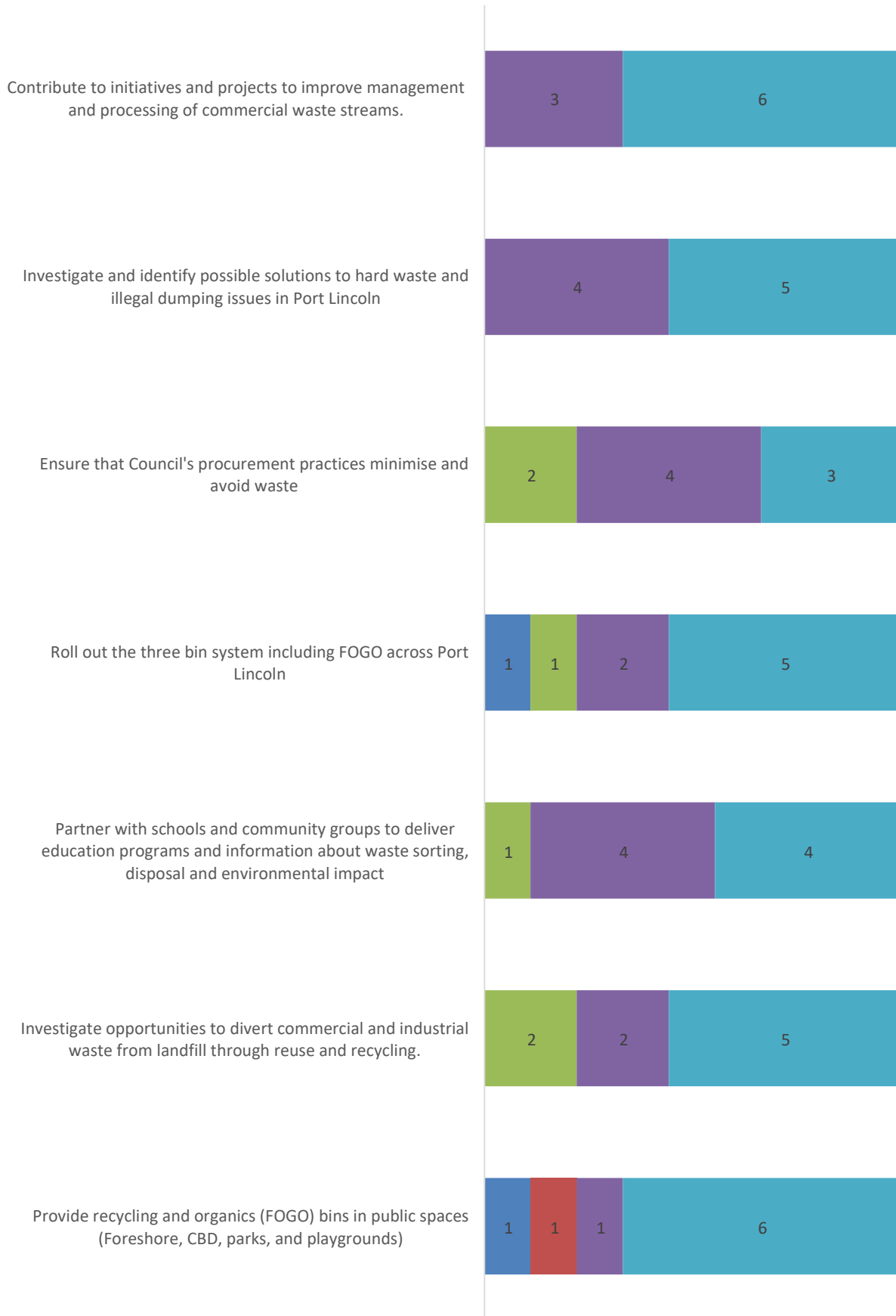


Waste and Resources Management Strategy

■ Not at all important
 ■ Less Important
 ■ Neutral
 ■ Important
 ■ Very important



Draft Waste and Resource Management Strategy: Additional Feedback from Survey Respondents

