

Banning exports of waste plastic, paper, glass and tyres

Submission

December 2019

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Summary of recommendations

The Local Government Association of South Australia (LGASA) understands the aims of the COAG waste export bans are for Australia to;

- contribute to positive international environmental outcomes;
- uphold Australia's international social responsibilities;
- create jobs through the development of onshore end markets for these materials; and
- to facilitate positive transition towards a more circular economy.

The LGASA makes the following recommendations to support the above aims of the COAG waste export bans;

1. That the Australian Government commits to undertaking a Regulatory Impact Statement to identify the impacts of the ban on all levels of government, industry and the community.
2. That requisite end markets for the materials subject to this ban are given further consideration in the development of the ban's timeframes;
3. That high-quality resources derived from waste product, that do not undermine the above aims and purposes of the COAG waste export ban should not be included in the definition of waste for the purpose of the COAG waste export ban;
4. That COAG acknowledges LGASA's request that the South Australian government freeze the solid waste levy for 2019-20 and beyond at its current level of \$110 a tonne for metropolitan councils and \$55 a tonne for regional councils;
5. That state and territory governments ensure greater hypothecation of solid waste levies to local government for worthwhile waste and resource recovery initiatives;
6. That all levels of government make appropriate investment in strategic waste and resource recovery infrastructure;
7. That the Australian Government develop a national accreditation system for circular use products;
8. That COAG recognise and address the need for increased levels of investment in improved regional waste and resource recovery practices; and
9. That the Australian Government implement packaging standards that consider existing waste packaging type end market capabilities.

1. Tell us about your organisation:

- a) *What does your organisation do? Which sector/material stream(s) are you involved in?*
- b) *Which part(s) of the supply chain are you involved in (e.g. producer, processor, supplier, transport, export or local government)?*
- c) *Where is your organisation based and across which state/territories does it operate? What is the size of your operation? For peak organisation, please provide details about the members you represent.*

About the LGA

The Local Government Association of South Australia (LGASA) is the voice of local government in South Australia representing all 68 councils across South Australia and the and the Anangu Pitjantjatjara Yankunytjatjara.

The LGASA is recognised in the *Local Government Act 1999* (SA) and is a constituent member of the Australian Local Government Association.

The mission of the LGASA is to provide leadership, support, representation and advocacy on behalf of all South Australian councils, for the benefit of the community. The LGASA also operates specific units/entities providing:

- public liability and professional indemnity cover for all South Australian councils;
- workers compensation cover for all South Australian council employees and associated local government bodies;
- asset cover for South Australia councils; and
- extensive education and training, procurement, online services and a research and development scheme.

This submission has been informed by existing policy positions and advocacy initiatives developed through consultation with our members and by roundtable discussions with waste industry leaders in South Australia.

Local government's waste management role

Local government plays an important role in waste management in South Australia through providing municipal waste and resource recovery services including facility management, ownership of landfills, transfer stations and Material Recovery Facilities, programs to increase recycling and resource recovery rates, acting to reduce waste disposed to landfill and leveraging procurement capacity to stimulate recycle "end market" development.

Councils also play a part in educating the community in relation to responsible waste management, in relation to the recycling of materials.

Local government makes a significant investment in the management of waste and recycling. The increased cost of waste management and recycling services has become one of the most difficult financial challenges for the local government sector in South Australia over the past 12-18 months.

Local government in South Australia has been proactive in responding to the transition to a circular economy and the challenges faced as a result of international waste import restrictions being adopted by China, Malaysia, India, Indonesia, Thailand and Vietnam. Some of the many actions undertaken by the LGASA and our membership include;

- Advocating for at least half of the revenue raised by the State Government through the solid waste levy to be made available to local government for worthwhile waste, recycling and resource recovery initiatives;
- Development of a state-wide local government waste action plan;
- Contributing to state government reforms including the Container Deposit Scheme (CDS) Review and advocating for wine bottle inclusion to the CDS;
- Nine councils “buying it back” by adopting circular procurement targets through the LGA’s Circular Procurement Pilot Project to leverage local government’s procurement capacity to encourage development of local, onshore end markets for recyclate in South Australia and Australia; <http://www.lga.sa.gov.au/buyingitback>
- Recent announcement of two new jointly owned local government Material Recovery Facilities to process kerbside recyclables; and
- Seven regional councils coordinating to develop the “Limestone Coast Region Waste and Resource Recovery Infrastructure Plan” to address specific regional waste management challenges.

