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The Parliamentary Officer Environment,
Resources and Development Committee
GPO Box 572 ADELAIDE SA 5000
Via Email: ERDC.Assembly@parliament.sa.gov.au

Dear Parliamentary Standing Committee Members, Research Officer and Parliamentary Officer,

Response to Inquiry into the Recycling Industry from the Australian Organics Recycling Association
About Us

The Australian Organics Recycling Association is the peak body for the organics recycling industry in Australia. AORA see the efforts of our Processing Members at the heart of an organics circular economy based on organics recycling. The Australian Organics Recycling Association (AORA) envisages a future where recycling and reuse is the accepted management practice for surplus organic material and biproducts of human activity.

The continued success and expansion of the organics recycling circular economy that we drive is critical in achieving waste diversion targets set in the South Australian Waste Strategy 2015-2020 and in lifting the productivity and sustainability of the state's agricultural sectors.

We have 64 Processing Members nationally. Our South Australian membership includes:

- LARGE PROCESSING MEMBERS (3): Jeffries; Peats Soil and Garden Supplies; and Van Schaik's Bio Gro.
- SMALLER PROCESSING MEMBERS (3): SA Composters; Mulbartons Compost; Eco Waste and Composting Solutions.
- INDUSTRY ASSOCIATES and Others (13) – these include: Eastern Waste Management Authority, Limestone Coast RDA, Field Systems, Platfarm, BioBag World Australia, Microbiology Laboratories Australia, Leartek, Colby Industries, City of West Torrens, Rodenburg Waste Solutions and Sustaining Endeavour.

Organic Streams Processed

Green Industries SA has recently released the results of the South Australian Recycling Activity Survey for the 2017-18 FY. The results from this important annual survey indicate that:

- a. total landfill disposal for SA was 0.88 million tonnes, whilst 4.49 million tonnes of waste was diverted from landfill (83.6%).
- b. Of the 4.49 million tonnes of waste diverted from landfill, 1.1 million tonnes were organic.
- c. One million of this 1.1 million tonnes of organic waste are classified by GISA as having been sent for "Materials Recovery" (77% Recycled, 23% Rendered)
- d. The remainder, 100 thousand tonnes was sent for "Energy Recovery", (82% Timber, 18% Other)

AORA commends the latest SA Recycling Activity Survey report. Points noted by AORA are:

- Organics was the third greatest contributor to SA's recycling activity (1.1 million tonnes or 24%). Organics was behind masonry and soil in the Construction and Demolition Sector. Most organics recovered in SA were processed in SA (97%).
- The report unfortunately doesn't state how much organic material was recycled in SA over the FY2017-18. However, AORA have deduced from the report that 767,100 tonnes of organic materials were recycled in FY2017-18¹.
- In FY2017-18, Organics recyclers processed:
 - 316K tonnes Waste Grease, Sludges, biosolids & miscellaneous. – stable as compared with previous year.
 - 257K tonnes Garden Organics – which was DOWN 12% on the previous year probably due to reduced rainfall.
 - 9.1K tonnes Food Organics – which was UP 12% due to increased commercial food waste.
- The report notes that most food waste still goes to landfill – approx. 200,000 tonnes per year. This represents a big opportunity to the Organics Recycling Industry with flow on nutritional benefits for South Australian soils. But strategies to manage contamination must also be formulated and funded.

On the China Sword Policy

Continuation of targeted and adaptable kerbside collection services through a 3-bin collection service are key to ensuring that contamination is kept low in the organic streams that AORA Processing Members process.

The SA Recycling Activity Survey report for FY2017-18 report notes that “An ongoing challenge for some re-processors is contamination of incoming tonnes of Organics”.

In parallel with China's National Sword Policy there has been a rapid rise in plastic packaging and disposable single-use plastic products being replaced with bioplastic or natural fibre alternatives. These products facilitate expansion of the organics recycling circular economy by diversion of increased organic streams to the State's organics recyclers, provided consistent education and regulation is applied to prevent increase in contamination.