Theme	Verbatim Comments
Hard waste Solutions	I like the idea of hard waste vouchers to allow residents to dispose of large / toxic items once or twice a year.
Reuse and recycling	I would encourage strongly any efforts to create a "tip shop" to recycle reusable items and perhaps create an income stream for council or a charity (e.g., Bedford Industries?), especially as EP Recycling Specialists no longer sell recycled metal objects to the public and there is no commercial outlet for other items e.g., wood.
Reuse and recycling	Any other recycling initiatives e.g., plastic recycling should also be encouraged. There was at one stage a proposal for Port Lincoln Prison to mill plastic items for recycling beads - could that be looked into again?
FOGO rollout	Yes, to FOGO for the rest of the council area please, and composting workshops and sales.
Industrial Waste Quantification	Why was fishing and aquaculture waste singled out in the survey and not other commercial waste sources. Especially where no quantification or context is provided on industrial waste within the strategy?
FOGO roll out	P10 How can a target to implement kerbside 3 bin systems be set prior to the outcomes of the pilot study? What are the indicators for the success of the trial?
Product Stewardship and Advocacy	P12 What is "product stewardship" and what does supporting it's development mean? How will the PLCC undertake 'advocacy'? Reporting target should be included on following page, monitoring and reporting.
Education	As stated within report: education is fundamental, where kids (all ages) take waste reduction & proper bin selection lessons home to (traditionally) uninterested parents.
FOGO roll out - increase size of red bin	I'm all for the FOGO roll out for the entire city. But being part of the pilot program, we feel the red lid bins need to be upgraded to the next size up bin if it is to remain as a every 2 week pick up.
Reuse and recycling	if commercial waste such as soil, bricks, concrete was recycled and sold to the public, it would provide a income stream for the recycling of those materials and would be cost effective.
Local circular economy initiatives	Section 4 commits to improving management and processing of waste streams. The actions seem disconnected from this description, and no resourcing is allocated that will make a difference. The Council has a very real opportunity to make a difference in this area and could look at localised initiatives like the Bega Valley Circularity project and related partners, and support fishing, aquaculture and others to drive a successful circular economy that adds value to the industries and reduces costs to the council.
FOGO roll out	Green waste rubbish collection is a great idea however not suitable for many families i.e., those with young children/ disabilities who need their waste collected weekly. Could be an initiative for those who elect to have green waste bin to take to dump free of charge rather than take weekly collection of general waste off those we need it.
Illegal dumping	Is there any data available as to the cost of clean-up activities that are regularly needed e.g., community manhours spent on beach clean ups, hard waste dumped clean ups etc. It is great that illegal dumping is targeted in the plan, and this would be further supported by any data available (if it exists) on this.
Illegal dumping	Partnering / support of community groups and schools to implement clean-ups and surveys may be something important to add to the plan. Community groups are often instrumental in conducting big clean up in reserves etc. and could be supported even through simple things like the provision of suitable vehicles for waste haulage, are free disposal of waste collected at the dumps.

Is there anything missing from Councils draft strategy that you would like to see included?

Theme	Suggestion	Proposed Response
FOGO	Is there any way of incentivising people to have fortnightly rubbish collection options?	Incentives may be considered in the implementation of objective 1. Reduce waste generation and increase landfill diversion.
Monitoring & Reporting	Timeframes need to be included for communications.	Communication target included in monitoring and reporting section
Resourcing	No explanation is given on investment and resourcing. Residents and industry need to understand how resourcing will be achieved before they can decide if they support the strategy.	The Strategy assumes that costs will reduce or remain neutral as less waste will be taken to landfill.
Product Stewardship & Advocacy	Need to outline within document what a product stewardship program is. How will the CEO advocate at the Federal Level, and why no state advocacy?	Definition of product stewardship included in Strategy.
Communication	Need an objective for communication outcomes	Communication target included in monitoring and reporting section
Concern re. current Resource Recovery Centre site	Please do have a look at the photo within of the current waste facility location? It is a PRIME residential location. Update PLCC industrial site locations drastically ASAP. It is long outdated, inconsiderate of (residential & nature) environments, failing health & safety requirements.	Relocation of the Resource Recovery Centre (RRC) is not a current strategic priority of Council. Operations of the RRC are subject to an Environment Protection Authority (EPA) licence and a Landfill Environmental Management Plan.
FOGO - Frequency of red bin collection	If there is no reduction on property rates if the red bins get picked up less, then I propose free entry ticket to use the council tip per quarter. You could even have a council pick-up from the kerb per year. This will definitely help people like myself, who are disabled and can't drive. It will also help the aging population that do not own a vehicle who will not use their ticket entry to the tip.	Hard waste issues and options will be considered in Priority Action - Identify and assess potential solutions including hard rubbish collection, vouchers for free hard waste and green drop off
Annual free 'dumping' day	Be good for a free dump day 1 per year would help with on road dumping.	As above

Written Submission

Suggestion	Response
Suggest providing a plain text version without the fancy graphics.	Plain text version to also be provided
Suggest Council avoids term 'landfill'	No change proposed
<p>Amend key principles:</p> <p>3. Deliver reliable, flexible, cost-effective, and contemporary waste management services <i>that satisfy the expectations and needs of the community.</i></p> <p>5. Implement and uphold governance (delete structures) that complies with the law and state government objectives, establish arrangements that support collaboration and partnerships, and seek innovative solutions</p>	No change proposed as these are the objectives in the EPLGA Waste and Resources Management Strategy.
<p>Current Waste Services Commentary about the performance of waste services contractor.</p>	<p>It is not appropriate to include commentary about the performance of the waste service contractor in the Strategy.</p> <p>Actions under Objective 3. Deliver Reliable, Flexible, and Cost-effective Services will improve data collection and reporting.</p>
<p>Query about total waste figure and diversion rate</p>	<p>The diversion rate referred to is derived from the amounts reported in the FY 2023/24 table. The total waste figure is 15,107 and includes all waste i.e., both kerbside collection and waste delivered to the Resource Recovery Centre.</p>
<p>There is no information on the large diversion of wastes for recycling that occur through;</p> <ul style="list-style-type: none"> • EP Recycling Specialists • Port Lincoln Metal Recyclers • Rick Daniels Recycling Centre • Business diversions • Private property diversions 	<p>We do not have data on private recycling. Data included in the 23/24 table (p.6) includes commercial waste (3,630 tonnes) and general waste brought in by public (estimated 2,555 tonnes). Action 3 under Objective 3. Deliver Reliable, Flexible, and Cost-effective Services aims to:</p> <p style="padding-left: 40px;">Improve data collection about the composition of waste streams</p>