Local government’s role in the policy development process

The LGASA notes that all three spheres of government have been active in seeking to respond to the challenges faced by the recycling and resource recovery industry and, given that waste management falls to local government to implement, the LGASA has sought to ensure that the sector has a strong voice in these discussions. The LGASA has previously made submissions and given evidence to the following reviews:

- Australian Government development of the *2018 National Waste Policy: Less Waste, More Resources*¹ and, through the Australian Local Government Association, the *2019 National Waste Policy Action Plan*;
- South Australian Government reviews of Single-use Plastics and Container Deposit Scheme²
- Parliament of South Australia: Environment, Resources and Development Committee, Inquiry into the Recycling Industry³

The LGASA and its membership is committed to achieving waste management practices that are sustainable and contribute to the achievement of a circular economy. Councils are committed to working with local industry to reduce their reliance on overseas commodity markets and to develop sustainable waste management practices in South Australia.

¹ LGA, *Submission to Discussion Paper on updating National Waste Policy* (ECM 665962) October 2018.

² LGA, *Single-Use Plastics and the Container Deposit Scheme* (ECM 670813) February 2019.

³ LGA, *Parliament of South Australia- Inquiry into the Recycling Industry* (ECM 680408) July 2019.

The COAG waste export ban (“ban”) material streams that will likely have the most impact on local government’s kerbside waste operations in South Australia are plastic, paper and to a lesser extent glass. The LGASA is of the understanding that there are national markets for crumbed rubber and international markets for Tire-derived fuel. As tyres do not pose as great of an impact on local government as the other proposed material streams, the LGASA will not undertake further commentary around the impact of the ban on tyres.

The LGASA offers comment regarding the consultation process.

The Discussion Paper notes the COAG announcement of 9 August 2019 and the subsequent agreement of the Meeting of Environment Ministers on 8 November 2019. At the same meeting, the 2019 National Waste Policy Action Plan (Action Plan) was agreed and released. Target 1 of the Action Plan is to implement the export ban. Whilst the Action Plan includes a number of other actions that jurisdictions have agreed are critical in tackling the current problems in waste and recycling, there is no acknowledgement of the Action Plan and its commitments in the Discussion Paper. When considering submissions to the Discussion Paper, the Australian Government ought to consider to the content of the Action Plan.

Progressing other actions in the Action Plan will be critical to achieving the aims of the waste export ban. In particular, Action 1.5 requires the Australian Government to “use the Australian Recycling Investment Fund through the Clean Energy Finance Corporation to support manufacturing of recycled content products” by 2020. The LGASA believes the most appropriate use of these funds is to support the establishment of reprocessing and remanufacturing capabilities for mixed plastics and mixed paper products within Australia. Given the long lead-in times associated with establishing infrastructure of this nature, these funds should be made available immediately.

The LGASA also notes target 4 of the National Waste Policy Action Plan is to “significantly increase the use of recycled content by governments and industry”. Action 4.4 requires all governments to “devise specific procurement targets across all government procurement, with details about how the target will be calculated, achieved and audited” by 2020. Whilst this is vital work, the Action Plan does not establish a process to drive it and, without Australian Government leadership on this issue, it is unlikely that significant progress will be made in the required timeframes.

2. Impact on your organisation:

- a) *What will the COAG export ban mean for your members and day-to-day business operations?*

Recommendations

- 1. That the Australian Government commits to undertaking a Regulatory Impact Statement (RIS) to identify the impacts of the ban on all levels of government, industry and the community.***
- 2. That requisite end markets for the materials subject to this ban are given further consideration in the development of the ban’s timeframes.***
- 3. That high quality resources derived from waste product, that do not undermine the above aims of the COAG waste export ban, should not be included in the definition of waste for the purpose of the COAG waste export ban.***

The financial impacts of the ban on councils and their ratepayers will not be fully understood until a Regulatory Impact Statement (RIS) is completed. The LGASA recommends that a RIS is undertaken to identify and measure the financial and other impacts of the ban.

