

His Worship the Mayor
Councillors
City of Marion

Notice of General Council Meeting

Council Chamber, Council Administration Centre
245 Sturt Road, Sturt

Tuesday, 28 January 2025 at 6.30 pm

The CEO hereby gives Notice pursuant to the provisions under Section 83 of the *Local Government Act 1999* that a General Council Meeting will be held.

A copy of the Agenda for this meeting is attached in accordance with Section 83 of the Act.

Meetings of the Council are open to the public and interested members of this community are welcome to attend. Access to the Council Chamber is via the main entrance to the Administration Centre on Sturt Road, Sturt.



Tony Harrison
Chief Executive Officer

1 OPEN MEETING	4
2 KAURNA ACKNOWLEDGEMENT	4
3 DISCLOSURE	4
4 COUNCIL MEMBER DECLARATION OF INTEREST (IF ANY)	4
5 CONFIRMATION OF MINUTES	4
5.1 Confirmation of Minutes of the General Council Meeting held on 10 December 2024	4
6 COMMUNICATIONS	19
6.1 Elected Member Verbal Communications	19
6.2 Mayoral Communication Report	19
6.3 CEO and Executive Communication Report	20
7 ADJOURNED ITEMS - NIL	22
8 DEPUTATIONS - NIL	22
9 PETITIONS - NIL	22
10 COMMITTEE RECOMMENDATIONS	22
10.1 Confirmation of Minutes of the Finance, Risk and Audit Committee Meeting held on 17 December 2024	22
11 CONFIDENTIAL ITEMS	34
11.1 Cover Report - Seacliff Golf Management Agreement	34
11.2 Cover Report - Southern Soccer Facility Pitch 4 Additional funding	35
12 CORPORATE REPORTS FOR DECISION	36
12.1 Final draft submission - Waste to resources EPP Policy	36
12.2 Public Art Strategy - Interim Report	66
12.3 LGA Ordinary General Meeting 2025 - Call for Items of Business	67
13 CORPORATE REPORTS FOR INFORMATION/NOTING	77
13.1 Monthly Work Health and Safety Report	77
13.2 Finance Report - December 2024	81
14 WORKSHOP / PRESENTATION ITEMS - NIL	94
15 MOTIONS WITH NOTICE	94
16 QUESTIONS WITH NOTICE	94

17 MOTIONS WITHOUT NOTICE	94
18 QUESTIONS WITHOUT NOTICE.....	94
19 OTHER BUSINESS	94
20 MEETING CLOSURE	94

2 Kaurna Acknowledgement

We acknowledge the Kaurna people, the traditional custodians of this land and pay our respects to their elders past and present.

3 Disclosure

All persons in attendance are advised that the audio of this General Council meeting will be recorded and will be made available on the City of Marion website.

4 Council Member Declaration of Interest (if any)

5 Confirmation of Minutes

5.1 Confirmation of Minutes of the General Council Meeting held on 10 December 2024

Report Reference	GC250128R5.1
Originating Officer	Business Support Officer - Governance and Council Support – Cassidy Mitchell
Corporate Manager	Manager Office of the Chief Executive – Sarah Vinall
General Manager	Chief Executive Officer – Tony Harrison

RECOMMENDATION

That the minutes of the General Council Meeting held on 10 December 2024 be taken as read and confirmed.

ATTACHMENTS

1. G C 241210 - Final Public Minutes [**5.1.1** - 14 pages]



**Minutes of the General Council Meeting
held on Tuesday, 10 December 2024 at 6.30 pm
Council Chamber, Council Administration Centre
245 Sturt Road, Sturt**

**PRESENT**

His Worship the Mayor Kris Hanna

Councillor Joseph Masika

Councillor Nathan Prior

Councillor Raelene Telfer

Councillor Luke Naismith

Councillor Jason Veliskou (from 6.35pm)

Councillor Sarah Luscombe

Councillor Jayne Hoffmann

Councillor Matt Taylor

Councillor Renuka Lama (from 6.36pm)

Councillor Jana Mates

Councillor Amar Singh

Councillor Ian Crossland

In Attendance

Chief Executive Officer - Tony Harrison

General Manager City Services - Angela Allison

General Manager Corporate Services - Tony Lines

General Manager City Development - Ben Keen

Chief Financial Officer - Ray Barnwell

Manager People and Culture - Kate McKenzie

Governance Officer - Amey Johnson

1 Open Meeting

The Mayor opened the meeting at 6.30pm.