Opportunities	Response
<p>Kerbside Collection</p> <p>“Improve kerbside collection performance” The statement “The City of Port Lincoln is one of the only ...” does not make sense. Either the CoPL is “the only” or it is “one South Australian regional city ...”. Please correct</p>	Amended
<p>Bin sizes</p> <p>Smaller bins could be trialled. If FOGO is to be retained, then the opportunity could be explored for an 80/80/80 litres bin combination.</p>	Bin sizes will be considered along with collection frequency as part of the FOGO pilot evaluation and FOGO roll out.
<p>Kerbside Collection opt out option.</p>	Service charges are applied in line with Section 155 (2(a)) of the Local Government Act. The service is provided at a property and the service charge can not be removed.
<p>Neighbourhood Organic Waste Bins</p> <p>Deployment of neighbourhood household organic waste bins where one large bin serves a number of properties. This could be introduced as a trial for proof of concept.</p>	Not currently being considered for individual allotments. Communal bins may be considered for multi-unit dwellings e.g., apartments.
<p>Residential Care settings</p> <p>The Draft Strategy could be improved with specific actions in other residential settings (e.g., elderly flats and units, residential aged care) that have higher occupation densities but with low waste recovery/conversion systems. Such strategies could significantly reduce the organic waste volume, thereby resulting in collection efficiency.</p>	Out of scope for Strategy.
ACTION PLAN	Response
<p>Kerbside FOGO collection - Household composting</p> <p>Support for composting and vermi systems (worm farms) on their properties. Reliance just on the FOGO program will be at risk of limiting self-action or compromising other methods. I consider the household scale system could operate conjunctively with the FOGO service.</p>	<p>Agree that household composting / worm farms and FOGO complementary.</p> <p>The roll out of the FOGO pilot included a workshop about composting and current pilot includes a subsidy for compost bin.</p>
<p>Organic Waste Generation</p>	See Opportunities section: 59% of waste in red lid bins is compostable, i.e., of the 4050.65 tonnes of kerbside waste collected 2,390 tonnes of this is organic. This is one of the key drivers of FOGO collection.
<p>Community wide information</p> <p>Draft Strategy could contain an Appendix that lists existing sites/businesses that receive waste materials. The list at Council’s website is not complete.</p>	Proposed to update website rather than include in Strategy as this is easier to keep current.

<p>Soft Plastics a “watching brief on soft plastics recycling initiatives” (Objective 2 in the Action Plan) is a plan of no action. A cautious approach is no solution to solving the ever increasing scourge of the soft plastics problem. Rather than wait for others to find a solution that Council can follow, take the lead right now</p>	<p>The action has been amended to include and <i>explore opportunities for soft plastics processing /reuse.</i></p>
<p>Other Suggestions</p>	<p>Response</p>
<p>Establish community and regional connections. For example, a community waste and resources group would be an invaluable resource to further the aims of the Strategy and to assist with its delivery.</p>	<p>Council is committed to work across the region, including participation in EPLGA standing committee and other governance structures.</p>
<p>Commercial Composting The Draft Strategy should describe where organic material collected through FOGO will be deposited and composted. A business opportunity exists for a composting facility</p>	<p>Agreed - Refer Priority Action 2.1: Develop a business case for FOGO roll-out including composting facility.</p>
<p>Commercial and Industrial waste Commercial properties and businesses produce substantial packaging waste, but it has not been emphasised in the Draft Strategy. Again, it is critical to know the types and quantities of wastes from industry and businesses, and how they are handled Builders’ waste is not specifically mentioned in the Draft Strategy</p>	<p>Refer Priority Action 2.3 which includes construction and demolition waste. This objective and associated actions aim to better understand the composition of waste streams and improve available data.</p>
<p>Establish a dump (or tip) shop.</p>	<p>Objective 3 – Action 2. Potential solutions for hard waste and illegal dumping</p>
<p>Education Education is perhaps the most critical long-term strategy of all, because behavioural change is clearly necessary across all sectors of business and the community. Part of education is mentioned in Objective 2, but it deserves to be allocated as Objective 6 and to be undertaken by the proposed “Waste and Resources Officer” position. Given the essential role that education and information can play, I suggest the allocation of just \$2000 in Objective 2 of the Draft Strategy is insufficient by at least a factor of five.</p>	<p>The objectives directly link to the EPLGA Strategy and is not proposed to include a new objective. Council can increase the community education budget through the annual budget review process once the program established.</p>

CITY OF PORT LINCOLN

DRAFT WASTE AND RESOURCES MANAGEMENT STRATEGY 2025-2029

COMMENTS

by [REDACTED] (Civil/Environmental Engineer)

[REDACTED] [REDACTED], Port Lincoln SA 5606
[REDACTED] [REDACTED]

24 September 2024

Introduction

The comments in this document are based on my experiences over many years in waste management, firstly as a local government engineer in SA and Victoria, and secondly as a consultant to local government. A number of years ago I was involved in the preparation of 'landfill' closure plans and site remediation at many sites across rural SA, including at a number of locations on Eyre Peninsula. I have also undertaken a waste audit for a Victorian municipality.

