WASTE MANAGEMENT STRATEGY 2025 - 2035
PREPARED FOR BALRANALD SHIRE COUNCIL

MAY 2025 – FIRST DRAFT

HEAD OFFICE – VICTORIA
10 – 12 Church Street
North Geelong VIC 3215
PO Box 1374
Geelong VIC 3220

Phone: 1300 500 932
Fax: 61 3 5221 2666
admin@ctman.com.au

QUEENSLAND
Suite 16 Capalaba Business Centre
39 Old Cleveland Road
PO Box 1057
Capalaba QLD 4157

Phone: 61 7 3390 1685
Fax: 61 7 3390 3909
queensland@ctman.com.au

NEW SOUTH WALES
PO Box 8128
Kooringal NSW 2650

Phone: 1300 500 932
Fax: 61 3 5221 2666
admin@ctman.com.au

TASMANIA
PO Box 337
Newstead TAS 7250

Phone: 1300 500 932
Fax: 61 3 5221 2666
admin@ctman.com.au

www.ctman.com.au

ACN: 072 083 795
ABN: 15 072 083 795

DOCUMENT CONTROL

CT Management Group P/L PO Box 1374 GEELONG VIC 3220 Mobile: Robert Miller 0408328791 Email: admin@ctman.com.au Web: www.ctman.com.au	Document: Balranald Shire Council – Waste Management Strategy
	Project Manager: Jarrod Bryant
	Author: Robert Miller, Paul Somerville, Jarrod Bryant
	Date: May 2025
	Synopsis: The Strategy provides a comprehensive plan for managing waste sustainably while addressing the unique challenges of a low-density rural population, limited financial resources, and evolving regulatory requirements.

CONSULTANTS DISTRIBUTION SCHEDULE

Version No.	Date	Distribution	Reference

SCHEDULE OF ADOPTION

Version No.	Date	Comment	Reference

Disclaimer and Information Statement

This report is issued by the CT Management Group Pty Ltd and the information in this report is current as at the date of publication. The information and/or the recommendations contained in this report have been compiled and based on the information, records, data and any other sources of information supplied by you. Accordingly, the accuracy of the information and/or recommendations in this report relies entirely upon the information and material supplied by you. Whilst we have exercised all due care and skill in compiling the report, you should confirm the accuracy and reliability of the information and material we have relied upon in producing the report.

The information contained in this report is confidential and you should only read, disclose, re-transmit, copy, distribute or act in reliance on the information if you are authorised to do so. This report may also contain information, systems or data which is the property of the CT Management Group Pty Ltd. In these circumstances, the property referred to will remain the property of CT Management Group Pty Ltd and the CT Management Group Pty Ltd has in no way waived or altered in any way its ownership rights, or provided consent for use by the report recipient, unless expressly provided in the report.

TABLE OF CONTENTS

PART A – INTRODUCING OUR STRATEGY ***7***

1. Executive Summary ***8***

2. Recommendations ***10***

3. Introduction ***13***

3.1 Purpose and Scope 13

3.2 Waste Management Context 13

3.3 Strategy Review Cycle 16

3.4 Strategy Acknowledgement 16

PART B – KEY DRIVERS ***17***

4. Overview – the challenges and opportunities ***18***

4.1 Community aspirations 18

4.2 Legislative and Regulatory Context 19

4.3 Waste Hierarchy 20

4.4 Circular Economy 21

PART C – WHERE ARE WE NOW? ***23***

5. Balranald Shire profile ***24***

5.1 BSC – Current Waste Management Services 25
5.1.1 Household and Commercial Waste Collection 25
5.1.2 Landfills and Transfer Stations 26
5.1.2.1 Landfill Plans 28
5.1.2.2 Landfill Operating costs 29
5.1.3 Waste and recycling performance 29
5.1.4 Fees and Charges 31

PART D – RESOURCE RECOVERY OPPORTUNITIES ***32***

6. Balranald Shire resource recovery opportunities ***33***

7. Logistical constraints ***33***

7.1 Neighbouring landfills 33

7.2 Logistical/demographic challenges and Exemption opportunities 34

7.3 BSC – Waste Management Contracts 34
7.3.1.1 Landfill Contract discussion 35

7.4 Fees and Charges 36

7.5 Moving from a 1-Bin system to a 2 or 3-Bin system 37

7.6 Waste Data/Composition and Performance 38

7.7 Waste Streams 40
7.7.1.1 Diversion Rate 41

7.8 Waste Collection Operational details 42
7.8.1 Discussion 42
7.8.2 Collection solution option 42

7.9 FOGO processing options 43
7.9.1 The Business-as-Usual approach 43
7.9.2 Supporting and expanding at-home composting 43
7.9.3 Disposal of food organics direct to sewer 44
7.9.4 Develop a FOGO facility within BSC 45

7.9.5 Transport FOGO waste to a facility outside of the BSC region 45
7.9.6 FOGO Financials – the options 45
7.10 Emissions 46
PART E – THE STRATEGIC DIRECTION AND HOW TO GET THERE 47
8. The Strategic direction and how to get there 48
8.1 Action Items 48
8.2 5-year Implementation Plan 50
APPENDIX 1 – BSC WASTE MANAGEMENT STRATEGY PROJECT METHODOLOGY 54
APPENDIX 2 – BACKGROUND REVIEW 56
APPENDIX 3 – COMMUNITY CONSULTATION MEETINGS 64
APPENDIX 4 – WASTE MANAGEMENT CONTRACTS 65
APPENDIX 5 – LGNSW 2024-25 ADVOCACY PRIORITIES 66

LIST OF TABLES

Table 1: Recommendation Summary 12
Table 2: The hierarchy of responsibility for waste management 20
Table 3: NSW Government (2019) population projections for Balranald Shire 2016-2041. 24
Table 4: Residential kerbside bin waste disposal items – permissible and non-permissible 26
Table 5: Landfills operating days/times 27
Table 6: Balranald Landfill/Transfer Station site details 27
Table 7: Euston Landfill/Transfer Station site details 28
Table 8: BSC Waste Management operations financial performance 2022/23. 29
Table 9: BSC Sources of waste (total) 29
Table 10: Source of waste received at Balranald Landfill & Transfer Station 30
Table 11: Summary of BSC Waste Management Contracts 35
Table 12: Comparison of a selection of BSC waste disposal fees with neighbouring NSW Councils. . 36
Table 13: Kerbside tonnages & resource recovery rate 40
Table 14: Kerbside Composition 40
Table 15: WARR Waste Diversion Targets 41
Table 16: Summary of FOGO management options estimated costs. 46

LIST OF FIGURES

Figure 1: The waste hierarchy guides preferred outcomes 21
Figure 2: A circular economy retains materials in their highest productive use. 22
Figure 3: NSW Government (2019) population projections for Balranald Shire 2016-2041. 24
Figure 4: Photo of Balranald Return and Earn location. 26
Figure 5: BSC – Waste services primary fees 31
Figure 6: Map of the areas/towns surrounding Balranald and Euston – disposal locations 33
Figure 7: Hay Shire Council 3-bin system details (Source: Hay Shire Council website) 38
Figure 8: Example of the type of bin composition audit details BSC is recommended to collect. (Source: Central Coast Council Waste Resource Management Strategy) 39
Figure 9: Photo of a Twin compartment side loader rubbish truck. 43
Figure 10: Composting example - Tumbleweed 240L compost bin. 44
Figure 11: RAMJO area – Balranald is an associate Council. 62

GLOSSARY

C&D	Construction & Demolition.
C&I	Commercial & Industrial.
CDS	Container deposit scheme.
Combustion	The combustion of waste materials involves the complete burning of waste materials in an oxygen-rich environment to create ash, flue gas and heat.
CRC	Permanent drop-off centre for common household problem wastes that cannot be collected via council kerbside waste and recycling collection services.
FOGO	Food organics and garden organics waste.
MSW	Municipal solid waste.
Organics	Organic waste materials including paper and cardboard, food waste, green waste and timber.
RAMJO	Riverina and Murray Joint Organisation.
Recovery	Proportion of total waste diverted from landfill. Also referred to as Landfill Diversion Rate.
Recyclables	Waste materials able to be recycled including paper and cardboard, glass, plastics and metals.
Recycling	A set of processes (including biological) that converts solid waste into useful materials or products.
Reuse	Recovering value from a discarded resource in its original state without reprocessing or remanufacture.
Treatment	Processing of waste materials that alters its physical and/or chemical form.
Waste Management Hierarchy	An internationally recognised concept which lists waste management hierarchy options in order of preference according to their sustainability and environmental impacts.
WaSM	Waste and Sustainable Materials.

PART A – INTRODUCING OUR STRATEGY

1. EXECUTIVE SUMMARY

The Balranald Shire Council (BSC) **Waste Management Strategy (2025-2035)** provides a comprehensive plan for managing waste sustainably while addressing the unique challenges of a low-density rural population, limited financial resources, and evolving regulatory requirements.

The strategy aligns with **NSW Waste and Sustainable Materials Strategy 2041 (WaSM Strategy)** and the **RAMJO Regional Waste and Resource Recovery Strategy (2022-2027)** to support waste minimization and improved resource recovery.

Key Challenges identified in the Strategy are as follows:

- **Lack of data**: The data that Council has available is not sufficient to make informed waste management decisions moving forward. Data elements such as the following will add significant value to Councils decision making processes:
    - A **waste composition audit** of the red lidded bin.
    - **Truck weight** details collected at least 4 times over a 12-month period (preferably spread out over the year to capture volumes during each season – winter, spring, summer, autumn.
    - Volume of **other waste streams** being received at Balranald and Euston Landfills.
- **Financial Constraints**: The high cost of new waste programs (i.e., Food Organics and Garden Organics - FOGO) versus limited council revenue makes implementing some best-practice waste management services financially challenging.
- **Lack of Recycling & Organic Waste Processing**: No kerbside recycling or FOGO service currently exists, making waste reduction difficult.
- **Landfill Management**: Estimating Landfill remaining useful life years is difficult in the current environment given the lack of data. Example: the **Balranald Landfill has an estimated 90-year lifespan**, but data collection on waste volumes, composition, and operational efficiency is currently insufficient for long-term planning.
- **Cross-Border Waste Issues Management**: The **Euston Landfill** is receiving large volumes of Victorian waste without financial benefit to the Council, creating operational and environmental risks.
- **Limited Waste Diversion**: The current **waste diversion rate is only 8%**, significantly below the **80% target** set by the NSW EPA for 2030.

The primary **Strategic Priorities & Key Actions** developed because of the analysis undertaken are as follows:

1. **Improving Waste Diversion & Resource Recovery**

    - Conduct **waste composition audits** to establish accurate baseline data for planning.
    - Carry out a BSC wide **community survey** to better understand community attitudes to more services and participation currently and in the future towards home composting activities.
    - Explore **FOGO alternatives**, including subsidized home composting, due to financial and logistical challenges with kerbside organics collection.
    - Investigate the feasibility of **public place recycling bins** to increase community participation in recycling.
    - Expand the RAMJO **regional collaboration** approach for existing and future waste management and processing facilities.

2. **Enhancing Waste Service Efficiency & Data Collection**

    - Implement **accurate landfill data tracking** for recording waste movements.
    - Conduct a **landfill operations review** to assess cost efficiencies, equipment needs, and long-term viability of the **Euston and Balranald Landfills**.

- Ensure **kerbside collection efficiency** by considering truck capacity, route optimization, and dual-compartment trucks for future FOGO or recycling services.

3. **Financial & Regulatory Planning**

- Review **landfill fees & charges** to ensure they reflect operational costs and encourage responsible waste disposal and recycling.
- Assess **Euston Landfill's continuing operational viability**, particularly in addressing the **cross-border waste issues** associated with Victorian waste streams.
- Seek **exemptions from state-mandated FOGO services** due to rural logistics and financial constraints.

Implementation & Next Steps

BSC will prioritize **low-cost, high-impact actions** to enhance waste management while working within financial limitations. The strategy outlines a **data-driven, financially sustainable** approach, while balancing **community needs, environmental goals, and regulatory compliance**.

A **review of the strategy** is recommended **after approximately 12 months** following BSC obtaining the recommended data, research and other details that will support further strategic decision-making that is tailored to BCC's needs. After this initial review, a **five-year review cycle** is recommended to adjust to emerging waste challenges and legislative changes.

This strategy provides a **realistic roadmap** for achieving **more efficient, cost-effective, and environmentally responsible waste management** over the next decade.

2. RECOMMENDATIONS

The BSC Waste Management Strategy project arrived at a number of key recommendations to assist in guiding the practices of waste management within the shire over the coming 10 years. The following table provides a summary of those key recommendations arrived at within the body of this document. The prioritisation levels of High, Medium or Low priority are generally based on the following timeframes:

- High priority: 0-3 years
- Medium priority: 4- 6 years
- Low priority: 7-10 years

No.	Recommendation	Cost Implication	Priority
Balranald Landfill			
1	**Data collection** – obtain/track data for all waste and recyclables received, and for all revenue and costs activities.	On site recording of data, incremental increase labour costs $2,000	High
2	**Landfill operations review** – Review landfill operations (i.e., how compaction and cover is delivered etc.) and equipment (i.e., landfill compactor, bulldozer, front-end loader, excavator etc.) required to identify efficiency and cost saving opportunities.	$3,000	High
Euston Landfill			
3	**Data collection** – Undertake a detailed data collection and contract review process to ensure Council is prepared for the future re-tendering of operations, or to ensure sufficient information is in place to enable internal management.	$4,000	High
4	**Future operation business case** – Review the overall level of value that the Euston Landfill provides to BSC residents to support a business case for the future operation of the site, or otherwise. Consideration should be given to operational costs, revenue potential, on-going liability, potential closure costs, future industry and other developments, on-going management requirements, etc.	$6,000	High
Landfills - general			
5	Investigate the feasibility of establishing a community recycling centre (CRC) for household problem wastes at either landfill.	$3,000	Medium

No.	Recommendation	Cost Implication	Priority
Kerbside collection / FOGO			
6	**Bin contents** – Conduct a waste composition audit for current kerbside residential waste collected in Balranald and Euston. A second audit of commercial bins is recommended but not critical.	$3,000	High
7	**Commercial FOGO** – Establish suitable charge rates for commercial FOGO collection if Council is required to provide this extra service.	$2,000	High
8	**Residential FOGO waste** – Investigate FOGO options more fully including but not limited to; home composting, sewer disposal, opt in with extra charge, community bins, free green and organics disposal at Balranald landfill. Home composting and sewer disposal are the most economical options.	$10,000	Medium
Data capture requirements			
9	**Residential waste volumes data** – Obtain Balranald and Euston Rubbish Truck weights over the course of a full calendar year (no less than 2 truck weights per season to enable seasonal variance to be understood) to obtain accurate data on the amount of residential waste going to landfill and to enable future planning for the landfills and other waste management requirements.	<$1,000	High
Fees & Charges			
10	**Fees and Charges** – Review Councils Waste Fees and Charges schedule and consider increasing waste disposal fees to current and future potential customers for identified waste streams to enhance cost recovery to reach at least break even, including rehabilitation provision.	$3,000	High
11	**FOGO processing options** – investigate the options available to BSC to develop a thorough business case on its potential viability considering disposal and processing locations, disposal rates and transport costs, etc. Seek assistance from RAMJO in the development of the business case to ensure it includes regional opportunities. Seek assistance from LGNSW to lobby for a FOGO exemption.	$6,000	Medium

No.	Recommendation	Cost Implication	Priority
Overarching Strategic review analysis			
12	**Strategic direction setting** – following BSC obtaining all the high priority data elements noted in the above recommendation items, review the available options and refine the preferred way forward (preferably within a 12-month period). This is to include modifying the Waste Management Strategy to reflect Councils agreed position based upon the further information and research.	$3,000	High

Table 1: Recommendation Summary

3. INTRODUCTION

3.1 Purpose and Scope

The purpose of the development of the Waste Management Strategy (the Strategy) is to ensure the long-term sustainability of BSC waste management through improved environmental practice, whilst achieving financial and legislative target requirements. Additionally, Council is seeking to improve the landfill operations through waste initiatives in line with NSW State and Regional Targets.