2 Kurna Acknowledgement

We acknowledge the Kurna people, the traditional custodians of this land and pay our respects to their elders past and present.

3 Disclosure

All persons in attendance are advised that the audio of this General Council meeting will be recorded and will be made available on the City of Marion website.

4 Council Member Declaration of Interest (if any)

Nil



Moved Councillor Telfer

Moved Councillor Hoffmann

That the following items be moved en bloc

- Confirmation of Minutes of the Special General Council Meeting held on 19 November 2024
- Confirmation of Minutes of the General Council Meeting held on 26 November 2024

Carried Unanimously

5 Confirmation of Minutes

5.1 Confirmation of Minutes of the Special General Council Meeting held on 19 November 2024

Report Reference GC241210R5.1

Moved Councillor Telfer

Seconded Councillor Hoffmann

That the minutes of the General Council Meeting held on 26 November 2024 be taken as read and confirmed.

Carried Unanimously

5.2 Confirmation of Minutes of the General Council Meeting held on 26 November 2024

Report Reference GC241210R5.2

Moved Councillor Telfer

Seconded Councillor Hoffmann

That the minutes of the General Council Meeting held on 26 November 2024 be taken as read and confirmed.

Carried Unanimously

Moved Councillor Prior

Moved Councillor Taylor

That the following items be moved en bloc

- Cover Report – Adjourned – Revocation of Community Land Process – Edwardstown
- Cover Report – Tonsley Unsolicited Proposal
- Cover Report - Nungamoora

Carried Unanimously

6 Adjourned Items

6.1 Cover Report - Adjourned - Revocation of Community Land Process – Edwardstown

GC241210 - General Council Meeting - 10 December 2024



Report Reference	GC241210F6.1
------------------	--------------

Moved Councillor Prior**Seconded Councillor Taylor**

1. Pursuant to Section 90(2) and (3)(b) of the Local Government Act 1999, the Council orders that the public be excluded from attendance at that part of this meeting relating to Agenda Item GC241210F6.1 Revocation of Community Land Process – Edwardstown, except the following persons: Chief Executive Officer, Manager People and Culture, General Manager City Development, General Manager City Services, General Manager Corporate Services, Chief Financial Officer, Manager City Property, Unit Manager Property and Facilities, Team Leader Property, Property Officer, Governance Officer and Media and Engagement Adviser, to enable the Council to consider Item GC241210F6.1 in confidence on the basis the Council considers it necessary and appropriate to act in a meeting closed to the public (excepting those persons listed above) in order to receive, discuss or consider in confidence the following information or matter relating to Item GC241210F6.1 as its disclosure of information could reasonably be expected to prejudice the commercial position of the person who supplied the information.
2. Notes the disclosure of this information would, on balance, be contrary to the public interest because the details relate to commercial information of a confidential nature of which could reasonably be expected to prejudice the commercial position of the person who supplied the information.
3. Determines, on this basis, the principle that meetings of the Council should be conducted in a place open to the public has been outweighed by the need to keep consideration of the information or matter confidential.

