

20 December 2024

Attn: W2R EPP Review
Environment Protection Authority GPO Box 2607
ADELAIDE SA 5001

Via email: epawastepolicy@sa.gov.au

Submission to the Environment Protection (Waste to Resources) Policy 2010 Review

The South Australian Chamber of Mines and Energy (SACOME) is the leading industry association representing the South Australian resource and energy sector, a powerhouse of the State's economy.

SACOME acknowledges that the *Environment Protection (Waste to Resources) Policy 2010* (W2R EPP), through the *Environment Protection Act 1993* (EP Act), provides the regulatory framework for South Australia's waste management objectives.

Furthermore, SACOME recognises the Review as an opportunity to examine policy initiatives that contribute to a South Australian circular economy as outlined in the *Beyond recycling: Moving SA towards a circular economy* Discussion Paper.

SACOME has previously advocated for the development of a battery circular economy and establishment of a South Australian program to recycle photovoltaic (PV) solar panels. SACOME and its member companies recognise the benefits offered by creation of a circular economy through additional value derived from existing materials, contribution towards environmental targets and the development of new industrial capacity for South Australia.

SACOME's responses to relevant questions posed in the Discussion Paper are provided below.

1. General Comment – Development of a Circular Economy

SACOME supports development of a circular economy at both a State and national level.

SACOME notes the alignment between State and Federal Governments in terms of realising potential economic and environmental benefits arising from creation and growth of a circular economy, and its importance as part of an ecosystem that supports growth of 'green' industries, decarbonisation and the energy transition.

SACOME notes that the Australian Government's *Future Made in Australia* policy establishes a National Interest Framework which prioritises investments that assist in achieving net zero objectives and contribute to economic resilience and security.

These national goals coincide with the integration of circular economy objectives in the *Environment Protection (Waste to Resources) Policy 2010* Review. In realising this alignment, SACOME submits that, as a guiding principle of the review, consideration should be given to ensuring alignment of State and national policies to promote a nationally cohesive approach.

Further, SACOME emphasises the importance of collaboration with industry in the development of policy settings for the circular economy. Ongoing collaboration, communication and consultation is important to achieving effective integration, compliance, development and investment.

SACOME acknowledges that much of the infrastructure and skilled labour needed to facilitate re-processing and re-manufacturing in a circular economy may already be sourced within the State. As such, collaboration between industry and government offers significant opportunity to accelerate development of the circular economy.

2. Broadening the policy objective (7.1)

SACOME submits the development of a circular economy should be progressed as an outcome of the W2R EPP Review and supports the inclusion of 'circular economy' as an objective.

A circular economy assists the South Australian Government's objectives of decarbonisation and supports the energy transition. The reuse and recycling of critical materials has the potential to minimise landfill waste and creates opportunities to extract additional value from existing resources.

SACOME recognises the potential issue of regulatory duplication and submits that existing regulatory frameworks that govern the operation of the resources sector should be considered when considering a circular economy scheme design.

SACOME submits that there is a need for further clarity regarding the implementation of 'climate change mitigation' as an objective. It is unclear if such a change is intended recontextualise the interpretation and application of existing provisions. A clear definition of 'climate change mitigation' and a statement as to how such an objective may impact application of provisions would represent a step towards this goal.

Further, SACOME submits that 'cohesion between State and national policies' should be added as an objective.

Australia's Circular Economy Framework and National Battery Strategy address issues dealt with in the W2R EPP at a national level but are notably absent in the Discussion Paper. Alignment of regulatory requirements, potential incentives and taxonomy would assist in the development of consistent and manageable standards of practice across industry.

3. Circular Procurement (7.9)

SACOME supports development and implementation of clear procurement decision making guidelines to facilitate the establishment of a circular economy and develop a market for recycled materials.

Embedding circular economy principles into procurement policies will assist in creating a market for recycled materials and a framework for industry.

Market participation can be further incentivised by leveraging opportunities to utilise existing production and logistics facilities/infrastructure relevant to development of the circular economy.

SACOME members have advised that existing facilities like smelters, ports and rail infrastructure can all be leveraged to support development of the circular economy supply chain.

4. Contaminants and chemicals of concern (7.12)

South Australia's operators have a consistent record of successfully meeting their regulatory obligations regarding management of contaminants and chemicals of concern. SACOME and its member companies recognise that the continued activity of

the resources sector is predicated on adherence to regulatory requirements and scientific standards.

SACOME submits that continuing dialogue with industry will allow for the efficient development of regulatory and operational frameworks to manage contaminants and chemicals of concern as they relate to development of the circular economy.

SACOME further submits that existing structures that are deemed fit for purpose should be integrated into circular economy frameworks to reduce regulatory duplication.

Conclusion

SACOME and its member companies remain committed to constructive engagement with the EPA throughout the Review process and welcomes the opportunity to provide further feedback once the draft EPP is published.

Yours sincerely



Rebecca Knol

Chief Executive Officer

South Australian Chamber of Mines & Energy