Today on our residential property, I am undertaking waste minimisation and resources recovery and conversion, including conducting public education through the Eyre Bioregional Permaculture Group. This is a voluntary effort and my civic responsibility.

Since moving to Port Lincoln more than six years ago, our household has produced very little waste and in the past two years, I have implemented a simple system that has now resulted in zero waste material being deposited to both the waste bin and the recycling bin. Organic wastes are all retained on the property and converted by composting and worm systems. Our property sends NO material for kerbside collection, as it is all dealt with on site or through existing collection outlets.

The penalty imposed on us for our actions is akin to a fine of \$379. I have addressed this matter later.

The comments in this document are meant for constructive improvements of the proposed strategy. For those in the general community who wish to print the Strategy document, I suggest providing a plain text version without the fancy graphics. It will save ink. I also suggest this be adopted for other Council strategy documents and reports that are publicly available.

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I avoid use of the term "landfill" and I suggest Council does likewise; break away from this language norm. The term conjures a feeling of land reclamation and doing good, when it is actually the opposite that occurs. It is pollution. "Landfill" is nothing more than a containment of human detritus, so say it for what it is. Dump.

When we think that rubbish is tipped into holes in the ground - holes that are excavated by humans with machinery that result in a large unaccountable carbon emissions legacy - or placed on the ground and covered with material that arises from excavations, then the term "landfill" loses its glamour. Humans have an ability to conceal problems with glamorous terms. Change the language! Change the human subconscious!

Dump ... now that's hardly a term that would not strike a chord of avoidance. It was once commonly used.

A. **Key principles (pg. 2)**

These are all fine, but it seems there is a disjunction with the fact, and to this I refer to “current best practice”. I suggest the following additional clauses for clarity and comprehensiveness.

3. *Deliver reliable, flexible, cost-effective, and contemporary waste management services that satisfy the expectations and needs of the community.*

5. *Implement and uphold governance (delete structures) that complies with the law and state government objectives, establish arrangements that support collaboration and partnerships, and seek innovative solutions.*

B. **Outsourcing (pg. 4)**

Council is now more than half way through the current 10 year period for waste management services provided by Veolia. The 2022/2023 cost was \$3,126,245.

Answers to some questions would paint a more comprehensive picture.

- How has this figure (back-indexed) compared with pre-contract years (i.e. 2018)?
- How have recycling and resources recovery compared since the commencement of the contract? I note there was an audit in 2017.
- What responsibility does the contractor have in waste minimisation? Veolia stands to make more money if it handles more rubbish, so there is a contractual issue that most likely should be examined.
- What is the income derived by Veolia from sale of kerbside recyclable collections? Where is the income directed? Is the community deriving a benefit?
- Veolia also handles 7,000 tonnes of other recyclable material, for which a charge is made accordingly. Aside from the intractable wastes, how much of this 7,000 tonnes can be retained and converted locally?
- How much is transported out of the locality? How far does it go? What are the costs?
- Veolia is in business to make money, but is it required under its contract to provide periodic reports?
- What is the opportunity cost to the community by not claiming a stake in the value-adding potential?

C. **Diversion rate (pg. 5)**

All the figures in the 2023/2024 FY table are for kerbside material that passes through the Resources Recovery Centre, and can be misconstrued.

There is no information on the large diversion of wastes for recycling that occur through;

- EP Recycling Specialists
- Port Lincoln Metal Recyclers
- Rick Daniels Recycling Centre
- Business diversions
- Private property diversions

In addition, 7000 tonnes of material delivered from other sources (pg. 4) is a significant proportion of the total figure. Is the total waste figure $15,107 + 7,000 = 22,107$ tonnes pa?

Thus, the "19% diversion rate" is considered to be misleading and does not accurately represent the "whole community" figure.

From the figures shown, the total waste generated **per residence** is nearly 2 tonnes per year ($15,107 \div 8,300$). How does this compare with state and national averages?

The SoE 2023 report (to which the Draft Strategy has referenced) says that SA “produces the most waste

per capita of all national jurisdictions". It is 2.68 tonnes per capita¹.

An accurate **per capita** waste material rate for Port Lincoln would be useful to know for comparison purposes, and this would include **all** wastes.

Example - if total wastes are 15,107 + 7,000 = 22,107 tonnes pa, and average number of people per household is 2.5, then the per capita waste material rate throughout the RRC is 1.06 tonnes.

Include other wastes from all other sources as listed above and the picture is much different.

Thus, in terms of a total waste strategy, it is important to know what the actual figures are.

D. Opportunities (pg. 6)

Further opportunities are outlined below in addition to the two that are described.

(1) "Improve kerbside collection performance"

The statement "The City of Port Lincoln is **one of the only** ..." does not make sense. Either the CoPL is "the only" or it is "one South Australian regional city ...". Please correct.