Based upon the above desired purpose of the project from BSC, CT Management Group developed a suitable methodology to achieve the preferred outcomes. Each stage contained technical and human resources input that were used to formulate the findings in this strategy. The following staged approach to the delivery of the project is outlined, noting that further details on the methodology employed are located in **Appendix 1**.

- Stage 1: Project Inception
- Stage 2: Background Review and Information gathering
- Stage 3: Public consultation: Round 1
- Stage 4: Draft Waste Management Strategy development
- Stage 5: Public consultation: Round 2
- Stage 6: Final Waste Management Strategy

3.2 Waste Management Context

The Local Government Act 1993 requires all councils in NSW to provide a residential waste collection service. In addition to providing residential services, BSC also provides services to commercial properties.

The NSW Parliament, after much consultation, announced on February 28th 2025 legislation to mandate food organics and garden organics (FOGO) recycling for households and businesses. This will mean NSW will be the first state in Australia to do so.

Food organics and garden organics (FOGO) recycling will now be mandatory for households by July 2030, and for businesses and institutions in stages from July 2026.

It is important to note that Councils have the opportunity to seek exemption from these mandatory requirements. This is particularly relevant to BSC given the logistical and operational challenges and expenses that they would face under implementation of FOGO, and which are detailed further in this document.

COUNCIL FOGO EXEMPTION DETAILS

- Exemptions are intended to be predominately proactive where the EPA considers them necessary to limit the number of organisations needing to approach the EPA.
- Recognise that while the NSW Government wants all businesses and councils to meet the mandates, in some situations there may be more time needed e.g. when a council's waste contract runs beyond 2030.
- The EPA will develop an exemption framework to guide decision making.
- As part of the exemption process some of the things considered will be:
    - Geographical and population constraints and the impact on processing availability
    - Availability of infrastructure

- Timing and expiration of waste contracts
- Infrastructure impairments of certain building types (i.e. multi-unit dwellings or MUDS)

- ***State Government media release 28th February 2025 excerpt; "One of the guiding principles is that we do not wish to punish anyone where access to a FOGO service is limited or cost prohibitive".***

Council owns the Balranald and Euston landfills. Council operates the Balranald landfill via dedicated Council officers and operates the Euston landfill via a contractor – Robinvale Waste. Both sites include small vehicle drop-off areas and locations within the sites for the recycling of various materials (i.e., metal, cardboard, oils, drum muster, etc.).

Like many communities across Australia, Council is seeking to deliver a scope and breadth of service that meets local needs and achieves agreed targets. Changes in policy nationally and internationally affect Council from time to time, as does changing community expectations for Council to manage waste in a more sustainable way.

Traditionally, delivering waste management and resource recovery services in rural and remote councils of Australia is difficult due to small rate revenue bases and large geographical areas. The tyranny of distance and diversity in operational scale amongst rural New South Wales (NSW) Councils equates to many waste related projects being unaffordable and thus not feasible.

Council recognises the importance of sustainable (both environmental and financial sustainability) waste management services for its communities and the requirement to have a clear plan for the future. Therefore, this Waste Management Strategy has been prepared to identify further opportunities for improvement, whilst considering the specific challenges faced by rural communities and already stretched budgets in delivering changes required under legislation.

The Strategy was developed to align as closely as possible with the NSW Waste and Sustainable Materials Strategy as well as the RAMJO Regional Waste and Resource Recovery Strategy.

The Riverina and Murry Joint Organisation (RAMJO) is a voluntary Local Government group comprised of two large sub-regional areas namely, the Riverina and Murry Waste Groups. These two groups are separately funded; however, both operate under the RAMJO banner. Balranald Shire Council is an associate member of RAMJO.

The RAMJO strategy template reflects the "bigger" picture required to reduce waste to landfill, however the circumstances in BSC do not allow for the implementation of certain initiatives and/or directives especially considering BSC budget constraints.

The Strategy is required to detail the roadmap for how BSC will achieve its agreed objectives in relation to the management of waste.

Strategic waste planning is a dynamic process, and this Strategy should be reviewed every five years to ensure it is current and aligns with industry developments.

Although not a common strategy, in unusual circumstances a strategy can be as simple as "BUSINESS AS USUAL".

In the case of BSC, with a population density of 0.1 persons per square kilometre over 21,346 square kilometres, the costs of reducing waste to landfill or improving recycling is not offset by any savings and is therefore a direct cost increase on Councils budget.

ACTION PLAN

The following list is a brief summary Action Plan suggested for BSC waste management. The Action Plan will require approvals and most importantly a budget allocation and timeline. The detailed Action Plan is available in Section 8 of this document.

The waste volumes generated in BSC from residential sources is estimated at less than 1,000 tonnes per annum, and available landfill space is forecast to be up to 90 years at Balranald Landfill and up to 16 years at Euston Landfill.

The single bin collection service in place during 2025 meets the need for regular waste collection, however it does not allow for the separation of recyclables and food/green organics. This additional separation is viewed as more environmentally sustainable, however the limiting factors for remote and rural Councils is the cost of collections and the availability of processing facilities for the separated materials within a reasonable distance.

It is very clear that small rural Councils with a constrained revenue base that must cover many services are limited to how much they can allocate to waste and recycling activities. Accordingly, the Action Plan items for BSC are intended to be low cost and can be carried out using mainly Council resources if capacity is present.

The priority is data collection and community attitude to change. This knowledge will drive future waste and recycling activities. The primary Action Plan items are as follows:

ACTIONS

1. *Waste composition audit – conduct and analyse the results.*
2. *Survey community to determine waste management preferences and desire to pay – services, home composting etc.*
3. *Landfill data – obtain and analyse.*
4. *RAMJO – develop collaborative contracts, and other local services.*
5. *LGNSW – lobby to seek FOGO and other exemptions, with BSC and RAMJO support.*

ASSUMPTIONS

The following assumptions are key elements to keep in mind when reading the Strategy, and have influenced the analysis and subsequent recommendations provided:

- 839 households serviced by BSC residential waste collection.
- Tonnage quoted are based on landfill reports to the EPA NSW.
- Separate FOGO collection tonnage is estimated at 400 tonnes per annum, based on other Councils data.
- A separate FOGO bin collection service cost per annum estimated at $200,000 for weekly collection and $30,000 for an alternating fortnightly collection.
- Food/green waste disposal at other locations outside of the BSC area will cost in excess of $300.00 per tonne.
- The number of bins required for a best practice full-service collection is generally considered to be 3 bins – separate general waste, recyclable waste and green waste. The collection frequency for these bins is every two weeks for general waste and recyclable waste, and every week for food and green waste.

  This bin system and collection frequency appears to be beyond the capacity for BSC to provide.

  Additionally, the disposal costs and distances to processing facilities for recyclables and FOGO is prohibitive.
- An alternative FOGO disposal option from the household through the sewer system might require sewer system upgrade works by BSC and could have substantial capital costs. Some commercial sector clients (e.g. Hospital) might already have this in place.

3.3 Strategy Review Cycle

It is recommended that this Strategy be reviewed every five years or as required in the event of legislative changes.

The Strategy may also be changed because of other amendments that are to the advantage of Council.

Any amendment to the Strategy must be by way of a Council Resolution or the approval of the General Manager.

3.4 Strategy Acknowledgement

BSC wish to acknowledge that the following strategy has been developed using the Riverina & Murray Joint Organisation (RAMJO) template as a guide to the format and content.

PART B – KEY DRIVERS

The following sub-sections provide pertinent background information on the status of waste management in BSC at the time of development (March 2025). It also notes the legislative and other environmental influences present that have the potential to impact on the direction that the strategy for waste takes in the short, medium and long-term.

Further background and contextual details are contained in **Appendix 2**.

4. OVERVIEW – THE CHALLENGES AND OPPORTUNITIES

BSC has a solid waste management foundation from an infrastructure perspective that can be improved through the sequential implementation of numerous strategic initiatives. The current challenge is to ensure that Councils decision-making process is informed by robust data that will enable a sound long-term way forward.

Building on the foundations of the BSC waste system with new approaches, views and principles that avoid, reuse, recycle or recover resources from waste will assist Council to deliver improvements across the various waste management functions.

4.1 Community aspirations

The development of the Waste Management Strategy was adopted as an important community priority in the BSC Community Strategic Plan 2032, as noted in Section 5. Our Environment. Within this section, and the accompanying sub-section Future Directions, item 5.3 Manage our waste sustainably noted the following strategy and measures recommended:

Strategies	Measures
• Work with regional partners to develop and implement a Waste Management Strategy	• Progress on the Waste Management Strategy

As part of the development of the Waste Management Strategy, community input was sought on two occasions;

1. During the preliminary development stage to obtain community views on waste management in the region (late November 2024), and:
2. During the public exhibition stage for the Draft Waste Management Strategy (late-March/early April 2025).

The level of community input received during the first input opportunity (late November 2024) was minimal and thus not representative of the broader community. Thus, it resulted in Council obtaining limited information on what the community wanted to see occur in the waste management space.

The key points raised during this phase by the community included:

- Green waste recycling needed
- Tip shop – used to have one, would like the opportunity to repurpose waste
- Rate structure – some ratepayers already struggling through cost of living
- Cardboard recycling is occurring
- Waste is an important community service
- Food waste is going direct to the landfill
- Would like a hard rubbish collection service to occur frequently

The above comments highlighted the need for a more comprehensive survey of the community to determine the priority with which the community views the needs and desires in the waste management realm.

Refer to **Appendix 3** for a more detailed account of the community input received.

Subsequently, the level of community input received during the public exhibition of the Draft Waste Management Strategy (During March/April 2025) was ….. *Note: This section will be updated once the second of community consultation has been conducted and community feedback is received following the exhibition of the Draft Strategy.*

Refer to **Appendix 3** for a more detailed account of the community input received.

4.2 Legislative and Regulatory Context

The following is a brief synopsis of the legislative and regulatory context within which BSC are required to provide waste management services to the community.

Waste policies are ever evolving and adapt to reflect the changing industry. The legislative context for Waste Management is complex, with various Government Authorities having a say in waste management and recycling, at the same time trying to direct certain activities through mandates and in some cases penalties for non-compliance.

The reality and difficulty are that one size does not fit all, with Council areas and populations in NSW varying from 0.1 person per square kilometre in Balranald to 8,300 persons per square kilometre in Sydney. This has major financial implications for smaller regional Councils with a very small rate base spread over relatively large areas.

Local government operates within the state context to provide on-the-ground operations and waste services to the community. Waste management services are one of the most significant financial commitments Councils make on behalf of the community. Council must ensure that these services are fit for purpose and offer the ratepayer value for money.

The Strategy draws on State and Federal based legislative, policy, strategy, educational and economic tools relating to waste management in NSW. The key legislation and regulations drawn upon to guide the development of the Strategy include, but are not limited to the following:

- Protection of the Environment Operations (POEO) Act 1997
- Waste Avoidance and Resource Recovery (WARR) Act 2001
- Protection of the Environment Operations (Waste) Regulation 2017
- Product Stewardship Act 2011

It is noted that the Product Stewardship Act 2011 is a key piece of legislation that seeks to help reduce waste and prevent harmful materials from ending up in landfill by increasing recycling and the recovery of valuable materials from products. It places the onus on all levels of government, industry and the community to have a shared responsibility for the impacts of products manufactured, consumed and disposed of. To this end, the Strategy has been developed keeping in mind the need for there to be a level of shared responsibility when it comes to the key actions of; reduce, reuse, recycle, recover. The burden of responsibility and cost is not simply for BSC to carry or absorb alone.

These key regulatory documents describe the requirements for transporting, storing, processing, managing, recovering, and disposing of waste and recyclable material. Further details on the above documents and the key entities that BSC work with in the waste management space are provided in **Appendix 2.**

The following table provides a summary view of the hierarchy of responsibility for waste management that BSC operates within.

Government level	Responsibility
Commonwealth	• National Waste Policy 2018 • National Packaging Covenant • National Packaging Targets • National Food Waste Strategy • National Television and Computer Recycling Scheme
State	• Protection of the Environment Operations (POEO) Act 1997 and Waste Regulation 2015 • NSW Waste Avoidance and Resource Recovery (WARR) Strategy and 2020-21 targets • NSW 20 Year Waste Strategy 2020 (currently in development) • Energy from Waste Policy Statement • NSW Circular Economy Policy Statement • Return and Earn Container Deposit Scheme (CDS)
Regional	• Local governments may join a Regional Organisation of Councils (ROCs) or non-urban Voluntary Waste Management Groups (VWMGs) • BSC is an associate member of the Riverina & Murray Joint Organisation (RAMJO) in waste management and resource recovery section.
Local	• Local government provides waste education to the community to inform waste behaviours and ensure residents know how to use the waste systems provided • Councils are responsible for collection, treatment and disposal of municipal waste (through in-house operations or contracted services), including kerbside, council generated and illegally dumped or littered waste. • Councils are encouraged to meet state targets (with some state funding for waste programs), however each councils' appetite to meet these targets is usually a function of their politics and priorities and the available infrastructure and services • BSC Community Strategic Plan (CSP) 2032 - 5.3 Manage our waste sustainably (Work with regional partners to develop and implement a Waste Management Strategy).

Table 2: The hierarchy of responsibility for waste management

4.3 Waste Hierarchy

The waste hierarchy is the core guide used globally to prioritise approaches to waste management based on environmental impacts and sustainability (see Figure 1). The hierarchy is the core conceptual framework behind the NSW WARR Strategy and helps to inform this Strategy. It

recognises the benefits across the supply chain of avoiding consumption and reuse, the materials benefits in recycling waste back into new products and the energy value when all other recovery is exhausted.