Carried Unanimously

6.32pm the meeting went into confidence

Moved Councillor Mates**Seconded Councillor Hoffmann**

That Council:

1. Pursuant to section 91(7) of the Local Government Act 1999, orders that the following document(s) relating to Agenda Item - GC241210F6.1 - Adjourned - Revocation of Community Land Process – Edwardstown shall be kept confidential, except when required to effect or comply with Council's resolution(s) regarding this matter, being document(s) relating to a matter dealt with by the Council on a confidential basis under sections 90(2) and 90(3)(b) of the Act:
 - Report - Adjourned - Revocation of Community Land Process – Edwardstown
 - Attachment 1 – GC20240723F11.1 Revocation of Community Land Process Edwardstown
 - Attachment 2 – GC240827F7.1 – Adjourned – Revocation of Community Land Process – Edwardstown
 - Attachment 3 – 24 MDIS 0301 – Response from Minister Cook – Marion Mayor
 - Attachment 4 – Letter to Executive Director, Department of Human Services dated 15 November 2024.
 - Minutes
 on the grounds that the document(s) relates to information the disclosure of which could reasonably be expected to prejudice the commercial position of Council.

GC241210 - General Council Meeting - 10 December 2024



2. Notes the disclosure of this information would, on balance, be contrary to the public interest because it could prejudice the commercial position of Council.
3. Determines this order shall operate until its revoked and will be reviewed every 12 months.
4. Pursuant to section 91(9)(c) of the Local Government Act 1999, delegates to the Chief Executive Officer the power to revoke this order in whole or part.

Carried Unanimously

6.33pm the meeting came out of confidence

7 Deputations - Nil

8 Petitions - Nil

9 Committee Recommendations - Nil

10 Confidential Items

10.1 Cover Report - Tonsley Unsolicited Proposal

Report Reference GC241210F10.1

Moved Councillor Prior

Seconded Councillor Taylor

1. Pursuant to Section 90(2) and (3)(d) of the Local Government Act 1999, the Council orders that the public be excluded from attendance at that part of this meeting relating to Agenda Item *GC241210F10.1 Tonsley Unsolicited Proposal*, except the following persons: Chief Executive Officer, General Manager Corporate Services, General Manager City Development, General Manager City Services, Chief Financial Officer, Manager People and Culture, Manager City Activation, City Activation Senior Advisor, Unit Manager Property and Facilities, Governance Officer and Media and Engagement Adviser, to enable the Council to consider the Item in confidence on the basis the Council considers it necessary and appropriate to act in a meeting closed to the public (excepting those persons listed above) in order to receive, discuss or consider in confidence the following information or matter relating to the Item: commercial information of a confidential nature (not being a trade secret) the disclosure of which could reasonably be expected to prejudice the commercial position of the person who supplied the information.
2. Notes the disclosure of this information would, on balance, be contrary to the public interest being information relating to the financial and commercial capability of an unsolicited proposal by a third party. The public interest in the Council being able to partner with third parties to provide facilities that benefit its area would be compromised as third parties would be discouraged from partnering with the Council if their confidential commercial information were disclosed.
3. Determines, on this basis, the principle that meetings of the Council should be conducted in a place open to the public has been outweighed by the need to keep consideration of the information or matter confidential.

Carried Unanimously

6.33pm the meeting went into confidence



6.35pm Councillor Veliskou entered the meeting

6.36pm Councillor Lama entered the meeting

Moved Councillor Prior

Seconded Councillor Luscombe

That formal meeting procedures be suspended to discuss the item.

Carried Unanimously

7.13pm formal meeting procedures suspended

7.49pm formal meeting procedures resumed

Moved Councillor Telfer

Seconded Councillor Prior

That Council:

1. Pursuant to section 91(7) of the Local Government Act 1999, orders that the following document(s) relating to Agenda Item *Tonsley Unsolicited Proposal*, shall be kept confidential, except when required to effect or comply with Council's resolution(s) regarding this matter, being document(s) relating to a matter dealt with by the Council on a confidential basis under sections 90(2) and 90(3)(d) of the Act,:
 - Report - Tonsley Unsolicited Proposal
 - Minutes – Tonsley Unsolicited Proposal
 - Electronic link – Draft Unsolicited Proposal
 - Attachment 1 – Locality Maps
 - Attachment 2 – Memorandum of Understanding
 - Attachment 3 – SAHT Ash Avenue Land Tenure
 - Attachment 4 – Proposed revocation of community land
 - Attachment 5 – Proposed community engagement report
 - Attachment 6 – Assessment and Risk Mitigation
 - Attachment 7 – Proposed timeline of unsolicited proposal

on the grounds that the document(s) relates to commercial information of a confidential nature (not being a trade secret) the disclosure of which could reasonably be expected to prejudice the commercial position of the person who supplied the information.
2. Notes the disclosure of this information would, on balance, be contrary to the public interest being information relation to the financial and commercial capability of an unsolicited proposal by a third party.
3. Determines this order shall operate for a period of 24 months; or until execution of a contract and will be reviewed every 12 months.
4. Pursuant to section 91(9)(c) of the Local Government Act 1999, delegates to the Chief Executive Officer the power to revoke this order in whole or part.

Carried Unanimously



7.57pm the meeting came out of confidence

10.2 Cover Report - Nungamoora

Report Reference GC241210F10.2

Moved Councillor Prior

Seconded Councillor Taylor

1. Pursuant to Section 90(2) and (3)(a, b and d) of the Local Government Act 1999, the Council orders that the public be excluded from attendance at that part of this meeting relating to Agenda Item GC241210F10.2 – Nungamoora except the following persons: Chief Executive Officer, General Manager City Development, General Manager City Services, General Manager Corporate Services, Manager People and Culture, Manager City Activation, Manager City Property, Manager Development and Regulatory Services, Unit Manager Planning & Development, Project Manager Infrastructure, Unit Manager Property and Facilities, Senior Urban Planner, Unit Manager Governance and Council Support, Governance Officer, and Media and Engagement Adviser, to enable the Council to consider the Item in confidence on the basis the Council considers it necessary and appropriate to act in a meeting closed to the public (excepting those persons listed above) in order to receive, discuss or consider in confidence the following information or matter relating to the Item: - information the disclosure of which could reasonably be private information.
2. Section 90(2) and (3)(a, b and d) Notes the disclosure of this information would, on balance, be contrary to the public interest because it includes private land valuation financial figures, consideration, or discussion of the information in public would, on the balance, be considered personal under privacy law.
3. Determines, on this basis, the principle that meetings of the Council should be conducted in a place open to the public has been outweighed by the need to keep consideration of the information or matter confidential.

Carried Unanimously

7.57pm the meeting went into confidence

Moved Councillor Prior

Seconded Councillor Luscombe

1. Pursuant to section 91(7) of the Local Government Act 1999, orders that the following documents relating to Agenda Item GC241210F10.2 – Nungamoora, shall be kept confidential, being document(s) relating to a matter dealt with by the Council on a confidential basis under sections 90(2) and 90(3)(a, b and d) of the Act:

Report – GC241210F10.2 – Nungamoora

Attachment 1 – GC241126F11.2 – Nungamoora - Concept and Design Options

Minutes - GC241210F10.2 – Nungamoora

on the grounds that document(s) relates to information concerning the personal information of personal addresses the disclosure of which could unreasonable being sensitive and are details of which are only known to those working on the project, the disclosure of which would be unreasonable, being information relating to the personal information of individuals and addresses and with whom the Council conducting business or would prejudice the commercial position of Council.



2. Sections 90(2) and 90(3)(a, b and d) of the Act notes the disclosure of this information would, on balance, be contrary to the public interest because it includes private land valuation financial figures, consideration, or discussion of the information in public would, on the balance, be considered personal under privacy law.
3. Determines this order shall operate for a period of 12 months and will be reviewed every 12 months if the confidentiality period is longer than 12 months in duration.
4. Pursuant to section 91(9)(c) of the Local Government Act 1999, delegates to the Chief Executive Officer the power to revoke this order in whole or part.