FOGO seems to be the only strategy in this sub-section but how does it improve kerbside collection performance? In my view, the FOGO program belongs in another area of the Strategy.

Let's go back to the statement at pg. 1 about "community empowerment and education" and the aim to **divert** waste from dumps and "recover for beneficial use".

If waste services represent 16% of Council's total annual expenditure, then every avenue should be explored to reduce this cost. Accordingly, the Draft Strategy would benefit by including additional scope and more information about all costs associated with the waste stream.

(2) If every tonne of dumped material costs Port Lincoln residents and businesses (via Council) \$285, then what is the breakdown? The dumping levy rate is presently \$80.50 per tonne², therefore the remaining cost is \$204.50, which presumably is a combination of - handling, transportation, and disposal. The community should be informed of this, because it might just be the provocation for action. Costs matter.

The opportunity to reduce this figure by half would be very significant, and of course it is expected there would be effects on the contract with Veolia. But the community does not know about the contractual arrangements, and therefore in the interests of transparency I suggest they be suitably described.

Special note

Together with EPLGA and LGASA, Council is suggested to seek and secure at least 80% return of the collected waste levy from the state government to enable progression of the circular economy that is being strived for. The waste levy paid by Port Lincoln residents should NOT be used for beach sand replacement along Adelaide's beaches as has happened in the past³.

¹ Source : <https://soe.epa.sa.gov.au/environmental-themes/liveability/waste>

² Source : https://www.epa.sa.gov.au/business_and_industry/waste-levy

³ Source : <https://www.indaily.com.au/news/2019/07/10/shifting-sands-why-sa-pays-for-an-endless-cycle-of-beach-replenishment>

- (3) Bin sizes. My time in local government in the 1980s was the period of transition in Australia to mobile garbage bins (MGBs) or wheelie bins. 240 litres capacity became the 'standard'. Few know why, but the inevitable happened - people were tossing away so much stuff just to fill that 240 litres bin! Then a 140 litres capacity MGB came into existence, principally to encourage less waste. It's still too big. I recall 60 litres metal and plastic bins once being the 'standard', but that was a long time ago when per capita consumption was much less.

At Port Lincoln, 140 litres weekly collection + 240 litres recycling fortnightly collection is **equivalent to 260 litres each week**, a huge potential volume of waste. How can any household produce such a volume of waste every week? It is nonsense.

It is the human condition that ensures the space in the bins is consumed with materials that are dumped by those who don't care. What can be done about limiting this impact? This is the challenge and the opportunity that has not been addressed in the Draft Strategy.

A glaring deficiency in the waste collection system is that it is totally geared for large bins. I think this is a mistake.

On occasions, much of what is tipped into the garbage truck is air. Think about this.

If the Strategy is to reduce waste, then do not provide the means that counters this objective.

Try something different. The old 240/140 litres bin paradigm is a relic of yesteryear and is counter-productive, and has no foundation in the modern world of a "circular economy", waste minimisation, and personal responsibility.

Smaller bins could be trialled. If FOGO is to be retained, then the opportunity could be explored for an 80/80/80 litres bin combination. Some interstate Council's now use 80 litres bins. Unfortunately, Green Industries SA⁴ does not identify the smaller bin, but that is no reason not to trial it.

- (4) Cause and effect. If the FOGO project is to provide information for future strategic changes, then I would hope that alternative actions would be explored prior to any final decision. For example, there are many in the community who undertake their own composting and conversion of organic material on their properties. Our household is one, where no organics are sent off-property.

People undertaking personal actions are not rewarded for good behaviour, they are penalised by a compulsory, inflexible, and outdated "service charge". It is inequitable and contrary to the objectives and actions in the Draft Strategy.

Thus, an opt-out option supports personal responsibility, encourages full-system household recycling, and would result in less bins for collection.

I have described this matter in a bit more detail later.

- (5) One significant action involves the deployment of neighbourhood household organic waste bins⁵ where one large bin serves a number of properties. This could be introduced as a trial for proof of concept, and then subsequently introduced more widely in a neighbourhood context.

In general neighbourhood settings, vermiculture systems could be maintained by citizens to return the value-added material back to land.

The proposed Environment Centre could eventually perform an integral role in a neighbourhood system.

⁴ Source : https://www.greenindustries.sa.gov.au/documents/GISA_Sustainable_Kerbside_Services_Web.pdf

⁵ Source : <https://wormsdownunder.com/products/worm-mod>

In flats and units, where there are many in Port Lincoln, an option is to use a smaller variation⁶ vermiculture system that residents could place household organics into. How this would be managed could also be a function of the Environment Centre in conjunction with the involvement of Council's proposed Waste and Resources Officer.

The end result would be greater efficiency in waste handling, less contamination, and less material that is transported to the final stage of sorting and disposal. It should also mean less cost.

- (6) The Draft Strategy could be improved with specific actions in other residential settings (e.g. elderly flats and units, residential aged care) that have higher occupation densities but with low waste recovery/conversion systems. Such strategies could significantly reduce the organic waste volume, thereby resulting in collection efficiency.

Understanding the waste stream produced from such facilities would be an important step to compliance with their own environmental strategies.