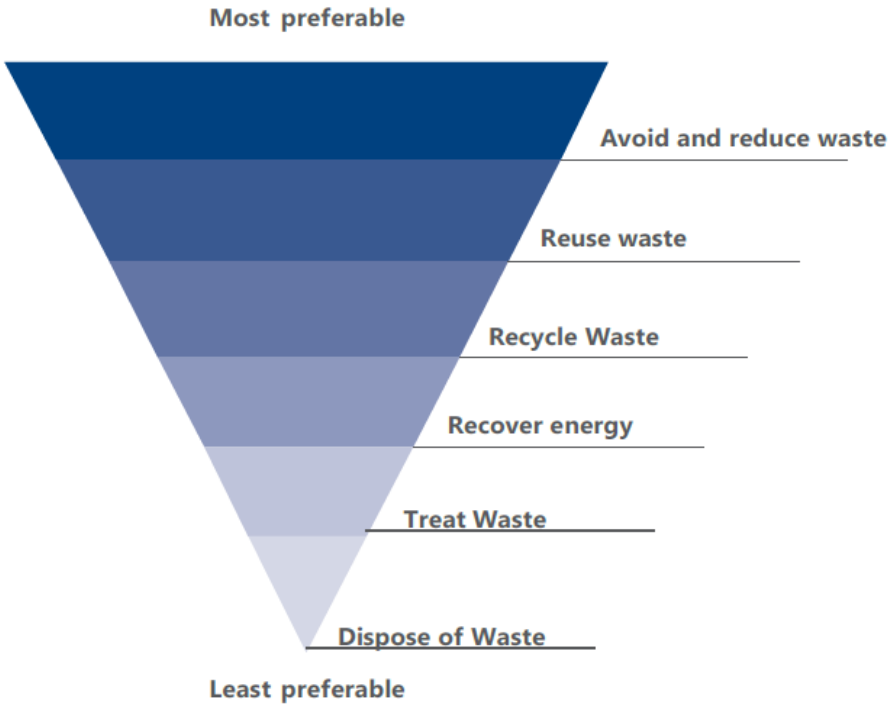


Figure 1: The waste hierarchy guides preferred outcomes

Typically, local governments have more control over the lower portion of the waste hierarchy as the responsible entity for providing waste collection, processing and disposal services for municipal waste. However, councils are starting to consider how they can address the higher order options in response to the emerging challenges in managing waste. As a result, the first objective within this Strategy is to drive waste avoidance.

4.4 Circular Economy

Recognition of the need for a less linear approach to materials flowing through the economy has led to development of the circular economy model, which aligns with the waste hierarchy but seeks to present a more active indication of pathways and priorities (see Figure 2).

To establish a more self-sustaining circular economy, all aspects of the economy need to be considered, from the extraction of resources, to design and manufacturing all the way through to the consumers who use these products and end of life management

The concept is based on seven principles outlined in the NSW Circular Economy Policy Statement;

1. Sustainable management of all resources
2. Valuing resource productivity
3. Design out waste and pollution
4. Maintain the value of products and materials
5. Innovate new solutions for resource efficiency
6. Create new circular economy jobs
7. Foster behaviour change through education and engagement.

In general, the earlier in the circle the more effective the intervention, with 90% of the lifecycle impact of many products determined at the design stage.

While Council has limited influence on how products are designed and manufactured, it has a key role in providing the capability to reuse or recycle materials and keep them 'circulating' in the productive economy for as long as possible.

Practical examples of initiatives at each stage of the circle are outlined below:

- Manufacturers use recycled materials in their processes and design products for disassembly to further promote product repair and material recycling, extending their lifetimes.
- Retailers advocate for, and are open to, new business models, whether selling second hand and refashioned items or selling a service rather than the product.
- Consumers, including businesses and Council, consider sustainability in their procurement and for unwanted items pursue the highest feasible outcomes in the waste hierarchy.
- Council prioritises resource and energy recovery through the waste services it contracts on behalf of the community.

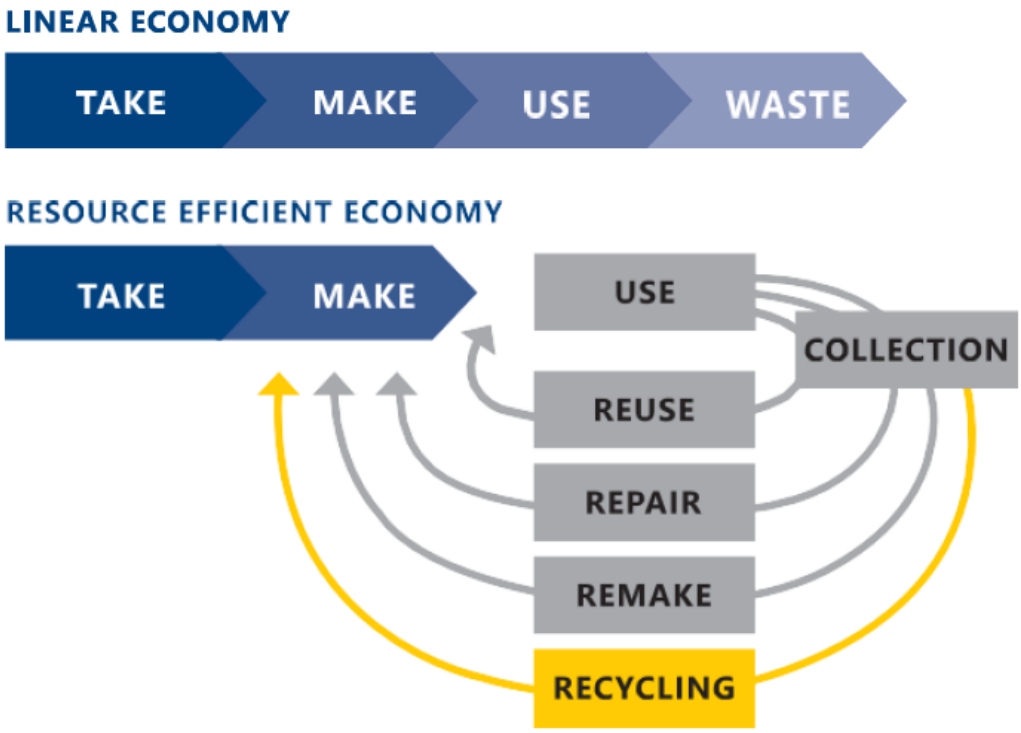


Figure 2: A circular economy retains materials in their highest productive use.

As noted earlier in Section 4.2, the function of product stewardship underpins the circular economy movement given its' focus on activities such as recycling to help reduce the amount of waste going to landfill, increasing recycling rates, recovering valuable resources that can be used to make new products and preventing harmful substances found in certain products from getting into the environment.

The Product Stewardship Act paves the way for any number of product stewardship activities and schemes to be set up, as well as for existing schemes and projects to be accredited. The many activities likely to be carried out under this legislation will help reduce waste and recover valuable resources in a safe and environmentally responsible way. See **Appendix 2** for further details.

PART C – WHERE ARE WE NOW?

5. BALRANALD SHIRE PROFILE

The BSC local government area is approximately 21,346 km2 in size and consists of an estimated total population of 2,208 (2021 Census data, Australian Bureau of Statistics).

The two major townships in the Shire are:

- Balranald (population 1,200)
- Euston (population 600)

The main industry in the area is farming; grains, sheep, cattle and grapes. However primary production is diversifying to encompass horticulture, viticulture, organic agriculture and the growing of fruit and nut trees. Tourism is also recognised as an important economic driver.

The current housing stock comprises of approximately 864 residential dwelling.

According to the BSC Settlement Strategy (adopted July 2023), the 2019 Population Projections by the NSW Department of Planning, Industry & Environment (DPIE) suggest that the LGA is projected to increase its population at an average annual growth rate of 1.2% over 2016-2041. Given the age of this projection and anecdotal evidence from Council officers, it is suggested that BSC's population has not experienced the forecast growth rate of 1.2%, and that it may be more prudent to plan for future service provision on a more conservative basis.

	2016-2021	2021-2026	2026-2031	2031-2036	2036-2041	2016-2041 (25 Years)
Population Change	100	100	200	200	250	**850**
Av. Annual Growth Rate	0.80%	0.80%	1.50%	1.40%	1.60%	**1.20%**
Births	200	200	200	200	250	**1050**
Deaths	100	100	100	150	150	**600**
Natural Change	100	100	100	50	100	**450**
Net Migration	0	0	100	100	100	**300**

Table 3: NSW Government (2019) population projections for Balranald Shire 2016-2041.

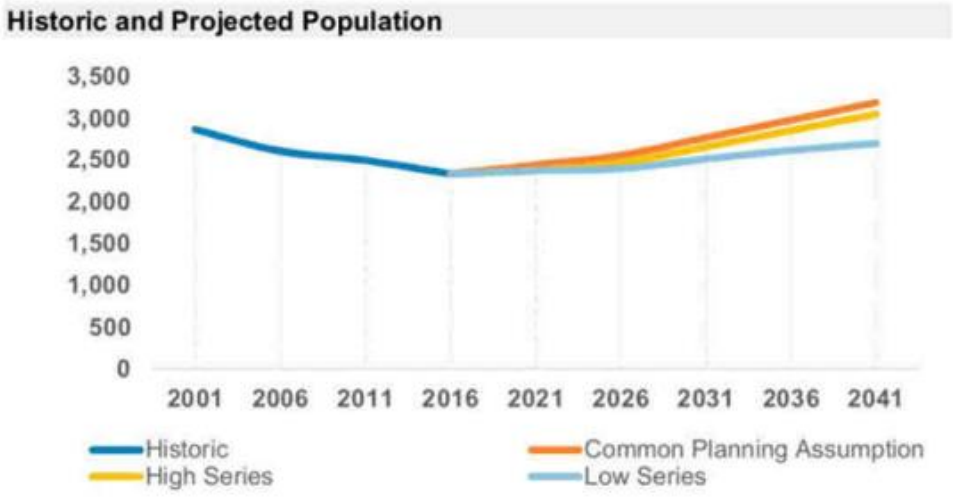


Figure 3: NSW Government (2019) population projections for Balranald Shire 2016-2041.

Given the above commentary, is not anticipated that BSC will experience significant or even moderate population growth in the next 10 years. On this basis, many of the recommendations and actions contained in the Strategy will be conservative in nature and not seek to expand or radically modify Council's waste management practices unless there is solid justification and need to do so.

Balranald Shire is an associate member of RAMJO. Overall, the RAMJO region has an area of 126,595 km2 with a population of 168,643.

The above demographic information is important to note and understand in the context of many of the recent resource recovery policy positions released by the NSW State Government and others. Many of the recent mandates for FOGO and other waste initiatives are based upon:

- higher population density within a geographic region.
- manageable distances to material processing facilities and service providers (thus greatly reduced logistical imposts).
- population-base numbers that provide economies of scale.

The impact of BSC's demographic reality, isolation and associated logistical challenges are explored further in Section 7 later in this document.

5.1 BSC – Current Waste Management Services

Council currently provides the following waste management services and programs to its community:

- Kerbside waste collection through:
    - Weekly collection of one (1) 240L red-lidded general waste bin for residential residual waste and recyclables combined.
    - Weekly collection of one (1) 240L red-lidded general waste bin for commercial residual waste and recyclables combined.
- Waste disposal and resource recovery at the Balranald and Euston Landfills and small vehicles drop off areas.
- Public place litter management.
- Support for a Return and Earn in Balranald at a local café.
- Illegal dumping management and compliance.

5.1.1 Household and Commercial Waste Collection

Collection of waste from households is a core local government responsibility. Waste collection contracts are often long-term commitments due to the significant investment by the contractor in vehicles, facilities and staff.

Currently, BSC's waste collection services are delivered by a private contractor, BDS Automotive, as follows:

- **Balranald waste collection –** kerbside waste collection:
    - Monday - Kerbside collection of residential 240L red-lidded general waste bin containing a mix of residual waste and recyclables from 5am to 2pm.
        - 2.5 loads are taken to Balranald landfill each Monday from the residential kerbside collection.
        - The landfill report shows 4.48 tonnes per load are disposed at the landfill.
    - Friday - Balranald main street commercial and litter bins collected from about 5 a.m.

- **Euston waste collection** – kerbside waste collection:
    - Friday - Kerbside collection of residential 240L red-lidded general waste bin containing a mix of residual waste and recyclables from approximately 10am onwards.
        - 1 load of waste is deposited at Euston landfill, with the truck returning to Balranald at about 2 p.m.

Permissible and non-permissible items for disposal in the BSC Residential waste bins for kerbside collection are as follows:

Permissible disposal items	Non-permissible disposal items
• Plastic packaging • Disposable nappies • Crockery, pyrex and glassware • Foam meat and food trays • Bubble wrap and plastic strapping • Old, clothes, toys, rags and linen • Rope and hoses • General waste	• Building materials (i.e., concrete, rocks, clay, bricks, soil, etc.) and asbestos • Fire extinguishers and gas bottles • Hazardous materials, chemicals and sharps • Fluorescent globes and tubes • Chemicals • Paints, petrol solvent and oils • Household and car batteries • Tree stumps or limbs • Hot ashes

Table 4: Residential kerbside bin waste disposal items – permissible and non-permissible

Council does not provide a kerbside recycling service currently and there are no provisions for the acceptance of household recyclables at both waste facility. However, there is a "return and earn" outlet for drink containers at the Balranald Takeaway on Market Street.

Figure 4: Photo of Balranald Return and Earn location.

5.1.2 Landfills and Transfer Stations

BSC is well supplied with household waste and recycling infrastructure. Council operates two large waste management facilities across the local government area to cater for household and commercial waste. The Balranald and Euston Landfills/Transfer Stations are open as follows:

Balranald Landfill	Euston Landfill
Monday: Closed	Monday: Closed
Tuesday: Open 4-6pm	Tuesday: Open 1-6pm
Wednesday: Closed	Wednesday: Closed
Thursday: 4-6pm	Thursday: 1-6pm

Balranald Landfill	Euston Landfill
Friday: Closed	Friday: Closed
Saturday: 10am-1pm	Saturday: Closed
Sunday: 10am-3pm	Sunday: 9am-3pm
Note: Hours of operation may change if weather causes the landfills to become wet and slippery and too dangerous for public access.	

Table 5: Landfills operating days/times

Both landfills/transfer stations accept the following types of waste/have separation of waste into the following to enable processing and/or recycling to occur:

- Mixed waste (general household materials) to the landfill pit.
- Green waste (free disposal for residents) to a stockpile for shredding.
- Plastic bottles and Aluminium cans (free disposal for residents) at receptacles provided at the entrance, for future recycling.
- Metals – to a stockpile for future recycling.
- Building materials – to a stockpile for future processing.
- Electronic waste and white goods – to a stockpile for future recycling.

The following tables provide an overview of the pertinent details for both BSC Landfills.

Balranald Landfill	
Type of Facility	Integrated Waste Management Facility encompassing: • Mixed waste (general household materials) to the landfill pit. • Green waste (free disposal for residents) to a stockpile for shredding. • Plastic bottles and Aluminium cans (free disposal for residents) at receptacles provided at the entrance, for future recycling. • Metals – to a stockpile for future recycling. • Building materials – to a stockpile for future processing. • Electronic waste and white goods – to a stockpile for future recycling. • Drop-off facility for batteries, motor oil, tyres and other specific types of waste • Biosolids processing from the BSC sewage treatment plant
Capacity	Licenced to receive 5,000 tonnes per annum.
Primary wastes accepted	• Putrescible waste • Non-putrescible waste • Asbestos • Tyres
Primary direct users	Residents and businesses in the eastern part of the LGA.
Remaining life	Approximately 34 years in the current operational area (at current disposal rates), with the potential for further expansion within the site possibly up to 90 years with overtopping.
Opportunities for future development	Approved landfill capacity extension and resource recovery expansion potential.