Low contamination rates for a council translate to lower gate fees for that Council as material is easier to process.

Our Products

Recycled Organic Products produced by AORA SA Members include compost, mulch, potting mixes and biochar. These products restore carbon and nutrients to depleted soils and are of consistent and high quality through standards such as AS4454 Compost, Soil Conditioners & Mulches. These products drive benefits in farming, parks and landscaping, land rehabilitation/conservation and domestic gardens:

- ✓ Increased water holding capacity
- ✓ Increased soil health - nutrients, soil biology
- ✓ Increased yields, Increased quality and consistency

¹ This figure was derived by taking the amount for total Organics Material Recovery in table 3.5, i.e. 997,100 tonnes and subtracting from this the sub-total given for Meat Rendering, i.e. 230,000 tonnes.

AORA promotes application-methods and benefits of compost and other recycled organics to farmers at workshops, seminars and at field visits. Our products are promoted responsibly within a broader integrated approach to improving soil health, tailored to each region's context and relating to key soil processes:

- Residue digestion.
- Nutrient cycling.
- Soil structure maintenance.
- Pests & disease regulation.

We find a recurring theme is that farmers are looking to improve the health and water holding capacity of their soils, which compost is shown to be effective in achieving. Compost and other recycled organics also play a significant role in sequestering carbon in soil, and with appropriate government support, our State's farmers could better access soil carbon credits through the Australian Government's Emissions Reduction Fund, ERF, which would also contribute to GHG-emissions abatement strategies at State and National level.

Leading speakers present the benefits of quality recycled organic products and a range of methods for application as part of pathways to building soil health. These events as well as policy and advocacy for our South Australian members are partly funded by AORA through a levy paid by AORA SA Processing Members. AORA SA is also assisted with in-kind support from presenters who are usually AORA SA Associate Members and largely donate their time.

Funding grants through the Adelaide Mount Lofty Ranges Natural Resources Management Board and more recently, from the Natural Resources SA Murray-Darling Basin, have also been critical in allowing events that engage farmers to be viably presented.

On existing funding support lines:

AORA members have received important support to help sustain and expand the organics recycling circular economy in South Australia, these sources of funding have included:

- Small AMLR NRM and SA MDB NRM Funding grants of between \$3K and \$5K towards AORA SA Grower Seminars, workshops, farm field-days.
- Some of our members have been successful in applying for GISA - Recycling Infrastructure Grants which have enabled organics recycling processing capacity to be increased or improved in various ways.
- A small GISA Circular Economy Market Development Grants has enabled one Associate member, Sustaining Endeavour to trial agricultural bioplastic mulch-film in order to eliminate problematic organic-plastic mixed waste streams in the Northern Adelaide Plains.
- AORA SA are now investigating Skilling South Australian funding on behalf of members.

On further support for our industry:

1. AORA SA invites State and Local Government levels to work more closely with us in helping promote the role our industry plays in adapting to the variations in organic waste streams generated throughout the state and continuing to recycle these into high quality, consistent and affordable recycled organic products.
2. There has been an increasing amount of food waste diverted from landfill to organics recycling facilities. In part this has resulted from funded programs and promotion

through GISA assisting councils to fund food waste diversion strategies and the efforts of Adelaide City Council and others in adopting and following guidelines for Sustainable Events, also Holdfast Bay Council who have trialled bioplastic produce bags at Foodland stores.

AORA seeks shared involvement in promoting favourable results arising from such strategies led by state and local government. AORA SA seek opportunities to profile the recycled organic products that result from such strategies back to the communities that generate the organic streams processed by our members.

3. AORA SA seeks closer inclusion in formulating and implementing SA strategies that address contamination in organic streams that our members process.
4. In June 2019 AORA SA highlighted its concerns with respect to the SA EPA's Draft Position Paper on Thermal Energy from Waste. As proponents of thermal energy from waste facilities seek to secure organic waste streams, the impact on the organics recycling circular economy in SA and its ability to expand, with consequent benefits to soil health in the state, must be considered.
5. AORA SA advocates for compliance and best practice in composting operations with respect to managing the environmental aspects and operational sustainability aspects of our industry, as well as Australian Standards that indicate the quality of recycled organic products.