The LGASA believes that completion of a RIS will clearly demonstrate the need for government investment in infrastructure, and an increase in government procurement of recycled products, for the export ban to be viable.

The LGASA believes the ban's impact will vary considerably between South Australian councils. There is great diversity in the capacity and capability of waste and resource recovery infrastructure between metropolitan, rural, regional and remote locations.

The LGASA notes that South Australia has a relatively strong glass resource recovery industry and limited industry intervention in this area will be required to support the ban.

The LGASA does have concerns in relation to the ban, and its potential negative affect on the value proposition of the kerbside yellow recycling bin, particularly in relation to mixed plastic and unsorted paper/fibre.

To minimise the negative impacts of the ban on local government and the community in South Australia, the definition of waste (for the purpose of the ban) should not include high quality, environmentally and socially responsible commodities derived from waste that are exported internationally to legitimate end markets. The Commonwealth may need to undertake a regulatory role to ensure greater end-market transparency.

The LGASA notes an opportunity to develop onshore end markets for these valuable waste commodities, if given appropriate time. The LGASA recommends that the requisite end markets for materials subject to this ban are considered when developing the ban's timeframes.

The LGASA offers the following possible impacts to local government's day to day operations, noting the above recommendations and the support of both State and Commonwealth government for the ban's success:

- investment, coordination and construction (or the expediated construction) of waste and resource recovery infrastructure;
- waste and resource recovery contracts renegotiated and/or updated;
- communication and education of the community;
- alter/improve kerbside collection services;
- legislation reform, required to enable improved delivery of waste services to the community;
- employment of additional staff with appropriate knowledge and expertise;
- alter internal procurement practices to include considerations for recycled content (to leverage local government's procurement capacity);
 - Explore relationships with industry to trial new innovative products that contain recycled content;
 - Update internal procurement model documents; and
 - Train staff/undertake cultural change within council to ensure recycled content/circularity is considered in design and procurement practices.

b) If it results in a change to your business, what does that change look like?

If the proposed ban is coordinated with investment to develop and improve existing waste and resource recovery infrastructure, the development of on-shore recycle end market and a national accreditation system for circular use products (discussed further below) the ban could result in the following positive outcomes for local government:

- job creation;
- delivery of new educational programs that promote resource recovery;
- downward pressure on council rates;
 - reduced waste sent to landfill and therefore reduced landfill management costs for councils;
 - reduced waste levies paid by councils on waste that is not recovered;
- transition towards a circular economy;
- development of onshore end markets for recycle, reducing local government's exposure to changing international commodity markets;
 - new income streams for recovered waste;
 - Strengthening and creating new local business and communities; and
- lower kerb side contamination as a result of improved community education

However, if the ban includes legitimate waste commodities exported internationally and is considered in isolation of requisite industry, infrastructure, market and other development, the LGASA believes the proposed ban will negatively impact local government's ability to provide high quality waste and resource recovery services to the South Australian community.

The possible ramifications of the ban may reflect the negative experiences local government in South Australia (and Australia) endured after the implementation of the China National Sword policy. The ramifications could include;

- increased stockpiling/landfilling of waste resources;
- further increases in recyclables processing costs;
- interruptions/termination of kerbside collection (like issues experienced as a result of SKM closure);
- dishonoured contracts with subcontractors;
- inadequate staffing levels and staff education;
- increased costs for transport of regional sorted materials to MRFs with capacity;
- higher waste levy payments and greater pressure on council rates; and
- undermined commercial viability of council owned MRFs

c) Will these changes require your business to invest? If so, what is the approximate dollar value of the investment? What would be the main focus of this investment (for example, new infrastructure or hiring new staff)? What is this investment expected to result in (for example, increased capacity from X to Y, new products being developed)?

The LGASA is not able to provide a dollar value estimate as the size of required investment will vary considerably between councils.

Instead, the LGASA offers the below information on recent local government waste and resource recovery infrastructure investment plans:

- Two new local government owned and run MRFs, one costing approximately \$12.8million and the other around \$21 million to construct;
- Facility upgrades to an existing council owned MRF to improve glass fines recovery costing around \$1.17 million; and
- The Limestone Coast Region Waste and Resource Recovery Infrastructure Plan⁴ recommends the Limestone Coast Region invest \$4.3 million in waste and resource recovery infrastructure investment over the next ten years to upgrade and expand existing municipal waste and resource recovery.⁵
 - The LGASA wishes to highlight that this figure does not consider increasing demand for recyclables through council procurement, key partnerships with other organisations to help drive new initiatives or the COAG waste export ban timeframes.