Carried Unanimously

8.02pm the meeting came out of confidence

8.03pm Councillor Telfer left the meeting
 8.03pm Councillor Prior left the meeting
 8.03pm Councillor Naismith left the meeting
 8.03pm Councillor Masika left the meeting

11 Corporate Reports for Decision

11.1 Review of Confidential Items Overview - 2024

Report Reference GC241210R11.1

Moved Councillor Mates

Seconded Councillor Hoffmann

That Council:

1. Notes it has reviewed and considered all items with a current confidentiality order;
2. Endorses the recommendations as detailed in Attachment 1;
3. Reviews all items with a remaining confidential order in or prior to December 2025.

Carried Unanimously

8.04pm Councillor Naismith re-entered the meeting

11.2 Final draft submission - Waste to resources EPP Policy

Report Reference GC241210R11.2

Moved Councillor Luscombe

Seconded Councillor Taylor

That Council:

1. Endorses the final draft submission to the EPA Discussion Paper on the review of the *Environment Protection (Waste to Resources) Policy 2010* (Attachment 2), subject to any



amendments made in the meeting.

8.06pm Councillor Telfer re-entered the meeting

8.06pm Councillor Masika re-entered the meeting

8.09pm Councillor Prior re-entered the meeting

Amendment

Moved Councillor Veliskou

Seconded Councillor Naismith

That Council:

1. Endorses the final draft submission to the EPA Discussion Paper on the review of the *Environment Protection (Waste to Resources) Policy 2010* (Attachment 2), subject to the removal of the reduction of weekly general waste collection and instead seek State Government funding for weekly green waste collection.

The amendment to become the motion was Carried

The motion as amended was Lost

11.3 Asset Management Plans - final endorsement

Report Reference GC241210R11.3

8.11pm Councillor Singh left the meeting

Moved Councillor Telfer

Seconded Councillor Hoffmann

That Council:

1. Endorses the City of Marion Transport Asset Management Plan (attachment 1).
2. Endorses the City of Marion Water Treatment and Resources Asset Management Plan (attachment 2).
3. Endorses the allocation of an additional \$3.589m identified in the Transport Asset Management Plan (Attachment 1) into the next Long-Term Financial Plan currently being prepared.

Carried Unanimously

8.14pm Councillor Singh re-entered the meeting

11.4 Scouts SA 1 Cumbria Court Lease

Report Reference GC241210R11.4

8.20pm Councillor Luscombe left the meeting



8.23pm Councillor Luscombe re-entered the meeting

Moved Councillor Telfer

Seconded Councillor Masika

That Council:

1. Rescinds the resolution from 24 September 2024 - GC240924R12.2 Scouts SA – 1 Cumbria Court Lease which states:

That Council:

1. *Notes that Development Approval has been granted to Scouts SA for its intended use of Cumbria Court.*
2. *Authorises the grant of a 5-year lease to Scouts SA of 1 Cumbria Court, Mitchell Park with a rent set at 7% of commercial rent (\$2,247.00 ex GST – plus outgoings per annum) in accordance with Council's Policy. The grant of the lease is to be subject to:*
 - a. *The Minister for Education consenting to a sub-lease of the portion of land leased from the Minister;*
 - b. *The Minister for Education consenting to a change in the permitted use contained in the lease for the leased land to accommodate for the proposed use by Scouts SA; and*
3. *Notes that Scouts SA will be responsible for all costs related to capital works and maintenance required for its use of the building during the lease arrangement.*
4. *Notes that the lease will be executed by Council staff using existing sub-delegations; and*
5. *Authorises the Mayor and Chief Executive Officer to affix the Common Seal of the Corporation of the City of Marion to any documentation required to give effect to the lease, sub-lease, grant of consent and change of permitted use by the Minister for Education.*

Moved Councillor Crossland

Seconded Councillor Naismith

That formal meeting procedures be suspended to discuss the item.