Our Processing Members hold Environmental Authorisations issued by the SA EPA requiring compliance with operating conditions that safeguard the receiving environment. Through AORA SA our SA Processing Members consider various compliance related matters such as fire-prevention procedures. In another example, PIRSA have approached AORA recently to ascertain capacity of the organics recycling industry to accept mass poultry mortalities in the event of a severe disease outbreak.

AORA SA are keen to build closer engagement between our Processing Members and the SA EPA on fair and consistent regulation that underpins our industry's reputation as responsible local recyclers. AORA SA also seeks to build greater awareness across the SA Government about our industry, policy-settings and support required for continuing strong performance and sustainable expansion.

On further Support for Recycled Organic Products made in South Australia:

6. Both the State and local government generate organic streams that our Processing Members process and are therefore part of the organics recycling circular economy in South Australia.

In order to sustain and expand this circular economy, AORA seeks the support of State and Local Government purchasing-decision makers in purchasing recycled organic products like compost derived from their own waste streams, formalised as part of their Buy-Recycled strategies. AORA would also welcome an opportunity to engage local government parks and landscaping Officers and NRM Officers by delivering a workshop on the application and benefits of compost.

7. AORA SA seeks continuing support for grower workshops, seminars and field-visits from Landscape Boards (that will soon replace existing NRM Boards) and expanded support for events in regions further from Adelaide such as the Riverland and South East. Our dual objectives are to: drive demand for compost in the context of broader soil improvement programs in farming regions throughout South Australia; and to grow our Processing Membership as part of expanding the organics circular economy.

8. AORA SA are presently scoping a Soil Improvement Champions program for growers who attend our events and go onto use recycled organics as part of a soil improvement plan. We ultimately wish to profile growers and their soil improvement efforts and to see learnings shared on an online digital platform. Assistance from AMLR NRM and PIRSA is sought for this vision to be realised.
9. AORA SA seeks support for assistance from PIRSA towards a program that subsidises a portion of the costs that farmers face in developing and registering soil carbon sequestration projects under the Emission Reduction Fund. Assistance towards costs for soil Carbon testing are specifically sought, also for addressing the risk in this legislative opportunity that is still perceived as high-risk by most farmers.
10. Support for soil improvement planning and implementation projects using compost and other recycled organics in target agri-sectors and regions with low compost uptake, is also sought from PIRSA, like programs in other jurisdictions such as the California Department of Food and Agriculture Healthy Soils Program.
11. AORA SA has previously made a submission (via this [link](#)) to the Murray Darling Basin Royal Commission in April 2018. In our submission, AORA SA advised that we would welcome opportunities to establish compost and mulch application as a recognised Efficiency Measure for the purposes of the Basin Plan. AORA SA specifically sought Opportunities for our Processing Members, growers who are experienced in using our products and agronomists and other experts within our network to have appropriate consultation opportunities with those responsible for designing and implementing Efficiency Measures. This offer still stands.
12. AORA looks forward to continuing our excellent engagement with GISA to promote the benefits of recycled organic products from our industry and the role that our Processing Members play in enabling the organics circular economy. For example, the benefits from compost and other recycled organics in improving the nutrition, water holding capacity and carbon sequestration in South Australian soils could be described in the "Environmental Benefits" section of the GISA Annual Recycling Activity Survey Report. AORA seeks for our industry, products and results be more actively and widely promoted.

AORA SA looks forward to engaging with departments across the SA Government on the above opportunities to secure, expand and promote what the SA organics recycling industry does.

We look forward to further discussing the matters raised above, please do not hesitate to contact either of us, Peter on 0418 791 921 or Uma on 0452 537 266.

Yours Sincerely,



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