Table 6: Balranald Landfill/Transfer Station site details

Euston Landfill	
Type of Facility	Integrated Waste Management Facility encompassing: • Mixed waste (general household materials) to the landfill pit. • Green waste (free disposal for residents) to a stockpile for shredding. • Plastic bottles and Aluminium cans (free disposal for residents) at receptacles provided at the entrance, for future recycling. • Metals – to a stockpile for future recycling. • Building materials – to a stockpile for future processing. • Electronic waste and white goods – to a stockpile for future recycling. • Drop-off facility for batteries, motor oil, tyres and other specific types of waste
Capacity	Licenced to receive 5,000 tonnes per annum.
Primary wastes accepted	• Putrescible waste • Non-putrescible waste • Asbestos • Tyres
Remaining life	Residents and businesses in the eastern part of the LGA
Opportunities for future development	Approximately 11 years with a further 5 years with expansion to the North, a total of 16 years (at current disposal rates), with the potential for further expansion within the site.

Table 7: Euston Landfill/Transfer Station site details

5.1.2.1 Landfill Plans

Both the Balranald and Euston landfill sites have comprehensive Long-Term Plans of Management (LTPoM's) for the landfill operations. These documents prepared by Robert Bailey Consulting note/outline the following key elements:

- Long term planning and future design
- Activity areas and interrelationships
- Application of fees and charges
- Complying with the EPA Environment Guidelines: Solid Waste Landfills (2nd edition 2016)

The LTPoM's cover operational and compliance areas but there is no discussion on the long-term benefits or risks to BSC of operating one or both landfills. Quite simply, if there is no financial advantage but on-going or increased risk to Council, then a review of the landfill operations at Euston must be carried out. This item is discussed further in Section 7.2.1.1.

The Balranald landfill has a forecast life of 34 years over the "preparation areas" and possibly up to 90 years with overtopping.

Euston landfill has 11 years with a further 5 years with expansion to the North, a total of 16 years.

The above estimates are based on BSC's current landfill operations activities and forecasting that a larger proportion of waste will be received from outside the Shire.

At the time of writing this strategy, a large amount of waste was being transported from the Swan Hill local government area in Victoria by Robinvale Waste into the Euston landfill. This cross-border movement of waste may be occurring due to the Victorian landfill levy surcharge being in place for Victorian landfills, and the corresponding increased disposal charges.

The details associated with the above activities, the Robinvale Waste arrangement, and the costs associated with its continuation and/or modification are of a confidential contractual nature. They are broadly covered from a solutions perspective in the next section of the report.

5.1.2.2 Landfill Operating costs

The operating costs of the landfills came to a total of approximately $250,000 per annum in 2023/24.

If BSC extrapolates the above cost out on a per tonne basis, then the $250,000 per annum cost equates to an operating cost of approximately $200 per tonne. It should be noted that this figure is skewed as Euston's tonnages are processed at no charge, as RW operate the landfill at no cost to BSC. Taking out the Euston tonnages received, the per tonne operating cost for Balranald alone, increases sharply to a rate of appropriately $283 per tonne.

The following tables provides a summary view of the financial performance of BSC waste management across the primary areas of operation.

	2022/23 Actuals	
	Income	**Expenditure**
Domestic Waste Management	$422,959	$488,857
Operational Surplus / Deficit	**$65,898**	
Street Cleaning expenditure	$0	$35,549
Operational Surplus / Deficit	**$35,549**	
Commercial Waste	$84,785	$35,592
Operational Surplus / Deficit	**$49,193**	
TOTAL Operational Budget Surplus / Deficit	**$52,254**	

Table 8: BSC Waste Management operations financial performance 2022/23.

5.1.3 Waste and recycling performance

Based on BSC's Annual Waste Reports to EPA NSW, in 2023/24 a total of less than 7,000 tonnes of waste entered Council's waste management system. This included material collected at the kerbside and material received and managed at the Balranald and Euston Landfills & Transfer Stations.

The sources of these materials are detailed in the following tables which include municipal waste, commercial and industrial (C&I) waste and construction and demolition (C&D) waste.

Table 9: BSC Sources of waste (total)

	Tonnes Received	Tonnes Landfilled	Tonnes Recovered	Recovery Rate
Municipal	730	730	0	0%
C&I	3,816	3,311	0	0%
C&D	1,856	1,374	509	27%
Total	**6,402**	**5,415**	**509**	**8%**

The sources of the above materials are detailed in following tables.

Table 10: Source of waste received at Balranald Landfill & Transfer Station

Balranald Landfill & Transfer Station	Tonnes Received	Tonnes Landfilled	Tonnes Recovered	Recovery Rate
Municipal Kerbside Residual Waste	582	582	0	0%
Municipal Kerbside Drop off	Unknown			%
Dropoff	Unknown			%
C&I	505	505	0	0%
C&D	0	0	0	%
Total	**1,087**	**1,087**	**0.00**	**0%**

Euston Landfill & Transfer Station	Tonnes Received	Tonnes Landfilled	Tonnes Recovered	Recovery Rate
Municipal Kerbside Residual Waste	148	148	0.00	0%
Municipal Kerbside Drop off	Unknown		0.00	%
Dropoff	Unknown			%
C&I	3,311	3,311	0.00	0%
C&D	1,856	1,374	509	27%
Total	**5,315**	**4,833**	**509**	**10%**

Waste from C&I sources is the primary waste stream received at the two Landfills & Transfer Station [60%] followed by C&D sources [29%] and municipal sources [11%].

> ***Note:*** *The accuracy of the data is uncertain as there are no weighbridges at either landfill. The collection of kerbside waste results in 3.5 loads per week to the landfills, and this equates to an estimated 4 tonnes per load average.*
>
> *The split is estimated as follows:*
> - *Balranald at 4.48 tonnes per load*
> - *Euston at 2.84 tonnes per load.*
>
> *These weights are well below expected average weights per garbage truck load, which are generally measured at 6 to 7 tonnes per load. This current total further equates to about 15kgs per 240 litre bin emptied, again on the low side for a one bin collection once per week.*
>
> *Based on the recent weighing of a truck in Balranald showing XX tonnes (note: this information will added prior to finalisation of the document), it is paramount that more accurate data is obtained.*

Further to the above, it is reiterated that at the time of development of this Strategy, BSC had a limited dataset for waste management operations. To enable reasonable levels of analysis of waste flows across all areas of operation/waste streams it is important to have relatively thorough and robust data for waste operations.

The above can't be overstated given the regulatory reporting requirements associated with the waste function, and the need to utilise various datasets to then make informed decisions on future operations, many of which have significant expenditure levels tied to them.

Further discussion on the types of data that BSC should collect in the future to enhance waste management practices is contained in Section 7.

5.1.4 Fees and Charges

BSC operates both Balranald and Euston landfill under a mixed token system/payment system in accordance with Councils annually adopted Fees and Charges. One token costs $16.00 to purchase.

The following table provides a snapshot of the primary fee types in place at the landfills.

Service	Unit	Fee (inc. GST)
One axle trailer or utility general waste)	pcs	1 Token
Two axle trailer (general waste)	Two axle trailer (general waste)	2 Tokens
Car tyre – (2 tyres)	pcs	1 token per 2 tyres
Truck or large machinery tyre	pcs	3 tokens per tyre
Mattress – Single		1 Token
Mattress – Double		2 Tokens
Mixed Waste Material – Non-compactable (eg White Goods, furniture) per tonne 3		$160.00
Asbestos	m3	$260.00 per cubic metre plus burial fee
DrumMuster containers		Free – by appointment only
Green waste non-contaminated		Free
Illegal dumping	tonne	$160 plus 125% of Clean Up costs
Out of Hours Entry to Balranald Tip		$270

Figure 5: BSC – Waste services primary fees

PART D – RESOURCE RECOVERY OPPORTUNITIES

6. BALRANALD SHIRE RESOURCE RECOVERY OPPORTUNITIES

Based upon the previously noted profile details for BSC, which are generally captured in the following four dot points, this section discusses the ways in which BSC can enhance resource recovery opportunities in a manner that is commensurate with BSC's unique position and in alignment with Councils financial and human resources constraints.

- only moderate population growth likely in the next 10-years
- estimated remaining useful life for the landfills
- the need for more robust waste data to be collected
- the need to explore resource recovery opportunities generally to divert waste from the landfill

7. LOGISTICAL CONSTRAINTS

7.1 Neighbouring landfills

Given BSC's geographic position in south-western NSW and relative isolation from other towns and major centres, it is difficult for Council to access viable alternate disposal locations.

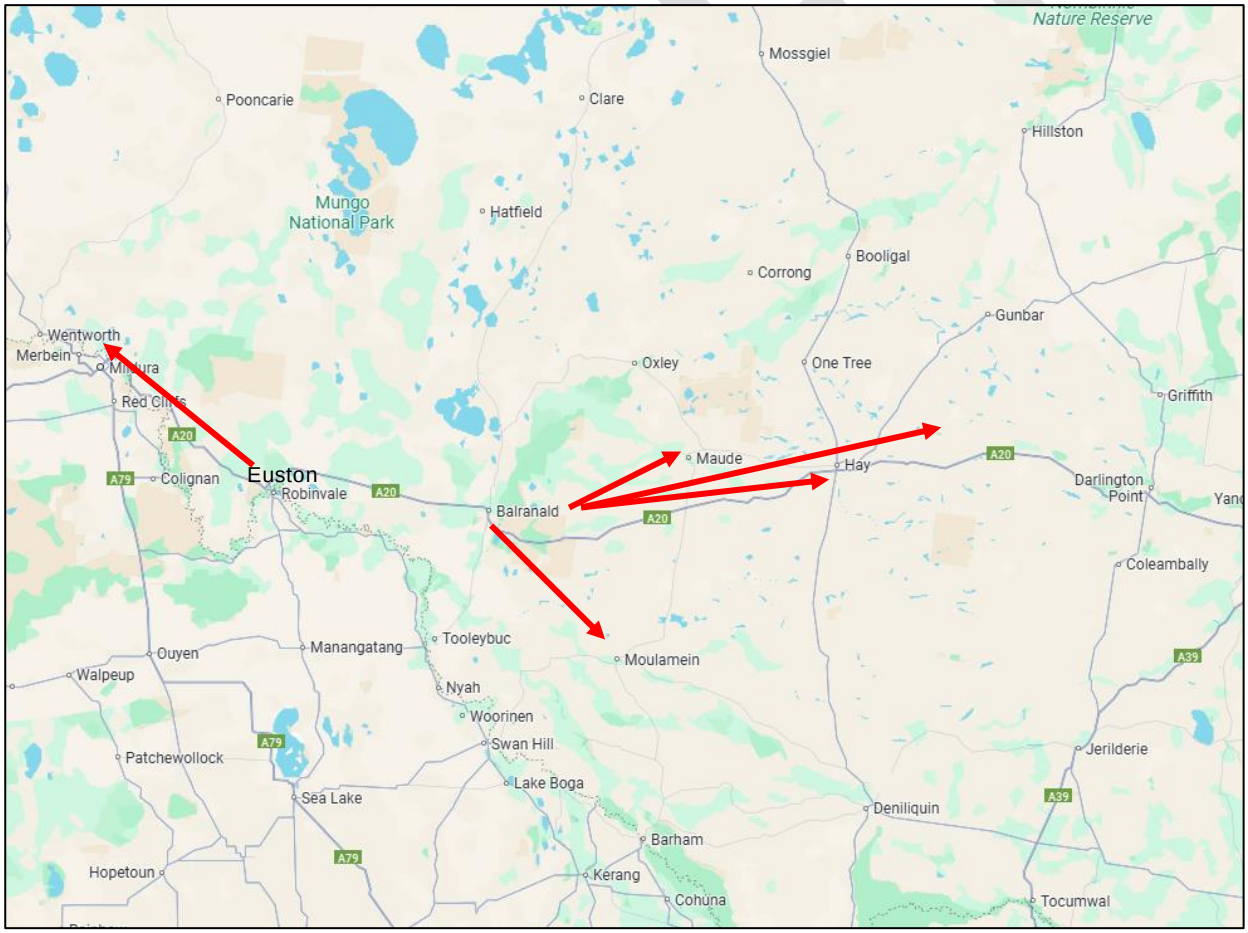


Figure 6: Map of the areas/towns surrounding Balranald and Euston – disposal locations

By way of example the following details are provided for the nearest towns/landfill locations in NSW. (**Note:** the nearest landfills located in Victoria have not been considered due to the Victorian Waste Levy making the disposal of waste in that significantly more expense than disposal in NSW):

- **Hay Shire Council** – Hay landfill: 130kms from Balranald.
- **Hay Shire Council** – Maude landfill: 130kms from Balranald.
- **Carrathool Shire Council** – Carrathool landfill: 187km from Balranald.
- **Murray River Council** – Moulamein Landfill: 95km from Balranald.
- **Wentworth Shire Council** – Wentworth Landfill: 106km from Euston.

Each of the above landfills are closed for several days in the week and on average charge approximately $200 for a large vehicle with more than 3 axles to dispose of waste. Additionally, it is unknown whether these landfills would accept BSC's waste given they may wish to preserve capacity for their own purposes.

There are a large number of regional/rural landfills throughout NSW that operate at a very low standard. This is due to them being exempt from the EPA Licence controls and monitoring required for landfills receiving more than 5,000 tonnes per annum. However, they operate more for local waste generation requirements rather than for waste from outside their Shire areas. Consequentially, the disposal costs in sparsely populated rural areas are relatively low when compared to regional and metropolitan centres.

7.2 Logistical/demographic challenges and Exemption opportunities

BSC cannot take advantage of disposal economies of scale or proximity factors to relatively close alternative landfills that its' regional and city-based colleagues have. Also, given the already noted small population base within the BSC area, there is no ability to achieve economies of scale at the current landfill facilities.

Given the above, it is considered unreasonable to assume that a relatively small rural Council like BSC will have the means to absorb the significant cost and resource burden associated with implementing best-practice policies that are based on economies of scale and accessibility.

The report author contacted the LGNSW Department to determine the scope for exemption for small rural Councils such as BSC. In brief, the information received was positive and noted that Councils like BSC are well positioned to obtain exemptions given the previously mentioned challenges (see previous NSW Government announcement in the Introduction).

Given BSC's overall position, many of the recommendations contained in this strategy are based upon an approach that is more aligned to achieving outcomes that consider Councils resource and financial position wholistically, and that focus on delivering an enhanced sustainability outcome.

7.3 BSC – Waste Management Contracts

The following table provides a summary of best practice Waste Management contracts that in an ideal world BSC would have in place. Not all of the listed contracts are applicable to BSC given the limited scope of waste management within the region based upon population size and waste generation volumes.