E. Action Plan (pg. 8)

The following comments are offered, and if they are considered to have merit then it is best for Council to allocate where they are inserted into the specific objectives.

- (1) Much appears to have been focused on the success of Council's FOGO pilot (Action 1), but it is just one strategy of several that deserve attention. I have already described a second opportunity above. But there is a third - at the household scale - that is not specifically part of the Draft Strategy. An example is what many in Eyre Bioregional Permaculture Group have been doing for years, and that is composting and vermi systems (worm farms) on their properties.

Reliance just on the FOGO program will be at risk of limiting self action or compromising other methods.

I consider the household scale system could operate conjunctively with the FOGO service. For those who choose self action then they should not be subsidising via their waste/recycling service charges the actions of those who choose the purported 240 litres FOGO bin.

This matter of inequity has to be resolved by Council, just as should the matter of reward for good behaviour. More is discussed later on this matter.

- (2) **Kerbside FOGO collection** as described in the Draft Strategy seems to have been prioritised over personal/collective waste action. It appears that Council has no data on the quantity of material voluntarily diverted and also the number of households that are diverting material from the waste stream. It also appears that funding is planned to be directed all to kerbside collection. I consider this is a significant gap in the Draft Strategy. As already alluded to, the question whether a FOGO bin will become part of a residential property's "service charge" will need to be resolved.

I have already mentioned about neighbourhood systems for retention of organic and garden waste. Every household should not need its own organic waste bin, therefore as an extension of the FOGO program, neighbourhood systems could be trialled i.e. one green waste bin per group of dwellings (either flats, units, or houses), stationed in strategic locations. Conceivably, just one bin could serve 6 properties, thereby resulting in an 83% reduction in FOGO bins collection.

⁶ Source : <https://mazingproducts.com.au/product/large-bag-worm-farm/>

Whatever the potential reduction may be in this “service”, the benefit is time in collection and handling, and time is money. Less stoppages of the collection vehicle would result in significantly less overall cost.

The FOGO program is just one spoke in the waste wheel, but the Draft Strategy elevates it to a pivotal part. Waste plastics is just as significant, given the environmental harm that has been caused and continues to be caused.

I suggest that far greater emphasis on plastics should be in the Draft Strategy. See point (10) later.

- (3) **Organic waste.** Of concern is [the statement at Council’s website](#) that “75% of all the organic materials collected” is via the general rubbish bin, with the result being an estimated 4,000 tonnes of CO₂ emissions annually. If 12,281 tonnes are “landfill” dumped (table at pg 5 of the Draft Strategy), does this mean that about 9,000 tonnes of green waste is placed into the general bin?

This is an extraordinary quantity of material that is a valuable resource not being taken advantage of. How can this be possible?

Note that 4,000 tonnes of CO₂ emissions annually is equivalent to being produced from about 10,000 tonnes of household organic waste, so the statement above is reasonably accurate.

Also at [Council’s website](#) is a different statement - “60% organic materials ... equating to 2500 tonnes annually (with) more than half (being) food waste.” Which figure is accurate?

Nevertheless the critical matter is cost. The carbon [“shadow price”](#) is now \$70 per tonne, thus resulting in a potential **cost of \$280,000 annually on 4,000 tonnes CO₂**.

At [the spot price](#) of about \$34 per tonne, **the opportunity cost to the people of Port Lincoln is \$136,000 annually.**

Either cost should be reason enough to elicit change. The community should be advised accordingly.

Thus, the Draft Strategy could contain further detail about costs and opportunities foregone by not changing habits.

If all green and organic waste can be diverted and locally composted, Council might also consider placing the “saved” ACCUs (Australian Carbon Credit Units) on the market. It is worth examining. Note that methane emissions are not accounted for at both the former dump sites at Port Lincoln, and the Veolia site at Butler, and is another matter entirely.

The systems for commercial composting are undeveloped in Port Lincoln. The Draft Strategy should describe where organic material collected through FOGO will be deposited and composted.

A business opportunity exists for a composting facility, one that is complementary to the existing fish waste system operated privately. One Port Lincoln landscape materials supplier obtains “organic” composted material from Mt Gambier, which is an extraordinary distance to obtain a soil product to sell to the Port Lincoln community. The end-result is tonnes of fossil fuel transport emissions that are scarcely accounted for in the sale of the product. It is not a scenario that dovetails with the Strategy.

The same argument is applied to the transport of Port Lincoln wastes to Veolia’s site “Glenfield” at Butler.

It is noted that Veolia derives benefits from the fruits of its labours in every link of the waste

management chain.

- (4) **Community-wide information** is critical to the success of any program, and it must be clear and persistent. If there is no on-going funding allocation, and weak established business commitment, poor outcomes will likely result.

An example is the Redcycle program, now collapsed. The public became familiar with the system and were responsive, but it was operated on weak foundations and an absence of government and local government involvement. The businesses receiving the soft plastics waste also avoided a degree of responsibility.

If we're talking about the circular economy, then there are a number of options that can be undertaken here in Port Lincoln.