Investment in waste and resource recovery infrastructure will result in improved capacity to recover higher quality resources from waste. The availability of waste resources will in turn guide industry innovation.

Finally, if the ban occurs in isolation of necessary industry and infrastructure development, the investment for local government will be substantially increased, as experienced post China National Sword. In 2018, the LGASA commissioned an independent market analysis of South Australian recyclables, that revealed the immediate additional cost to councils to process kerbside waste in the wake of the China national sword international recycling market collapse was an additional \$8.8 million annually.

d) Are there any impediments to investment and how can these be overcome?

Recommendation

4. That COAG acknowledges LGASA's request that the South Australian government freeze the solid waste levy for 2019-20 and beyond at its current level of \$110 a tonne for metropolitan councils and \$55 a tonne for regional councils

The South Australian 2019-20 State Budget created additional uncertainty in the South Australian waste management sector after announcing a sudden 40% increase to the Solid Waste Levy.

The timing of this notice did not allow businesses and local government (with budgets locked in for 2019-20) to prepare for this additional cost.

⁴ Limestone Coast Local Government Association, *Waste Management* < <http://www.lcga.sa.gov.au/strategic-activities/environmental-sustainability/waste-management> >.

⁵

This announcement created further uncertainty and placed additional financial strain on local government and the waste industry in South Australia at a time where it was trying to navigate a fragile market that was yet to stabilise from the recent recycling crisis.

While local government supports government action that promotes resource recovery and market development, it acknowledges that transition to a circular economy is not assisted by drastic increases to landfill levies.

Recommendations

- 5. That state and territory governments ensure greater hypothecation of solid waste levies to local government for worthwhile waste and resource recovery initiatives.**
- 6. That all levels of government make appropriate investment in strategic waste and resource recovery infrastructure.**

Waste and resource recovery infrastructure require upgrades and transformation for South Australia to successfully respond to the ban.

In 2018/19 it is estimated that local government in South Australia contributed \$42.5 million towards the Solid Waste Levy. It is estimated that local government in South Australia will contribute approximately \$185 million to the solid waste levy over the next four years.

Conversely, under current state government commitments, councils will only receive back a share of \$2.5 million over the next four years in an annual grant program funded by monies collected through the Solid Waste Levy.

The funds collected through the Solid Waste Levy and accumulated within the Green Industry Fund could play a very significant role in further securing South Australia's position as a leader in the circular economy and generating new industries and employment opportunities.

At least half of the revenue raised by the State Government through the solid waste levy should be made available to local government for worthwhile waste, recycling, resource recovery and circular economy initiatives.

Recommendation

- 7. That the Australian Government develop a national accreditation system for circular use products.**

One of the federal government responses to the international recyclables end market collapse is to leverage government procurement power to help develop onshore end-markets for Australian recycle.

The LGASA supports this response through the pilot project on the adoption of circular procurement targets by councils.

A clear barrier that local government in South Australia has experienced during procurement attempts is navigating the lack of transparency around products containing recycled content.

It is necessary to consider the difference between products and materials that are "infinitely recyclable" and products and materials that can be re-used in another product but once that single re-use has occurred the product or material then reverts back to being a linear-use product that, at end of life, will be disposed to landfill.

There are many examples of this type of "recycling" in the market and there may be a need for better or more specific definitions of terms such as "recyclable" and "recycled".

Additionally, it is often difficult to establish the originating location of recycle contained in goods.

The transparency of the market needs to be improved on a national scale to provide greater clarity and facilitate increased procurement of recycled content and to successfully transition towards a circular economy.

Recommendation

8. That COAG recognise and address the need for increased levels of investment in improved regional waste and resource recovery practices.

Significant investment into improved waste management infrastructure and practice in regional South Australia is necessary to overcome the tyranny of distance and to achieve economies of scale to maximise resource recovery and transition towards a more circular economy.

Recent state government investment and policy interventions to improve waste management practices and transition to a more circular economy have generally been more focused on metropolitan South Australia.