Service	Service Provider	Contract Expiry Date
Current services and contracts		
Residual garbage collection	BDS Automotive	TBC
Food and Garden organics processing	At landfill, contract shredding	N/A
Balranald landfill equipment hire	Details TBC	Details TBC
Metal processing	Details TBC	Details TBC
Mattresses	Details TBC	Details TBC
Tyres	Details TBC	Details TBC
Euston landfill operations Contract	Robinvale Waste	June 2025
Waste services to Council facilities	Details TBC	Details TBC

Service	Service Provider	Contract Expiry Date
Medium priority introduction		
Food and Garden organics collection	N/A	N/A
Recycling collection	N/A	N/A
Garden organics processing	Details TBC	Details TBC
Public place recycling	Not in place	N/A
Public place residual	Not in place	N/A
Long term priority introduction		
Mixed recyclable processing	Not in place	N/A
Residual processing and disposal	Not in place	N/A
Clean up collection	N/A	N/A
Clean up processing and disposal	N/A	N/A
Street sweepings and illegal dumping disposal	Details TBC	Details TBC
Resale Shop	N/A	N/A

Table 11: Summary of BSC Waste Management Contracts

7.3.1.1 Landfill Contract discussion

Long-Term Plans of Management

The comprehensive Long-Term Plans of Management (LTPoM's) for Balranald and Euston landfill sites provide little, to no discussion, on the long-term benefits or risks to BSC of operating one or both landfills. Quite simply, if there is no financial advantage in continuing to operate the landfills, but on-going or increased risk to Council, then a review of the landfill operations at Euston (at the very least) must be carried out.

If BSC were to consider the potential closure of the Euston landfill, the following facts, assumptions and estimates are provided as discussion points. Further data and conducting more in-depth research into the preferred options is needed in conjunction with the below points:

- The collection of BSC waste in Euston for disposal is estimated at less than 400 tonnes per annum. This waste is disposed of at Euston landfill, at no actual cost to BSC.
- The saving to BSC is in contractor collection time, as the alternative is to bring the waste back to Balranald landfill.
- This extra collection time could cost Council about $20,000 per annum, but discussions with the contractor are necessary.
- Another benefit of operating the Euston landfill is the small vehicle drop off facility. The site supervisor informed the author that the majority of small vehicle waste came from Robinvale residents and tradespersons.
- Thus, the possible closure may not impact Euston residents to a large extent. It may require a small bin transfer operation or vouchers to Robinvale landfill.
- The estimated additional cost for the disposal of Euston waste, either by a contractor or self-haul, would need to be offset by the value of the reduction in risk and liability that Council may be exposed to currently.

Accordingly, a part of the strategy going forward is the recommendation to carry out a detailed review of the Euston landfill operations, costs and risks to Council, given the circumstances described above.

Out of BSC waste disposal options

If BSC had no local landfills they would have to aggregate and transfer large loads of waste to out of area landfills. The infrastructure and operating costs for this mode of operation are as follows:

- necessary aggregation and loading points - approximately $100 per tonne
- transport costs - approximately $70 per tonne
- disposal costs at a non-BSC landfill - approximately $205 per tonne.

Thus, based on the above, the total costs per tonne to move to disposal at an out of area landfill is estimated to be approximately $375 per tonne. This estimated disposal cost significantly outstrips the per tonne disposal cost associated with operating the BSC Landfills (currently approximately $200 per tonne), by an estimated $175 per tonne.

If BSC were to absorb the above cost and/or pass it onto the community it would make waste disposal financially restrictive for most users and likely result in significant waste management issues occurring throughout the Shire (i.e., a significant increase in legal dumping activities, etc.). On this basis it is reasonable to suggest that continued operation of the BSC landfills is the most economical option for BSC sourced waste disposal under present conditions.

Community Recycling Centre

It is noted that Council has not established a community recycling centre (CRC) for household problem wastes (i.e., paints, used oils, batteries, fluorescent tubes, gas bottles, and certain types of metal containers) at either landfill.

Given the absence of the provision of this service in the region, it is recommended that BSC investigate the feasibility of establishing a CRC at one or both landfills.

It is noted that Government grants for the establishment of a CRC are not currently available. However, should grants be announced in the future for the establishment and servicing of a CRC, then Council should consider applying for a grant.

7.4 Fees and Charges

The following table provides a comparison of some of BSC's landfill fees against its' neighbouring NSW Councils.

Waste disposal item	Cost					
	BSC	Hay Shire Council	Murray River Council	Wentworth Shire Council	Carrathool Shire Council	Central Darling Shire
One axle trailer	$16.00	$10.00	Domestic waste - $178.00 per tonne	Varies depending on trailer set-up/volume.	$20.00	$50 for the first cubic metre, and an additional $10 for every additional cubic metre.
Two axle trailer	$24.00	$20.00	Domestic waste - $178.00 per tonne	As above	$40.00	
Car tyre (x2)	$16.00	$28.00	$28.00	$22.00	$30.00	$20.00
Truck or large machinery tyre	$40.00	$35.00	$29.00	$48.00	$40.00	$20.00
Mattress – Single	$16.00	$20.00	$32.00	$22.00	-	-
Mattress - Double	$24.00	$30.00	$32.00	$42.00	-	-

Table 12: Comparison of a selection of BSC waste disposal fees with neighbouring NSW Councils.

BSC's landfill waste disposal fees are generally commensurate with its' neighbouring Councils.

There may be an opportunity to raise the fees for mattress disposal based upon the charges in place elsewhere. It is recommended that BSC conduct a more thorough analysis and comparison of its fees and charges against other Group 9 Councils to further determine if there are waste streams that may lend themselves to a modest fee increase.

The focus of any future fees and charges review should be on ensuring that the user pays the full cost associated with disposal, processing, and recycling/diversion.

7.5 Moving from a 1-Bin system to a 2 or 3-Bin system

FOGO/Recycling context and a 3-bin system.
In general, RAMJO notes that as NSW Council waste collection contracts expire, new collection contracts will (or may) need to include a service for kerbside organics.

Notwithstanding the above, the management of self-haul green waste to the Balranald landfill should be improved until the EPA mandates an alternative course of action. The primary action would be to use the shredded green waste for erosion/dust/sediment control over intermediate covered areas or as the re-vegetation medium over final capped areas. This will be especially important on the overly steep, existing perimeter batters and the (flat) completed filling areas where the dispersive soil cover is exhibiting erosion channels.

If BSC is forced to implement a FOGO collection service in the future, the least expensive processing location for this service is the Balranald landfill. Balranald landfill could accommodate some very basic composting within the site, with the produced material then being used for landfill rehabilitation.

Council does not provide a kerbside recycling service currently and there are no provisions for the acceptance of household recyclables at either waste facility.

However, there is a "return and earn" outlet for drink containers at the Balranald Takeaway on Market Street that supports community recycling.

It is recommended that Council consider recycling initiatives more broadly when determining the scope of a future household waste collection service.

What a 3-bin system could look like
If BSC where to implement a 3-bin kerbside waste collection system in the future it would likely be along similar lines as that which has recently been implemented by Hay Shire Council (see the following image).

Figure 7: Hay Shire Council 3-bin system details (Source: Hay Shire Council website)

It is recommended that BSC obtain detailed information from Hay Shire and other similar sized Councils/those with similar logistical challenges that have implemented a 3-bin system. Research into the costs and logistics associated with implementation, processing and recycling methods/contractors, rate increase impacts, and more will help BSC to develop a robust business case as to whether a 3-bin system may be a viable option in the future.

7.6 Waste Data/Composition and Performance

The RAMJO waste strategy template recommends obtaining a range of separate waste and recycling streams data and displaying such within a strategy. This is to align operations with the state policy of reducing waste to landfill and a preferred 3-bin system for household waste.

Currently, BSC has very little data to work with, primarily due to it not being necessary until now.

As part of the Action Plan going forward, it is recommended that BSC progressively review missing data elements and assess whether they are needed. The primary data elements missing and recommended for collection are as follows:

- bin composition audit
- the amount of the various materials received at the landfills
- what waste streams are landfilled
- what wastes are recovered

The following image, taken from the Central Coast Council Waste Resource Management Strategy, is a good example of what a solid dataset for bin composition will look like if done well.

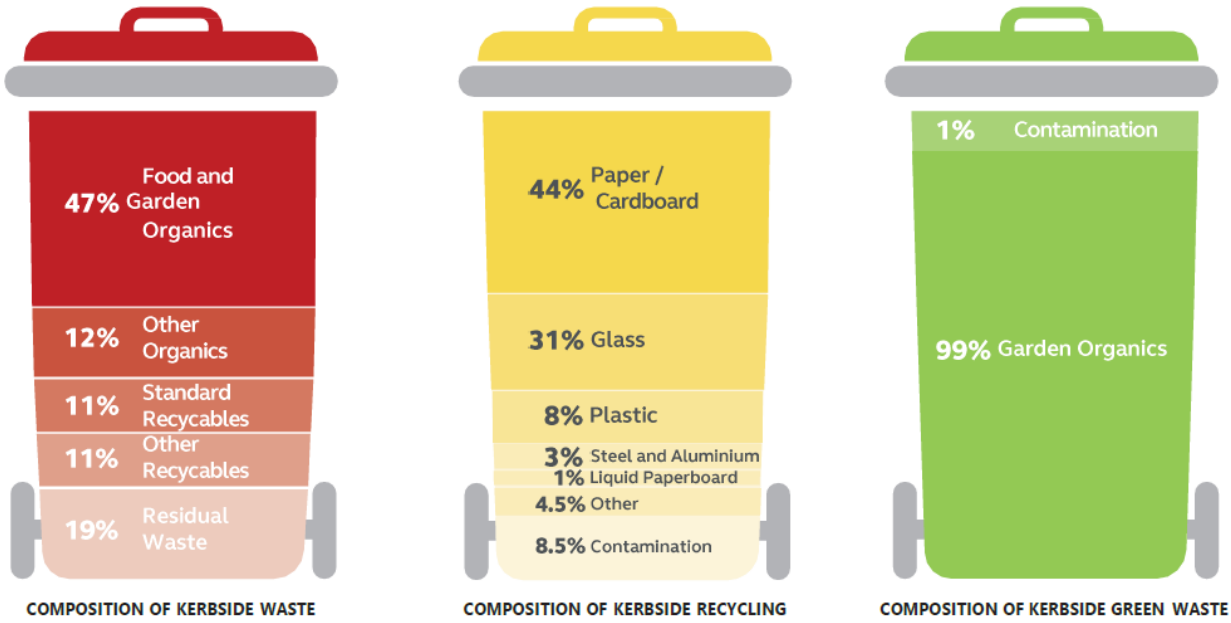


Figure 8: Example of the type of bin composition audit details BSC is recommended to collect. (Source: Central Coast Council Waste Resource Management Strategy)

An understanding of the composition of the waste generated by the average householder is crucial in the consideration of potential resource recovery and additional bin collection options, and therefore possible improvement of Council's waste management system.

Balranald has a single bin collected weekly, and a comparison with other NSW Councils providing this single bin service could provide information lacking on bin content composition in Balranald.

The usual composition audits look at the standard 3 bin systems (as per the example provided in Figure 8 above) and where improvements can be made in better placement of the separate materials in the bins by the householder, thus leading to a further education program.

For Councils delivering waste and recyclables to third parties and paying disposal charges, this composition analysis can result in cost savings by diverting materials to less expensive disposal or processing facilities.

This is not the case at Balranald as the one bin contains all and the landfill operational costs are fixed, regardless of tonnes disposed.

A bin composition audit in BSC's case is relatively simple and could be carried out internally. The minimum number of bins suggested for an audit is 75, as this number provides some statistical confidence in the data. 75 bins would provide about 1,500kgs for sorting and separation, but a lesser number, say 30, might be trialled in the first instance as the separation process is basic and simple.

The audit does not have to be detailed, rather it just needs to look for:

1. residual waste for landfill,
2. food and green organics waste items, and;
3. recyclables.

An internal audit would require a separate collection of the selected dwellings, and delivery of the contents to a shed for sorting. Three persons should complete sorting of this recommended volume of waste in a day and would need some way of weighing the sorted materials. Estimated costs internally with local labour are about $3,000. An external audit would be more costly, most likely around $5,000 to $8,000.

7.7 Waste Streams

The following details are provided on the types of waste streams that are generally received at landfills and types of data that RAMJO would like to receive in the future. The following definitions are provided in the context of the RAMJO's desired data tables provided in this section.

i. Municipal Solid Waste (MSW)

MSW is solid waste from households and local government operations, including waste placed at the kerbside for council collection and waste collected by councils from municipal parks and gardens, street sweeping council engineering works and public council bins.

MSW can be categorised into two waste sub-streams as follows:

- kerbside.
- self-hauled.

Kerbside waste is waste that is presented at the kerbside by residents for the collection and processing by Council. Self-hauled waste is waste that is transported to a facility by residents for processing or landfilling and is of a municipal nature. Self-hauled waste is not recorded in landfill records.

ii. Kerbside Waste (and commercial waste collection)

In 2023/24 an estimated total of 730 tonnes of material was collected at the kerbside as part of Council's kerbside collection service, based on the landfill reports. The kerbside collection service consists of a weekly collection of waste in a 240L red-lidded bin.

The split of residential and commercial tonnes collected is not available and this is important data to collect for the future.

Although Council does not currently offer residents a kerbside organics service, residents do have access to disposal options at the Balranald and Euston Landfills. In 2023/24 the number of tonnes of green waste and timber material delivered to the Balranald landfill was 166 tonnes.

The current kerbside collection system results in a resource recovery rate of zero % as shown in Table 13, as everything collected is disposed to landfill.

Table 13: Kerbside tonnages & resource recovery rate

	Tonnes Collected	Tonnes Landfilled	Tonnes Recovered	Diversion Rate
Red-lidded waste bin	730	730	0.00	0%
Total	**730**	**730**	**0.00**	**0%**

The typical materials found in the kerbside waste bin are shown below.

Table 14: Kerbside Composition

Residual Waste Composition		Recycling Composition		Green waste composition	
Material Type	**Percentage**	**Material Type**	**Percentage**	**Material Type**	**Percentage**
Garden & other Organics		Paper & Paper Products		Garden & other Organics	
Food/Kitchen Organics		Glass		Food/Kitchen Organics	
Other		Plastics		Paper & Paper Products	

Residual Waste Composition		Recycling Composition		Green waste composition	
Material Type	Percentage	Material Type	Percentage	Material Type	Percentage
Plastics		Ferrous		Other	
Paper & Paper Products		Organics			
Glass		Non-Ferrous			
Ferrous		Other			
Non-Ferrous					

Table 14 demonstrates the critical data set that is needed to move forward on organics diversion.

The amount or % of food waste in the current bin determines the costs of implementing a second collection service for a dedicated FOGO bin. BSC should work towards collecting similar data to that noted above.

iii. Container Deposit Scheme

The *WARR Amendment (Container Deposit Scheme) Act 2016* established the Container Deposit Scheme (CDS) to reduce litter and recover, reuse and recycle drink containers. The CDS "Return and Earn" was introduced in 2017 facilitating a 10-cent refund for eligible containers when presented to a collection point.