In addition, the Draft Strategy could contain an Appendix that lists existing sites/businesses that receive waste materials. The [list at Council's website](#) is not complete, therefore an up-to-date inventory should be compiled as soon as possible and the information be made available community-wide.

Commercial properties and businesses produce substantial packaging waste, but it has not been emphasised in the Draft Strategy. Again, it is critical to know the types and quantities of wastes from industry and businesses, and how they are handled. For example, how much food waste is produced? And what happens with it?

How much plastic wrapping and polystyrene and cardboard packaging waste is produced? And what happens with it?

Once the community knows and understands the whole picture about wastes then the reasons for action are made much clearer.

- (5) In my view, keeping a "watching brief on soft plastics recycling initiatives" (Objective 2 in the Action Plan) is a plan of no action. A cautious approach is no solution to solving the ever-increasing scourge of the soft plastics problem. Rather than wait for others to find a solution that Council can follow, take the lead right now.

Here's an opportunity which I described in the August Newsletter for EBPG.

Resin8 - All types of plastic from 1 to 7, and this includes all those soft plastics formerly taken by Red-cycle, can be utilised in a process to produce what is called an eco-aggregate. The end product is used in place of mineral aggregates in concrete products such as building blocks, pavers, and pipes. See [CRDC Global](#) and this page [CRDC](#).

Australia's [first CRDC factory](#) has recently opened in Melbourne at a cost of just \$2.5m.

Consider that Port Lincoln is almost at the furthest extremity of an arc of population that stretches around the southern and eastern seaboard of Australia. We are remote, therefore all materials that enter the region should strategically be re-processed here and not transported out of the locality to hundreds of kilometres distant.

In terms of plastics wastes that come into our communities, they should never be transported long distances away because of the huge carbon emissions costs and environmental costs. They should never be dumped into holes in the ground, and should never become micro-plastics that are now

a ubiquitous part of the anthropocene.

CRDC's solution Resin8 should be urgently examined by Council for implementation here. The benefits are significant, and I see no reason why DCLEP and PLCC could not become major stakeholders in the enterprise. The economic and environmental benefits are significant. Potential partners are the former Redcycle participants, businesses, and the general investor.

There is scope to engage with Hallett Group to combine its waste crusher sand with Resin8 to produce building blocks for low cost housing. The material could also be used in Hallett's concrete products. Hallett's participation in R&D would align with its business scope.

This is an example of the circular economy.

It is recommended that a Council delegation travel to Tottenham (Melbourne) to view the facility.

Importantly, further investigations on this crucial prospective enterprise are recommended, to which a community interest group could be engaged.

- (6) **Establish community and regional connections.** For example, a **community waste and resources group** would be an invaluable resource to further the aims of the Strategy and to assist with its delivery. The partnerships that are mentioned in Action 2 are essential. Such arrangements must be resourced appropriately.

Connections would need to be forged with small regional enterprises such as Sarah Prime's Next Gen Waste Co at Butler, which recently was awarded \$60,000 for "circular economy market development"⁷.

Nano operations such as the one that I have established have sought no external funding, it has all come from personal endeavours.

Which direction should Council go? There is no time to waste, and in my view organisations like the apparently short-lived EPLGA Waste to Resources Committee can be reactively slow and cumbersome. If "governance structures" are a priority, then Council would do well to examine carefully how the most effect can be achieved in the shortest time. Community behavioural change is imperative.

Council might consider supporting 'lighthouse' projects and to investigate potential solutions such as Resin8 right now.

Misalignments currently exist with the Objectives in the EP Waste and Resources Strategy 2023-2033 and these have been carried through to the Draft Strategy. This commentary describes a number of the misalignments.

With Council's involvement, one catalyst for change in community behaviour and action could involve the proposed Environment Centre. It will be noted that I have referenced the proposed centre on a number of occasions in this commentary, the reason being that grass roots action stands the best chance of survival when common ground is available to the general community. On other words, a place of action.

- (7) **Builders' waste** is not specifically mentioned in the Draft Strategy, but the building industry is a very significant producer of materials that can be recycled or re-purposed. I have seen enormous amounts of offcuts and new building material being tossed into skip bins for no reason, thus resulting in a triple cost - first to the home owner, second to the general citizen's waste levy, and third to the overall environmental cost. Education of the building sector is imperative. I do not see

⁷ Source : <https://www.greenindustries.sa.gov.au/projects-funded>

skip bins as an answer on building sites because all they result in is profligate unthinking behaviour.

- (8) **A dump (or tip) shop.** This is also not specifically mentioned in the Draft Strategy. Many in the community I have spoken to have asked why a dump shop and repair shop has not been established. Aligning with the recommended Priority Action (at No. 2) would involve identifying the parameters, seek feedback from the community, visit other facilities, and then establish the operation.

I suggest that a dump/repair shop should be established at a suitable site and be a separate community-owned and operated enterprise.

Existing op shops in Port Lincoln demonstrate the large community acceptance and need for recycling, but these outlets are limited for space and by the materials that can be stored. A [dump shop](#) is the ideal space to sort builders' waste into useable materials for the benefit of the community, and to ultimately reduce the cost of dump disposal.

All this requires a change in thinking and behaviour.