It is important to note that waste management in regional South Australia may require a different approach to that of metropolitan South Australia. Understanding the need, capacity and challenges of communities is necessary to identify and capitalise on areas of circular investment opportunity.

Finally, planning and coordination transcending council boundaries may be required to ensure the correct infrastructure is in the ideal location and economies of scale can be achieved to make resource recovery financially viable.

Recommendation

9. That the Australian Government implement packaging standards that consider existing waste packaging type end market capabilities.

The LGASA notes that historically Australia has placed too much emphasis on the “back end” of waste management and not enough on the “front end”, namely what goes into the bin in the first place.

The LGASA supports the development of packaging standards to remove linear-use (single use) products and enable greater, Australian market focused, resource recovery.

The LGASA notes the historic COAG and Australian Packaging Covenant Organisation (APCO) packaging targets that are due to come into effect by 2025. The LGASA acknowledges these packaging standards will encourage circular-use products and that they will alter the composition of kerbside waste and recycling bins.

The LGASA recommends that the packaging standards consider the impact on waste and recycling collection and processing systems. Consideration to existing waste packaging type end market capabilities needs to be considered to progress towards a circular economy and to avoid placing further pressure on the waste and resource recovery industry.

e) Could these changes create jobs in your business? If so, approximately how many?

The LGASA notes that the changes may require significant investment in infrastructure and staff for local government however the required investment will vary considerably between councils. There is great diversity between resource recovery capability between metropolitan and regional councils and remote locations. The LGASA again notes the two planned council owned MRF's that are planned to be built in South Australian.

Further the LGASA notes European studies demonstrate the positive impact of the transition towards a circular economy on job creation.⁶

f) What are the other challenges and/or opportunities for your business/industry as a result of the export ban?

The LGASA recommends the timing for the ban of each material stream to be reviewed and informed by an understanding of the material's requisite end market.

Without considering appropriate definitions that reflect the overarching purpose of the ban and the requisite material end markets, the proposed timeframe for this ban presents challenges for local government in South Australia. Significant investment into waste and resource recovery infrastructure, education of the community and legislative reform needs to be undertaken to avoid the ban causing perverse outcomes for local government and communities.

This ban may provide the following opportunities for local government in South Australia;

1. Increased Commonwealth and State government investment to develop local government waste and resource recovery infrastructure;
 - 1.1 Greater hypothecation of the waste levy to local government for worthwhile waste, recycling and resource recovery initiatives;
 - 1.2 Increased coordination and planning to help reduce traditional transport costs associated with waste and resource recovery;
2. Development of a national accreditation system, or national support for an existing accreditation system for circular use products procured by local government;
 - 2.1 Opportunities for all levels of government to collaborate with industry to develop and test innovative new goods and products containing recycled content;
3. South Australian Container Deposit Scheme (CDS) state government review to be expedited and CDS to be expanded to include other containers, including other forms of glass like wine bottles to further facilitate high quality resource recovery of coloured glass and reduce contamination in kerbside recycling bins; and the
4. Development and delivery of educational programs to improve waste literacy of the community.

3. The proposed definitions and timetable for implementing the COAG export ban are at Figure 2

a) Are there any additional waste plastic, paper, glass or tyre materials that should be included in the proposed timetable? Please detail why and in what circumstances.

At this time, the LGASA does not have any additional waste resources to be included in this ban.

⁶ International Institute for Sustainable Development "Estimating Employment Effects of the Circular Economy" September 2018.

b) Are there any waste plastic, paper, glass or tyre materials you consider should be excluded from the ban? Please detail why and in what circumstances.

As previously mentioned, the LGASA recommends waste commodities with legitimate international end markets that fulfil the overarching purpose of this ban are excluded from the definition of waste for the purposes of this ban.

There is a real risk, as exists for all waste resources included in this ban, that there will be no viable end market for these resources and stockpiling and landfilling of these resources will occur as a result. This would further impact the commercial viability of Australia's recycling system and increase instability in the sector.

c) How ready is local government to meet the proposed start dates for banning the exports of different types of waste plastic, paper, glass and tyres?

Local government in South Australia has been actively responding to the recycle end market collapse and transition to a circular economy for over 18 months.