In NSW, eligible containers in kerbside recycling bins are also redeemable by councils through an agreement with the Materials Recovery Facility (MRF) operator providing councils with a source of revenue.

Balranald does not provide a recyclable bin collection service, and any revenue from eligible containers would be negligible compared to the costs of providing the service.

iv. C&I Waste

C&I waste is solid waste generated by business, industries (including shopping centres, restaurants and offices) and institutions (such as schools, hospitals and government offices), but not C&D waste or municipal waste.

v. C&D Waste

C&D waste is solid waste sources from construction and demolition works, including building and demolition waste, asphalt waste and excavated natural material.

7.7.1.1 Diversion Rate

Diversion rate is defined as the proportion of total waste generated that is recovered, either through reuse, recycling or treatment, and is therefore diverted from landfill. Council's current diversion rate, across its entire waste management system is estimated at about 8%.

Council currently recovers approximately 0% of the waste materials that are generated by its residents at the kerbside.

Council's performance against the Waste Diversion Targets set by the NSW EPA in the WASM Strategy which focus on transition toward a circular economy, are provided in Table 15.

Table 15: WARR Waste Diversion Targets

Waste Type	Council current Diversion Rate	2030 Diversion Target
MSW	0%	80%
C&I	0%	80%

Waste Type	Council current Diversion Rate	2030 Diversion Target
C&D	27%	80%
Overall Diversion from Landfill	8%	80%

Council is significantly below the C&D, MSW and C&I NSW EPA diversion targets. The overall diversion rate is solely reliant on C&D waste, which represents 29% of the waste stream and which has a diversion of 27%. Increasing diversion from landfill may be financially detrimental as there are no recycling facilities in close proximity to BSC.

7.8 Waste Collection Operational details

7.8.1 Discussion

Based on our discussions with the contractor, BDS Automotive, there is minimal to no spare available truck time on Monday and Friday for incorporating a FOGO collection at Balranald and Euston. A separate FOGO collection would therefore require extra truck collection days, and additional collection costs, unless a fortnightly alternating collection was provided.

The following scenarios are provided should BSC consider the implementation of a FOGO collection:

- **Euston area** – if a FOGO collection was provided in Euston, it would require the Balranald main street pick up to be allocated to a separate day. The truck could then collect the Euston kerbside waste, dispose of it to the Euston landfill, then carry out a FOGO collection and bring the FOGO back to Balranald.

  An option to consider is the disposal of FOGO at Euston landfill, however receival and processing issues will need to be addressed.

  Collection times will increase and so to with the associated costs of providing this service.

- **Balranald area** – a Balranald FOGO collection would require an additional one (1) day of collection operation and increased collection costs.

7.8.2 Collection solution option

A two-compartment collection body provides the collection of two separate waste streams in one visit. The costs of the body are higher than a standard one compartment body, approximately $100,000 extra. This type of body saves a truck visiting twice as both bins would be emptied in one visit. The determining factor is how much additional green waste would be placed in the FOGO bin, as compared to the current 1-bin system, as there are currently 2.5 loads to the landfill of garbage, containing food organics on the collection day.

The collection times would increase as two bins are emptied at each dwelling. Again, resulting in increased collection costs. This might require an additional collection day in Balranald.

Figure 9: Photo of a Twin compartment side loader rubbish truck.

7.9 FOGO processing options

There are several options that BSC can explore for the processing of FOGO waste, however each option comes with its' own challenges and corresponding price tag.

It will be necessary for BSC to collect accurate data on current general waste volumes and to produce more accurate waste volume and tonnage estimates for FOGO collection and processing. This will facilitate BSC making an informed decision on the preferred path to be taken.

Through the development of this strategy the following FOGO options were considered:

1. Business-as-Usual (BAS).
2. Support and expand at-home composting.
3. Disposal of food organics direct to sewer.
4. Develop a FOGO processing facility/area within the landfill at Balranald and/or Euston.
5. Transport FOGO waste to a suitable FOGO processing facility outside of the BSC region.

The amount of FOGO collected from a dedicated FOGO bin is expected to be less than 400 tonnes per annum. This figure is based on average FOGO bin weight data from other Councils, an average being 16kgs per bin, dependent on weekly or fortnightly collection frequencies. This tonnage is very low and there are no low capital cost equipment solutions for processing such minor volumes.

7.9.1 The Business-as-Usual approach

The BAS approach is seen as the most economical option for BSC given the logistics and expense associated with transporting FOGO waste to an internal or outlying facility. This is also due to the expense and resources required to develop a FOGO facility within BSC.

This approach would require a negotiated exemption with the relevant State government body, most likely with RAMJO and LGNSW support. The BAS approach is very cost effective but does not demonstrate any environmental sustainability and might not be supported by the BSC community.

7.9.2 Supporting and expanding at-home composting

This is the second most cost-effective means of providing organic waste diversion from landfill in areas where a separate FOGO collection is cost prohibitive. This alternative is one of the LGNSW recommendations and encompasses environmental sustainability principles.

Council could provide fully funded or subsidized compost bins for home use to each residential property within BSC to help reduce the amount of FOGO waste going into the general waste bins each week, thus meeting the FOGO mandate.

There are roughly 870 dwellings throughout the BSC region that Council may need to provide compost bins to if this option was pursued. The estimated cost for the purchase of an individual compost bin, similar to the one shown in image below, is approximately $120 each.

A one-off outlay of $104,000 for the compost bins (see Figure 10 below for an example) is estimated if no ratepayer contribution is requested. Delivery costs and a composting guideline publication for residents would add to this one-off cost.

The possible one-off cost of $104,000(+) is compared to the following alternative cost scenarios/elements:

- **Scenario 1 – BSC supported service:**
  - Adding a FOGO to the kerbside residential waste collection service: $200,000 per annum
  - Composting/handling of FOGO waste at the BSC landfill/s: estimated at $50,000 per annum
  - **Total estimated annual cost: $250,000**

- **Scenario 2 – FOGO disposal outside of BSC:**
  - Adding a FOGO to the kerbside residential waste collection service: $200,000 per annum
  - Transport/disposal to a FOGO processing facility outside the BSC region: estimated at $150,000 for 400 tonnes per annum.
  - **Total estimated annual cost: $350,000**

Thus, the recurring cost to Council (and the community) could be anywhere between $250,000 to $350,000 per annum. This equates to a cost increase of about $400 per annum per eligible rate payer in waste charges, the cost of which would likely need to be directly passed onto the BSC rate payer.

Figure 10: Composting example - Tumbleweed 240L compost bin.

7.9.3 Disposal of food organics direct to sewer

The direct disposal of food organics to sewer is a good option for removing food waste from the landfills.

The sewer system overcomes the collection and transport costs associated with bin collections and processing facilities. The additional organic load at the sewerage plant can create issues necessitating an upgrade and would need to be researched and factored into the further development

of this scenario. It is noted that there may already be food organics to sewer in the area (e.g. coming from the Balranald Hospital).

Further high-level research into the viability of this scenario is supported.

7.9.4 Develop a FOGO facility within BSC

This option would require the development of a separate area from the main landfill operation, as far from residential waste disposal areas and neighbours as possible.

The costs to construct a FOGO processing facility are roughly estimated at $200,000. The major unknown cost is associated with the development of a run-off collection dam/s for contaminated water, based on the Hay facility discussed in the next section.

All weather truck access for unloading and a loader for stockpiling and turning the food and green organics is required.

7.9.5 Transport FOGO waste to a facility outside of the BSC region

Currently, the nearest FOGO facility to Balranald is located at Hay, which was developed with RAMJO support. This facility is about 133kms from Balranald. Hay Shire collected FOGO is processed on an engineered composting pad with run-off collection.

Discussions with Hay about a Balranald FOGO collection being processed there had positive results, however the Hay facility would have to be expanded to cater for additional FOGO. A processing fee would most likely be imposed by Hay Shire, a rough estimated cost being $70 per tonne. With aggregation to a larger truck and transportation of FOGO to Hay, the extra costs likely to be associated with using this location would be about $120,000 per annum. The collection costs incurred by BSC if collected on alternate weeks would be approximately $30,000 per annum.

Worm Tech is another organics processor that uses thermophilic composting and vermiculture techniques to process FOGO and other organic streams. Worm Tech has facilities located in Carrathool (FOGO) and Yenda (no FOGO) and is the only licenced facility located in the entire RAMJO region at present.

Carrathool is located 186 kms from Balranald, and about 270 kms from Euston. Carrathool takes green and food waste, and FOGO collections from several neighbouring Councils, and has a strong relationship with RAMJO. The facility operates under a permit and is operating with gate charges starting at $54 per tonne and a sliding scale upwards when contamination levels exceed about 5%.

7.9.6 FOGO Financials – the options

Analysis of the BSC waste management financial data found that there is an overall deficit of $140,000 forecast for 2024/2025. The commercial collection service is showing a forecast surplus of $54,500.

The landfill operating costs are $260,000 per annum, and we have assumed that this is all associated with the Balranald landfill given the Euston landfill is operating under contract to Robinvale Waste. Tip fees for the landfills is showing an income of $20,000 for 2024/2025 combined across Balranald and Euston landfills.

The landfill operations are unusual when compared to most rural and regional Councils as there is currently just under 7,000 tonnes being landfilled per annum in accordance with EPA NSW reports. No licence is required for either landfill based upon these estimated tonnages being received. Euston is receiving almost all its input from the Robinvale area (i.e., Victorian waste) which is concerning given it appears that BSC is to some extent subsidising Swan Hill Rural City Council residents (or Robinvale Waste) for their waste disposal needs.

Again, as mentioned earlier in this document, disposal of Victorian waste in NSW avoids the Victorian landfill levy, which currently stands at $66.30 per tonne municipal, and $116.76 per tonne industrial. From 1st July 2025 the levy increases to $84.78 municipal and $149.33 industrial.

The waste disposal occurring at Euston based on the EPA report is showing less than 200 tonnes of the 4,800 tonnes received is Balranald waste. Thus, at least 4,000 tonnes of Robinvale area waste appears to be landfilled at Euston, saving (or avoiding) somewhere between $300,000 and $400,000 of levy revenue to the Victorian Government. It is believed that this situation is known to the Victorian Government and the question is how long it may be allowed to continue, as the avoided levy jumps to $340,000 or $600,000 per annum in mid-2025.

Given the above discussion, the future of the Euston landfill operation requires a more detailed study based on accurate data capturing exactly what is being landfilled there. The current operating arrangements are a significant environmental risk to Council, and without proper operational contracts with indemnities protecting Council and some form of reimbursement to BSC, it may be prudent to suspend the arrangement.

The following table provides a summary of the FOGO management options and their estimated costs.

No.	Recommendations	Collection system	Extra bin costs	Collection costs	Disposal costs to BSC landfill	Reoccurring annual costs	Total
1	Do nothing	N/A	$0	$0	$0	$0	$0
2	Home based composting (subsidized bins? 50%)	Householder	$100,000 one off Yr 1	$0	$0	$0	$52,000
3	Extra FOGO bin weekly collection	Current contractor	$83,900	$200,000	$30,000	$230,000	
4	Extra FOGO bin fortnightly alternating collection	Current contractor	$83,900	$30,000	$40,000	$70,000	
5	Free green waste disposal at local landfills	Householder	$0	$0	$20,000	$20,000	
6	Free food disposal at township locations	Contractor	*$??	$?	$?	$?	
7	Sewer discharge from home in-sinkerators	**Sewer system	$0	$0		$0	

Table 16: Summary of FOGO management options estimated costs.

Note: *the number of bins required for a township collection, collection frequency and costs requires more information as well as community support.
** May well require sewage treatment plant upgrade.

7.10 Emissions

At the time of writing, there wasn't a BSC Emissions Policy in place for the region. This isn't considered to be an item of concern given the relatively small volumes of waste handled in the region, thus the need to develop an Emissions Policy is a low priority.

PART E – THE STRATEGIC DIRECTION AND HOW TO GET THERE

8. THE STRATEGIC DIRECTION AND HOW TO GET THERE

This Strategy details a series of actions that can assist Council to progress towards the 2023/2024 diversion targets set by the NSW EPA and those targets formally endorsed by RAMJO in the 2022-2027 Regional Strategy.

The immediate action is to comply with the introduction of a Food Organics service for commercial properties by the end 2025. Council currently provides collection services to commercial properties and BSC must decide if this will be extended to a FOGO bin. This FOGO service may then be expanded to households by the end of 2030.

Ideally, Council could set landfill diversion targets, but this is questionable when the landfill life is projected to be close to 100 years. This will require collection of reasonably accurate waste disposal data in the first instance to facilitate the task of setting targets. Once BSC has a robust dataset it could then set suitable targets to improve performance.

This Strategy is a roadmap that highlights the key priorities and activities that will be undertaken by Council to divert waste from landfill and deliver sustainable waste management outcomes for the region. This section details four priority areas and key actions to be undertaken within those priority areas.

The priority areas and subsequent actions were developed in line with the NSW state strategy and RAMJO strategy which included increasing and improving waste infrastructure and introducing or expanding kerbside services in accordance with the NSW EPA WaSM strategy.

8.1 Action Items

No.	Priority items / Recommendations
Priority – Increase resource recovery and improve landfill performance	
Action 1	**Carry out a waste composition audit to better understand the current waste types deposited of in the BSC red lidded bin.**
A waste composition audit is fundamental to understanding the current waste disposal trends in the red lidded bin. This data is crucial to making informed decisions going forward.	
Action 2	**Undertake a review of the Euston and Balranald Landfills and Transfer Station Fees and Charges.**
Consideration should be given to the review of existing fees and charges at both Landfills/Transfer Stations to ensure all costs are incorporated into the charges. This will require the collection of data on what materials and how much is accepted at the landfills. These charges include but not be limited to the availability of adequate funds for future works such as the closure of the landfill facility at the end of its useful life. Consideration should also be given to the way fees are applied to the disposal of waste and recyclable material to assist with resource recovery and diversion of waste from landfill. Providing a financial incentive to recycle or source separate material prior to disposal will assist in achieving this aim.	
Action 3	**Investigate the option of undertaking a trial for the kerbside collection of garden organics.**
The average NSW red-lidded waste bin in a 3-bin kerbside service contains 40% organic material (food organics and garden organics) that is sent to landfill instead of being recovered and processed into a valuable resource. The primary objective of source separated organics collection is to	

No.	Priority items / Recommendations
generate clean streams to divert these materials from landfill and facilitate a greater end use for the organics via composting or similar. The recovery of organic material from the red-lidded general waste bin is considered a key approach to increase recycling, which is Key Result Area 2 of the NSW Waste Avoidance and Resource Recovery Strategy 2014 – 21 and is supported by over 80 councils across NSW. Of the 130 councils in NSW, 40 offer a garden organic (GO) service and 41 offer a Food Organics Garden Organics (FOGO) service, with the remaining 49 councils not offering an organics service (as of March 2020). The implementation of a third kerbside bin for the separation of either garden organics or FOGO provides an improved level of waste management services provided to the community, whilst diverting organic material from landfill and reducing greenhouse gas emissions. In the case of BSC, the possible increased home composting approach may well provide a degree of best practice at affordable levels. This would demonstrate Council leadership in meeting state government waste diversion targets and combating climate change through reducing greenhouse gas emissions.	
Action 4	**Consider regional collaboration on alternative facilities processes for managing waste.**
RAMJO are the key body in facilitating the development of regional hub processing facilities, and in aggregating regional waste volumes to provide and justify waste material separation. The main hurdle is the large area that RAMJO covers, thus any hub location may well be outside of the BSC region and result in uneconomical transport distances.	