- (9) **Education** is perhaps the most critical long-term strategy of all, because behavioural change is clearly necessary across all sectors of business and the community. Part of education is mentioned in Objective 2, but it deserves to be allocated as Objective 6 and to be undertaken by the proposed "Waste and Resources Officer" position. Education, training, and information delivery are essential actions.

Aspects that have been described above - particularly with CO₂ and methane emissions, and micro-scale waste management - should become key elements of community information.

Education and information programs should be devised for delivery to the general community, businesses, industry, the building sector, schools, sports associations, and Council's own activities. Education resources are available from many organisations such as [KESAB](#) and [cool.org](#) but are not mentioned in the Draft Strategy.

Accordingly, I consider that being specific on such matters allows greater clarity for the general reader.

I suggest that Council's primary contractor [Veolia](#) be asked about education, as it seems that this company has little if any presence in SA about community education programs, and which is in contrast with what [Cleanaway](#) offers. Remember, waste management is everyone's problem, even those whose livelihood is derived from waste.

Education also includes business-to-business assistance by way of waste audits, waste minimisation, materials re-use and conversion, storage and collection, and local business development arising from business waste (e.g. plastics).

Community-initiated education is already happening but Council would most likely not know about it. For example, I recently conducted a household waste plastics session as part of the broad range of monthly events that are undertaken by EBPG.

A potential significant community education benefit would be available through the Environment Centre project.

Given the essential role that education and information can play, I suggest the allocation of just \$2000 in Objective 2 of the Draft Strategy is insufficient by at least a factor of five.

Education and information must be embedded in budgetary allocations.

(10) **Small-scale solutions.** Community responses involve many methods of waste diversion, and the Draft Strategy would be a more comprehensive document for including and supporting household-scale actions. As stated earlier, there does not appear to be any data on the proportion of waste diversion arising from personal/household responsible actions. As an example, here is what is undertaken on our property.

- Glass containers (bottles, jars) are taken to Rick Daniels Waste Recycling
- Metals are taken to EP Recycling Specialists
- Paper and cardboard are shredded and composted on site, and a quantity turned into briquettes
- All plastics, including soft plastics, are sorted into the various PICs (Plastics Identification Codes) and then shredded in a plastics shredder for conversion to other products
- Liquid paperboard containers are shredded for future trialling in stabilised blocks using crusher sand
- Green waste is shredded and used either on paths, as surface mulch, or composted on site
- Food scraps and other organics are either fed to the chooks, deposited to worm farms, or sent to composting bins
- Small batteries are deposited at Mitre 10 or Bunnings
- Used plastic plant pots are deposited at Bunnings recycling bin
- E-waste is rare but can be deposited at Harvey Norman or at the RRC
- Waste automotive oil is deposited at the rear of Supercheap Auto, which also receives the oil containers. It is noted that the RRC charges a fee for this service.

We do not use the waste or recycling service, but the penalty for 2024/2025 in not using the “service” is \$379.

Action 3 (pg. 9) is about “Actions to ...decrease the amount of waste being transported to landfill ...” and a Priority Action is to “identify and assess potential solutions ... and other community initiatives”.

As indicated earlier, in August this year I conducted an “All about plastics” event at our house as part of EBPG’s monthly events. Attended by more than 26 concerned citizens, they were shown how to identify the PIC on various plastic packages, how to separate the plastics for shredding, the operation of a small plastics shredder, the next stages of conversion, and product manufacture. These people were informed about micro-plastics, the difficulties in food packages that contain stick-on labels and mixed plastics, and how policy settings do not support personal actions.

This is the type of event that needs to be run periodically for the general community and the aspiration is for it to be conducted at the proposed Environment Centre.

This is where Council can engage directly with the community.

We have also sponsored several other events for EBPG, Salt Festival, and Probus on our property to demonstrate other sustainable systems, such as composting, food production, onsite water and wastewater management, off-grid energy, and more.

In terms of the Draft Strategy, what we are doing on our property means we do not need a FOGO bin or any other bin. The Draft Strategy could be strengthened by including specific tasks about, and identifying, personal actions and properties similar to ours. It would then be appropriate to generate a new policy of support where voluntary community actions are not penalised. In this respect, I suggest that the “service” charge be directed to the proposed Environment Centre for subsequent disbursement for a “re-green Port Lincoln” program aligned with National Tree Day.

Conclusion

This brief commentary has highlighted some steps that are suggested to be included in the Draft Strategy. Several significant opportunities are also described, including the Resin8 facility which has the potential to solve a very large plastics waste problem, and at the same time create a very useful product that can be used locally.

Personal responsibility and community education have been emphasised, but will require resource commitments.

Actions should become a priority as it is now time to put flesh on the bones of the EP Waste and Resources Strategy 2023-2033. The Draft Strategy can become the first step in this process by being more specific about its stated actions.

Above all however, is the need to observe, to understand the flow of materials in and out of the community, to seize an opportunity when it comes along, to be informed and to learn and to educate, and to persist. The Strategy should always be a live document that the community can reference.

I am available any time to clarify or discuss the contents of this commentary.

I wish Council well in its endeavours to confront and manage the community's waste problems.

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Port Lincoln