Despite a proactive approach and leading the nation in waste resource recovery, the current lack of clear definitions for what materials are subject to this ban, timeframes and consideration for requisite end market opportunities create the risk of further recycle end market collapse like that experienced after the China National Sword policy was introduced.

The two newly announced MRF's in South Australia may not be operational when the ban initially comes into place, which would hinder metropolitan Adelaide's response to the bans. Significant investment into regional South Australia's waste and resource recovery infrastructure needs to occur for regional South Australia to improve its resource recovery and positively respond to the ban.

Further, local government in South Australia remains concerned about the lack of focus and funding for reprocessing and remanufacturing facilities for mixed plastic and mixed paper. In order to meet the timeframes for the ban, Australia must develop these capabilities in the next 18 months.

4. Industry and government actions:

a) What could industry do to help your business or sector to ensure the waste export bans are effective and adverse consequences are avoided? (Please be as specific as possible)

Industry could collaborate with government to help develop goods that are regularly procured by local government, that contain recycled content. Further, industry could collaborate in the ongoing testing and trialling of new products, so responsibility is more evenly shared between both government and industry.

b) What could government do to help your business or sector to ensure the waste export bans are effective and adverse consequences are avoided? (Please be as specific as possible.)

The LGASA notes earlier recommendations around the exclusion of high-quality waste commodities from the ban.

As discussed earlier, state government could invest more of the monies collected by the solid waste levy into worthwhile local government waste, recycling and resource recovery endeavours.

Generally increased investment into waste and resource recovery infrastructure across South Australia with a focus on strategically relevant and coordinated regional infrastructure would not only improve resource recovery rates and assist in avoiding adverse outcomes of the ban it would also help diversify industry regionally, in turn building the economic resilience of South Australian regions.

Federal and state government could incentivise investment into the development of new waste and resource recovery technology and strategically partner with manufacturers of goods containing recyclate to conduct joint research into the total life cycle impact of the product.

National harmonisation of road, infrastructure and other local government relevant specifications would support emerging technological advances and alter the perception that products containing recycled content are inferior.

The LGASA acknowledges how the well-established South Australian CDS helped to buffer the South Australian community from some of the adverse effects resulting from the China National Sword policy. The CDS waste resources are substantially more valuable than other materials received by MRFs. The income MRFs received from these CDS materials cross-subsidised the recycling of other materials during the market collapse.

Recovered glass is a high value material in South Australia if recovered in a “clean state”. There are existing strong local markets for recovered glass within South Australia. Further, glass (when disposed through the yellow bin) is responsible for a significant amount of contamination of kerbside recyclables. Expanding the CDS to include other forms of glass, including wine bottles, would facilitate greater resource recovery of high quality recovered coloured glass in South Australia and could help reduce kerbside recycling contamination rates.

This would buffer the South Australian community, and local government, from potential negative impacts and unintended outcomes resulting from the proposed waste export bans.

Government could establish an accreditation system or endorse the national use of an existing accreditation system for circular use products (both recycled and recyclable) to guide industry in new best practices requirements.

During the transition government could help subsidise smaller manufacturers of circular use products to gain the appropriate accreditation. Conversely, the LGASA has evidence to suggest that goods containing recycled content cost (financially) more than other goods (for example crumbed rubber road base is more expensive than more traditional forms of road base). Federal or state government, during the transition and initial development of the Australian market, could subsidise local government for the cost difference between circular goods and services and more traditional goods and services to enable greater procurement of these goods.

c) What actions can industry and governments (Commonwealth, state, territory and local) take to drive demand for the use of recycled materials?

All levels of government could adopt circular procurement targets to leverage government procurement capacity.

Commonwealth government could develop/direct the use of a national goods accreditation system to support government procurement of recycled content goods.

5. What do you consider is the largest barrier to improving waste management and recycling in Australia?

1. Lack of focused, commensurate, ongoing investment from federal and state government to local government for worthwhile waste management and resource recovery endeavours.
2. Placing too much emphasis on the “back end” of waste management and not enough on the “front end”, namely what goes into the bin in the first place. Developing packaging standards would remove linear-use (single use) products and enable greater, Australian market focused, resource recovery.
3. Lack of unified national accreditation system for “circular use” products.

6. Please provide any further information relevant to implementing the export bans.

The LGASA has no further comments at this stage.



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