8.2 5-year Implementation Plan

Action	Task	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029
1	Review annually of Fees and Charges at Balranald and Euston Landfill & Transfer Station					
2	Carry out a waste composition audit (red lid bins) to better understand the current waste types deposited.					
3	Trial Kerbside FOGO Collection Service					
4	Education Officer type support for Resource Recovery activities					
5	Community education for a possible home composting scenario					
6	Public Place Recycling					
7	Regional Collaboration on waste contracts					
8	Infrastructure builds – Composting pad at BSC Landfill					
9	Kerbside collection contracts in place					
10	Review of Domestic Waste Management Charges					
11	Service area further defined if FOGO introduced					
12	Monitor and implement Landfill Closure Plan					
13	Develop a residual waste future management plan for Euston only					
14	Review technological advances pertaining to putrescible waste					

Action	Task	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029
15	Develop a formal communication plan for recycling initiatives.					
16	Strategic direction setting – review the available options and refine the preferred way forward, including modifying the Waste Management Strategy to reflect Councils agreed position.					

ANNEXURES

APPENDIX 1 – BSC WASTE MANAGEMENT STRATEGY PROJECT METHODOLOGY

The steps taken to complete the Waste Management Strategy project were as follows. Each stage contained technical and human resources input that were used to formulate the findings in this strategy.

Stage 1: Project Inception

- Met with Project Manager to confirm scope, key contacts, milestones etc. and commence the project.
- Met with Project Review Team to confirm objectives of the review and level of stakeholder engagement
- Reviewed project timetable
- Nominated Council's Project Manager and Project Officer
- Identified stakeholders

Stage 2: Background Review and Information gathering

Collected key documents and data for review including:

- Waste Services Strategic Review – Robert Bailey Consulting April 2022.
- Kerbside data and site receival data.
- Balranald Waste Facility Long Term Plan of Management - Robert Bailey April 2022.
- 2024/25 Fees & Charges schedule – Waste Management Charges.
- Balranald Community Strategic Plan 2032.
- Balranald Overarching Asset Management Plan.
- Asset Management Policy.
- Balranald Long Term Financial Plan.
- Balranald Delivery Program 2022-2026.
- Operational Plan 2024/2025.
- Revenue Policy 2024/2025.
- Current contracts with service providers (i.e., Robinvale Waste contract for management of the Euston Landfill, and Balranald Diesel Services for the kerbside collection).
- RAMJO Regional Resource Recovery Strategy 2022-2027

Interviews occurred with BSC officers and others as a structured exercise borrowing from the CT Management Group *Service Profiling approach at a sub-service/activity level.* The interview process was focused upon providing context for Sub-services within the development of a strategic analysis of the service details.

Stage 3: Public consultation: Round 1

Public Consultation meetings occurred in Balranald and Euston. These meetings were focused on discussing the approach being taken to develop the Draft Waste Management Strategy document and the preliminary views of the community in relation to the provision of Waste Services in the region.

Stage 4: Draft Waste Management Strategy development

Develop the draft Waste Management Strategy in alignment with the scope of works and deliverables requested by BSC.

Stage 5: Public consultation: Round 2

Second round Public Consultation meetings will occur during Stage 5 in both Balranald and Euston. The meetings will focus on discussing the key findings in the Draft Waste Management Strategy document and any alternative views or perspectives in relation to them.

The presentation of the Draft Strategy and the ensuing discussion will focus on ensuring the BSC community were able to follow the key themes and content discussion items.

Stage 6: Final Waste Management Strategy

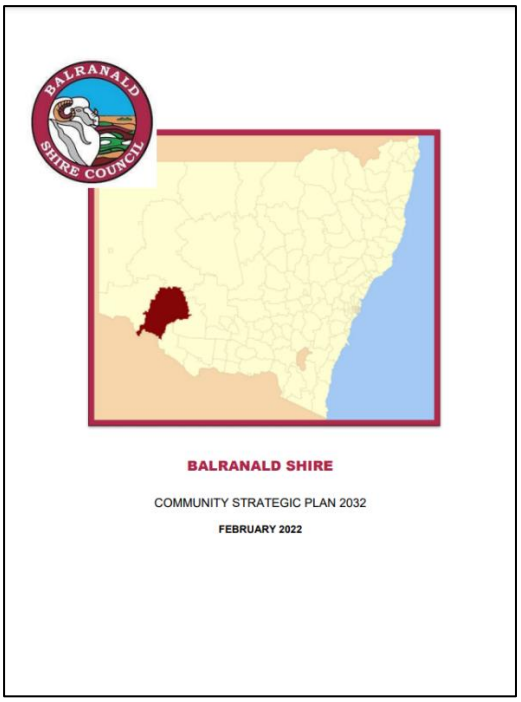
Following CT Management receiving and considering the public consultation feedback on the draft Waste Management Strategy, the feedback elements will be discussed with BSC officers and the final content elements agreed upon for amendment and inclusion in the final draft.

APPENDIX 2 – BACKGROUND REVIEW

Balranald Shire Council Community Strategic Plan 2032

The Community Strategic Plan is the highest level of strategic planning undertaken by Council—all other plans must support achievement of Community Strategic Plan (CSP) objectives. Under the NSW Local Government Act 1993 the CSP must address the following:

• Articulate the community vision and reflect aspirations.
• Consider state and regional plans as they apply to the council. • Contains, as a minimum, community vision, strategic directions and outcomes, and a means of measuring progress.
• Be based on social justice principles.



Given the function of the CSP as Councils overarching strategic direction and guiding document, its' contents were considered and referenced throughout the development of the Waste Management Strategy. The following strategic elements from the CSP are noted as the primary strategic focus areas of interest to Waste Management:

- Celebrate and promote our unique local environment
- Protect our water assets
- Manage our waste sustainably (strategy development is key part of this element).

NSW Waste and Sustainable Materials Strategy (NSWW&SMS)

The WaSM Strategy outlines the strategic direction for sustainable waste management practices in the state. The WaSM Strategy has three focus areas including:

1. Meeting our future infrastructure and service needs
2. Reducing carbon emissions through better waste and materials management
3. Building on our work to protect the environment and human

The strategy outlines the actions that the NSW Government proposes to take to deliver on long-term objectives to transition to a circular economy.

New South Wales is transitioning to a circular economy over the next 20 years. This means we will minimise what we throw away and use and reuse our resources efficiently, making them as productive as possible. We will end up with less waste, less emissions, less harm to our environment and more jobs. The move will boost innovation and help drive our economy.

We need to have the services and infrastructure in place to deal with our waste safely, to ensure it does not become a problem for future generations. We also need to work with consumers, industries and other governments to make the circular economy a reality.

The strategy outlines the actions proposed over the next six years, the first phase of the strategy, is to deliver on long-term objectives.

These actions are backed by $356 million in funding to help deliver priority programs and policy reforms.

NSW Waste key reform initiatives:

- phasing out problematic single-use plastic items
- financial incentives for manufacturers and producers to design out problematic plastics
- having government agencies prefer recycled content
- mandating the separation of food and garden organics for households and selected businesses
- incentivising biogas generation from waste materials

NSWW&SMS targets:

- reduce total waste generated by 10% per person by 2030
- have an 80% average recovery rate from all waste streams by 2030
- significantly increase the use of recycled content by governments and industry
- phase out problematic and unnecessary plastics by 2025
- halve the amount of organic waste sent to landfill by 2030
- reduce litter by 60% by 2030 and plastics litter by 30% by 2025
- triple the plastics recycling rate by 2030

Legislative and Regulatory Context

The following is a brief synopsis of the legislative and regulatory context within which BSC are required to provide waste management services to the community.

The Legislative context for Waste Management is complex, with various Government Authorities having a say in waste management and recycling, at the same time trying to direct certain activities through mandates and in some cases penalties for non-compliance.

The reality and difficulty is that one size does not fit all, with Council areas and populations in NSW varying from 0.1 person per square kilometre in Balranald to 8,300 persons per square kilometre in Sydney. This has major financial implications for smaller regional Councils with a very small rate base spread over relatively large areas.

The Strategy draws on State based legislative, policy, strategy, educational and economic tools relating to waste management in NSW. The legislation and regulations include:

- Protection of the Environment Operations (POEO) Act 1997
- Waste Avoidance and Resource Recovery (WARR) Act 2001
- Protection of the Environment Operations (Waste) Regulation 2017
- Product Stewardship Act 2011

These key regulatory documents describe the requirements for transporting, storing, processing, managing, recovering, and disposing of waste and recyclable material.

Protection of the Environment Operations Act 1997 and the **Protection of the Environment Operations (Waste) Regulation 2014.**

The above noted act and regulation set the overarching waste management goals and strategic direction for NSW which are as follows.

Waste management goals:

- Reduce the amount of waste generated per person by 10% by 2030
- Increase the use of recycled materials by industry and governments
- Reduce the amount of organic waste that goes to landfills by half by 2030
- Phase out unnecessary and problematic plastics by 2025
- Reduce litter by 60% by 2030

Waste management strategies:

- The NSW Plastics Action Plan aims to reduce the amount of unnecessary and problematic plastics
- The NSW Government has a waste levy to fund the development of waste and resource recovery facilities.

Product Stewardship Act 2011.

The following fact sheet images provide a snapshot of the intent of the Product Stewardship Act:

National Waste Policy

Fact Sheet

Australian Government

Department of Sustainability, Environment, Water, Population and Communities

Product Stewardship Act 2011

The *Product Stewardship Act 2011* will help reduce waste and prevent harmful materials from ending up in landfill by increasing recycling and the recovery of valuable materials from products.

All levels of government, industry and the community have a shared responsibility for the impacts of the products we manufacture, consume and dispose of in the course of going about our daily lives.

Not only is there an ever-increasing array of products for us to choose from, many of these also have a short product life, making them a significant and growing component of the waste stream.

Whether they contain substances that may be harmful to the environment, or valuable materials that can be reclaimed and re-used, there is good reason to ensure that we handle these products in a safe and environmentally responsible way.

WHAT IS PRODUCT STEWARDSHIP?

When people recycle packaging and products, or when companies design their product to limit the amount of materials and resources required for manufacture, or limit the amount of hazardous materials those products contain, they are being good product stewards.

Good product stewardship means doing the right thing for the benefit of the environment – and ultimately ourselves.

Product stewardship activities such as recycling help to reduce the amount of waste going to landfill, increase recycling rates, recover valuable resources that can be used to make new products and prevent harmful substances found in certain products from getting into the environment.

This Product Stewardship Act will encourage more of us to become good product stewards and to support product stewardship activities.

WHY DO WE NEED LEGISLATION?

Waste in Australia is growing. Between 2003 and 2007 the amount of waste in Australia increased by nearly one third to around 44 million tonnes—the equivalent of over 2000 kilograms for every Australian every year.

The Product Stewardship Act acknowledges our shared responsibility for the impact of all of the products we use and consume.

The Product Stewardship Act paves the way for any number of product stewardship activities and schemes to be set up, as well as for existing schemes and projects to be accredited. The many activities likely to be carried out under this legislation will help reduce waste and recover valuable resources in a safe and environmentally responsible way.

Providing a legislative basis for these activities also means that consumers can have confidence in claims made by companies that they are being good product

stewards.

HOW WILL IT WORK?

The Product Stewardship Act provides for a flexible and practical approach to product stewardship by recognising that each product, material and industry is unique.

It allows for products and materials to be covered as the need arises, for example to keep step with Australia's international obligations on managing certain types of waste.

A list will be published each year of products being considered for coverage by the legislation.

Products currently on the National Waste Policy implementation plan for product stewardship action include televisions and computers, packaging, tyres and mercury containing lights.

Proposals for future schemes under the product stewardship framework will need to be evidence based, taking into account both the costs and benefits.

The Product Stewardship Act allows for industries and products to be regulated in several ways, while also making provision for voluntary activities.

Voluntary accreditation of schemes encourages product stewardship without the need for regulation and provides the community with certainty that accredited schemes are actually achieving what they claim. Product stewardship organisations that are accredited under the legislation must meet specific requirements that ensure they carry out their activities in a transparent and accountable manner.

The majority of schemes to be covered under the Product Stewardship Legislation are likely to be voluntary, with an opportunity for both new and existing schemes to seek accreditation. .

Co-regulatory product stewardship schemes are delivered by industry and regulated by the Australian Government. The exact requirements (for example, where there is a requirement to meet a certain recycling target) and details of the activities to be carried out by a scheme operator will be detailed separately in regulations for each scheme.

The actions required in the regulations may include the need to avoid, reduce or eliminate waste from products.

Price impacts will be considered before any product is regulated.

Mandatory product stewardship would place a legal obligation on parties to take certain actions in relation to a product. Requirements that can be placed on parties using the legislation include the labelling of products, making arrangements for recycling products at end of life, or requiring a deposit and refund to be applied to a product.

The Product Stewardship Act also sets out the governance arrangements (the 'who does what'), the powers of the Regulator (the Australian Government), and the reporting and audit requirements for organisations delivering product stewardship schemes.

This includes details about how the Government will ensure compliance under the law, how it will be enforced, what constitutes an offence under the law and what penalties may apply if the law is breached.

NATIONAL SCHEME FOR TELEVISIONS AND COMPUTERS

Following a decision by all Australian environment ministers in 2009, televisions and computers will be the first products to be regulated under the legislation.

Please refer to the department's fact sheet *National Television and Computer Product Stewardship* Scheme for details. This can be found on the department's website at:
www.environment.gov.au/settlements/waste/ewaste/publications/index.html

FURTHER INFORMATION

Product stewardship is a key commitment under the Australian Government's long-term National Waste Policy to avoid and reduce the amount of waste generated and increase the amount of resources recovered from end-of-life products.

More information on the *Product Stewardship Act 2011* and the National Television and Computer Product Stewardship Scheme can be found on the department's website at:

www.environment.gov.au/wastepolicy

www.environment.gov.au/ewaste.

NSW Local Government Act 1997

The purposes of this Act are as follows:

a) to provide the legal framework for the system of local government for New South Wales,
b) to set out the responsibilities and powers of councils, councillors and other persons and bodies that constitute the system of local government,
c) to provide for governing bodies of councils that are democratically elected,
d) to facilitate engagement with the local community by councils, councillors and other persons and bodies that constitute the system of local government,
e) to provide for a system of local government that is accountable to the community and that is sustainable, flexible and effective.

