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To DPTI Planning Reform
By Email: DPTI.PlanningReformSubmissions@sa.gov.au

Comments from AORA on the Planning and Design Code for South Australia – Statewide Code

About the Australian Organics Recycling Association, AORA

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 byproducts of human activity.

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 (4): SA Composters; Mulbartons Compost; Eco Waste and Composting Solutions and North Waste and Composting Solutions.

Organic Waste Processing Facilities (P2340)

AORA's feedback to DPTI Planning Reform relates to planning and design relating to Organic Waste Processing facilities, described from page 2340 of the DRAFT PLANNING AND DESIGN CODE, STATE PLANNING REFORM - PHASE THREE (URBAN AREAS), OCTOBER 2019. AORA SA Branch Processing Members are all licenced to undertake Composting Operation by the South Australian Environment Protection Authority and consequently are familiar with the operating requirements that are linked to the requirements set out in the Draft Planning and Design Code. However, AORA would like to also see inclusion of the important organics circular economy benefits of well-situated Organic Waste Processing Facilities that are within reasonable freighting distances from waste inputs and from end-user markets.

Planning decisions relating to siting of proposed organic waste processing facilities is a key strategic issue to be detailed in the upcoming national industry policy document, 20:20 VISION: AUSTRALIA'S WORLD LEADING ORGANICS RECYCLING INDUSTRY OF 2040, AND HOW TO GET THERE. This will be launched at the AORA National Conference from 1-3 April in the Hunter Valley.

Major organic recycling processing facilities need to be located no more than 60-120 minutes travel time of their largest input and end user markets.

Adding additional freighting distance significantly affects the financial and environmental viability of the supply chain. Increased travel distance also has a negative impact on our industry's

capacity to meet stronger government targets for waste stream reduction and resource recovery, and consequently reduce the capacity to meet end user demand for recycled organic products such as compost.

Hence unreasonable freighting distances add significantly to economic, environmental and employment costs in the organics recycling sector threatening expansion of the organics circular economy and increased employment that this can bring.

To avoid this happening, state governments must ensure the following measures:

- 1) that their planning and design codes allows for and actively promotes the development of facilities within this travel distance window.

- 2) Further, state governments must ensure that local governments are acting within both the letter and spirit of their planning and assessment processes, to ensure that there are no undue or inappropriate delays or refusals.

If the above measures aren't adequately addressed, the capacity of the industry to meet strong resource recovery targets and demand for quality product is likely to falter.

This product shortfall would negatively impact our industry's capacity to meet state and national targets to mitigate the impacts of drought, retain water, improve soil quality, address soil salinity, assist in bushfire recovery, improve agricultural productivity, and deliver the benefits of soil carbon capture.

Design in Urban Areas - All Developments – 4 or more building levels Site Facilities/Waste Storage (P2235)

AORA would like to see these provisions as they relate to green organics to be extended to all developments regardless of the number of building levels to ensure that where the local government provide green organics and/or food organics collection services that the new development allows for unhindered collection of green organics and food organics for collection.

Planning Considerations for future Industry Expansion

In view of the compelling drivers requiring the South Australian Organics Circular Economy to expand, AORA would like to see planning considerations for future Organic Waste Processing Facilities to be established. These including areas of land set aside for organics recycling, including sites that previously contained intensive industries, where suitable, as well as appropriate zoning to prevent encroachment by sensitive land-uses.

We look forward to further discussing the matters raised above, please do not hesitate to contact either Peter on [REDACTED] or Uma on [REDACTED].

Yours Sincerely,

Peter Wadewitz
National AORA Chair & AORA SA Branch Chair
Director, Peat's Group

Uma Preston
AORA SA Secretary and Policy
Officer