Local Government NSW (LGNSW)

Local Government NSW is not a Government Authority; however they lobby on behalf of NSW Councils to the State and Federal Government.

Local Government NSW (LGNSW) is a peak body for Local Government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State. LGNSW is taking a lead role in advocating with the regulators to take account of the variables and provide exemptions based on individual Council circumstances. See later **Appendix 4** for more details on LGNSW's 2024-25 Advocacy Priorities.

The lobbying and presentations by the LGNSW may well provide BSC with a more financially acceptable solution moving forward, and the following abbreviated summary highlights the main areas that affect BSC and could be advantageous to BSC.

LGNSW's Policy Platform consolidates the voices of councils across NSW, reflecting the collective positions of local government.

Specifically relating to FOGO, LGNSW advocates for measures to address waste and recycling challenges, including the reinvestment by the NSW Government of the NSW waste levy to:

a) Urgently fund regions of councils to develop and implement regional waste plans for the future of waste and resource recovery in their regions, which include infrastructure and circular economy solutions to address the needs of our cities and regions.
b) Fund the delivery of priority infrastructure and other projects, procured by local government, that are needed to deliver the regional-scale plans, particularly where there is market failure identified in the regional plans.
c) Offset the full costs of implementing mandated FOGO services.

In addition, proposing that the NSW Government extend the roll-out of mandated FOGO services to multi-unit households until 2035 and refrain from mandating collection frequencies.

Exemptions

The Proposal paper refers to the EPA having discretion to grant exemptions from the household mandate, whether generally or in specified circumstances, and whether from the entire mandate or certain parts of it. These exemptions could therefore be automatic (general) exemptions based on meeting certain criteria, or exemptions provided on application. Either way, it will be important to have clear criteria and rationale for the exemptions.

RAMJO 2022-2027 Regional Resource Recovery Strategy.

The Riverina and Murry Joint Organisation (RAMJO) is a voluntary Local Government group comprised of two large sub-regional areas namely, the Riverina and Murry Waste Groups.

These two groups are separately funded; however, both operate under the RAMJO banner. Balranald Shire Council is an associate member.

RAMJO has prepared a Regional Resource Recovery Strategy 2022-2027 which sets the direction for the implementation of an efficient and sustainable waste management system across the region. The key objectives of the regional strategy include:

- Engage with the community through education and activities related to best practice waste management.
- Provide leadership and facilitate information exchange and skills development.
- Make a significant contribution towards the achievement of NSW's WASM Strategy targets.
- Reduce the amount of waste that is being directed to landfill.
- Improve successful funding application opportunities.
- Improve and increase current services for household recycling and organics collection; and
- Provide a sustainable and healthy environment through reducing the incidences of litter, illegal dumping, and number of landfills across the region.

The RAMJO Strategy has been developed through the guiding principles of the waste hierarchy and state and regional policies to direct our objectives and goals. The objectives convey RAMJO's and member council's commitment to continually improve the efficiency and effectiveness of waste management and resource recovery, so it does not become a problem for our environment and our future generations.

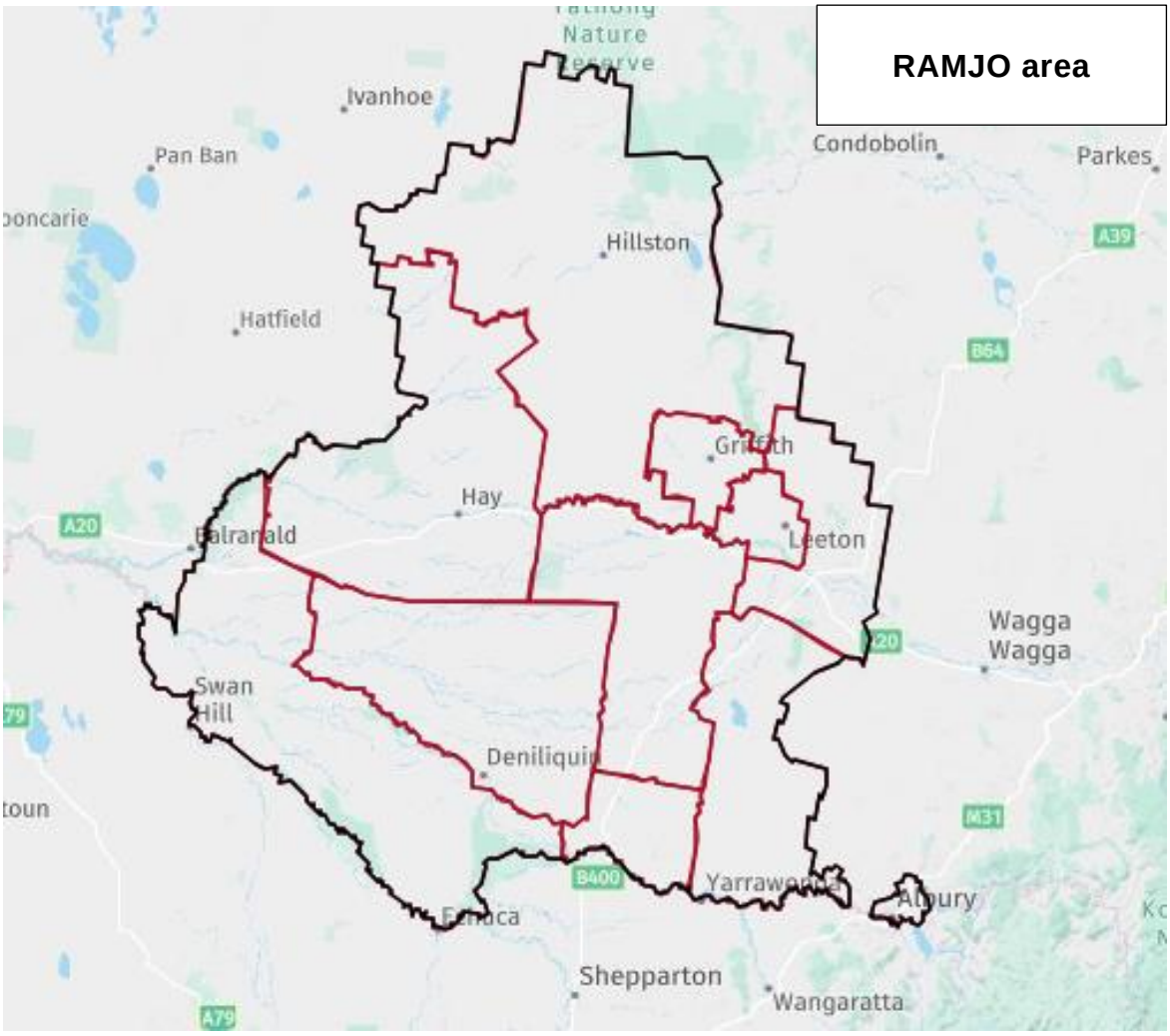


Figure 11: RAMJO area – Balranald is an associate Council.

The Government mandate for the removal of green and food organics from landfill is driven by:

1. costs reductions in disposal by delivering less waste to landfill and,
2. the greenhouse gas benefits by reducing the production of landfill gas at the landfill(s).

APPENDIX 3 – COMMUNITY CONSULTATION MEETINGS

Round 1 Consultation Community Meetings – Monday 25th November 2024 in Balranald, and Tuesday 26th November 2024 in Euston.

- Monday 25th November 2024 in Balranald – held at the Balranald Senior Citizens Centre, Market Street, Balranald.

  Number of attendees from the community: 2 persons
  Number of attendances from BSC and CT Management Group: 5 persons.

  The key discussion elements, although limited, were captured for inclusion in the Draft Waste Management Strategy document. The main points raised at the Community meeting by the attending ratepayers were:

  - Green waste recycling is needed
  - Tip shop – used to have one, would like the opportunity to repurpose waste
  - Rate structure – some ratepayers already struggling through cost of living
  - Cardboard recycling is occurring
  - Waste is an important community service
  - Food waste is going direct to the landfill
  - Would like a hard rubbish collection service to occur frequently
  - Recycling steel is supported
  - Supervision of waste disposal would assist in recycling efforts
  - Repurposing waste would be good to see to enhance sustainability.
  - Container Deposit Scheme (Return and Earn) system expansion is encouraged
  - Community service when it comes to waste is important.
  - Stewardship of waste management by Council is important.
  - Swap system – green waste in, compost out.
  - Community bins – multiple users.

  Options for many of the above elements included discussion around the viability, cost, and realistic nature of the scenarios for the BSC area.

  Note: an observation by CT Management Group from the session was that there is a need for a more comprehensive survey of the broader community to further the information BSC has on the desires of the community when it comes to waste management practices and future initiatives.

- Tuesday 26th November 2024 in Euston – held at the Old Euston Courthouse, Murray Terrace, Euston.

  Number of attendees from the community: 0 persons
  Number of attendances from BSC and CT Management Group: 3 persons.

  Given the non-attendance of any community members no notes were taken.

APPENDIX 4 – WASTE MANAGEMENT CONTRACTS

Waste Management Contracts

The following table provides a summary of best practice Waste Management contracts, not all applicable to BSC.

Service	Service Provider	Contract Expiry Date
Current services and contracts		
Residual garbage collection	BDS Automotive	TBC
Food and Garden organics processing	At landfill, contract shredding	N/A
Balranald landfill equipment hire	Details TBC	Details TBC
Metal processing	As above	As above
Mattresses	As above	As above
Tyres	As above	As above
Euston landfill operations Contract	Robinvale Waste	June 2025
Waste services to Council facilities	Details TBC	Details TBC
Medium priority introduction		
Food and Garden organics collection	N/A	N/A
Recycling collection	N/A	N/A
Garden organics processing	Details TBC	Details TBC
Public place recycling	Not in place	N/A
Public place residual	Not in place	N/A
Long term priority introduction		
Mixed recyclable processing	Not in place	N/A
Residual processing and disposal	Not in place	N/A
Clean up collection	N/A	N/A
Clean up processing and disposal	N/A	N/A
Street sweepings and illegal dumping disposal	Details TBC	Details TBC
Resale Shop	N/A	N/A

APPENDIX 5 – LGNSW 2024-25 ADVOCACY PRIORITIES

LGNSW's 2024-25 Advocacy Priorities identify the critical issues facing the local government sector (especially rural Council areas with very small populations), with the following priorities for FOGO being reiterated:

➢ Provide funding (over and above current funding) to offset council costs of implementing the Food Organics Garden Organics mandate and extend until 2035 the mandate for multi-unit dwellings. LGNSW recommendations are as follows:

- **Recommendation 1**: The NSW Government seek local government 'sense-check' of the draft mandate legislation before it is finalised.

- **Recommendation 2**: That the household mandate only apply to properties where a domestic waste management service charge is levied by council.

- **Recommendation 3**: That the household mandate does not apply to properties where a domestic waste management service charge is not levied by council.

  Exemptions
  The Proposal paper refers to the EPA having discretion to grant exemptions from the household mandate, whether generally or in specified circumstances, and whether from the entire mandate or certain parts of it. These exemptions could therefore be automatic (general) exemptions based on meeting certain criteria, or exemptions provided on application. Either way, it will be important to have clear criteria and rationale for the exemptions.

  A general exemption which local government recommends is the corollary to Recommendation 3 i.e. that properties where councils do not charge a domestic waste management charge should be exempt from the household mandate.

  The Proposal paper notes that other exemptions being considered are for **towns below a certain population size and density, and/or a certain distance from processing facilities in the non-regulated area**.

  Some rural properties may have a domestic waste service, but the residents may not need or want a FOGO service as they have onsite options such as composting or other options for the material. These properties may also be outside the urban footprint of a town and their inclusion in the service may significantly impact the overall viability of the service to that town.

  Given the intent of the mandate is to divert resources from landfill and reduce net greenhouse gas emissions, it may also be simpler and more effective to exempt these properties from the mandate and have council provide composting bins (for example) instead of a FOGO collection service.

  In short, councils must have the flexibility to determine the right service offering for the different types of housing and communities in their local government areas.

  Councils also must be given the ability to claim exemptions for properties or areas in certain situations including:

  - Contamination (property level) - some councils have a 3- or 4-strike policy for contamination in recycling bins which involves education, warnings and then removal of bin if contamination persists. Councils must be allowed to continue this approach under the mandate in a way that won't require them to seek individual exemptions each time they need to remove a bin. Councils must be given contamination management delegations that enable properties to be excluded from the mandate.

  - Contamination (community-level) - where councils can demonstrate likely causal factors for high contamination levels exist at a community level (for a defined community), councils should be able to seek an exemption from introducing a

FO/FOGO service. Councils could undertake a limited trial and then seek exemption(s) based on the outcome of the trial.

- Evidence of alternative solutions to manage FO/FOGO e.g. food dehydrators. If the intention is to divert organics from landfill, then evidence of a more effective / innovative process than FOGO service should support an exemption. This will also support FO/FOGO diversion from landfill where processing facilities are not available or difficult to access.

All of the above factors in varying combinations will have an influence on the viability of a FOGO service. For example, a town may be of sufficient density to make the collection viable, but the transport costs to the nearest facility make it unviable. Or there may be a facility within (say) 50km however it does not have capacity to take additional material nor any scope to increase its capacity.

As discussed above, some councils have already looked into the viability of FOGO services in their communities. Many local government areas are not large enough to generate enough waste to viably undertake FOGO processing themselves. Given council's knowledge of both the community and of the economics of providing a service, in the non-regulated area it may be simplest to allow councils to make the determination as to whether a FOGO service can be supported or exempt from the mandate.

- **Recommendation 4**: Automatically exempt properties that are not levied a domestic waste management charge by council from the household mandate.

- **Recommendation 5**: That councils be given the authority to exempt properties from the household mandate based on clearly defined criteria, such as where:

  - an education and compliance regime for contamination has resulted in bin removal,
  - alternative measures to manage FO/FOGO exist,
  - council has assessed and determined a FOGO service is not viable.

- **Recommendation 6**: The EPA work with local government to develop guidance on how exemptions may be applied (e.g. for rural areas, holiday rentals, properties without a domestic waste service etc).

- **Recommendation 7**: Councils should not be fined or penalised for not having FOGO collections in place by 1 July 2030 if they cannot access organic waste processing facilities / markets.

HEAD OFFICE – VICTORIA
10 – 12 Church Street
North Geelong VIC 3215
PO Box 1374
Geelong VIC 3220

Phone: 1300 500 932
Fax: 61 3 5221 2666
admin@ctman.com.au

QUEENSLAND
Suite 16 Capalaba Business Centre
39 Old Cleveland Road
PO Box 1057
Capalaba QLD 4157

Phone: 61 7 3390 1685
Fax: 61 7 3390 3909
queensland@ctman.com.au

NEW SOUTH WALES
Level 8, 66 Goulburn Street
Sydney NSW 2000

Phone: 1300 500 932
Fax: 61 3 5221 2666
admin@ctman.com.au

TASMANIA
PO Box 337
Newstead TAS 7250

Phone: 1300 500 932
Fax: 61 3 5221 2666
admin@ctman.com.au

www.ctman.com.au

ACN: 072 083 795
ABN: 15 072 083 795