Carried

8.19pm formal meeting procedures suspended

8.20pm Cr Luscombe left the meeting

8.22pm Cr Luscombe re-entered the meeting

8.24pm formal meeting procedures resumed

Carried Unanimously

**Moved Councillor Telfer****Seconded Councillor Masika**

That Council:

1. Authorises the grant of a 5-year lease to Scouts SA of 1 Cumbria Court, Mitchell Park with a rent set at 14% of market rent (\$4,494.00 ex GST – plus outgoings per annum) in accordance with Council's Policy. The grant of the lease is to be subject to:
 - a. The Minister for Education consenting to a sub-lease of the portion of land leased from the Minister;
 - b. The Minister for Education consenting to a change in the permitted use contained in the lease for the leased land to accommodate for the proposed use by Scouts SA; and
2. Notes that Scouts SA will be responsible for all initial costs related to capital works required for its use of the building, with ongoing capital and maintenance responsibilities to be in accordance with the standard maintenance schedule (Attachment 1) utilised for Council's sporting and community organisation agreements.
3. Notes that the lease will be executed by Council staff using existing sub-delegations; and
4. Authorises the Mayor and Chief Executive Officer to affix the Common Seal of the Corporation of the City of Marion to any documentation required to give effect to the lease, sub-lease, grant of consent and change of permitted use by the Minister for Education.

The vote was tied

The Mayor made a casting vote and voted in favour of the motion

The motion was Carried

Councillor Crossland called for a Division

Those for: Councillors Masika, Telfer, Lama, Veliskou, Singh & Luscombe

Those against: Councillors Hoffmann, Taylor, Prior, Naismith, Mates, Crossland

The vote was tied

The Mayor made a casting vote and voted in favour of the motion

The motion was Carried

8.31pm Councillor Taylor left the meeting

11.5 ED Visitor Strategy

Report Reference

GC241210R11.5

Moved Councillor Mates**Seconded Councillor Prior**

That formal meeting procedures be suspended to discuss the item

Carried Unanimously



8.32pm formal meeting procedures suspended

8.34pm Councillor Taylor re-entered the meeting

8.35pm formal meeting procedures resumed

Moved Councillor Mates

Seconded Councillor Lama

That Council:

1. Endorses the Visitor Growth Strategy 2024-27 subject to the following amendments:

- Pg 2 Partnerships Key Actions: amend wording of first dot point to read 'Assess fees for in-kind support to partnering events: This may include waiver of fees for public land use and assist with logistical needs in situations where there's mutual benefit for organisers and City of Marion alike.'
- Pg 3 Partnerships Key Actions: amend wording of second dot point to read 'Offer Financial Contributions: Assess for minor funding for small-scale event costs that align with community priorities.'
- Amend the title to 'Events Strategy 2024-27'

Carried Unanimously

8.50pm Councillor Naismith left the meeting

8.53pm Councillor Naismith re-entered the meeting

11.6 Transport Strategy – City of Marion Submission

Report Reference GC241210R11.6

Moved Councillor Luscombe

Seconded Councillor Masika

That Council:

1. Endorses the attached draft submission (attachment 2) to the Transport Strategy to be sent to the Department for Infrastructure before close of consultation subject to the following amendments:

- Page 262 amend wording to change the title to 'Sustainability, net zero goals and reducing pollution'
- Page 260 amend wording to include 'Majors Road Precinct' and 'recreational activity'
- Page 261 amend wording to include 'deployment of small buses should be considered where appropriate'

Carried Unanimously

12 Corporate Reports for Information/Noting

Moved Councillor Hoffmann

Seconded Councillor Telfer

GC241210 - General Council Meeting - 10 December 2024



That the following Corporate Reports for Information/Noting be moved en bloc:

- Glandore Oval Redevelopment – Community Consultation Feedback
- SRWRA Board Meeting 18 November 2024 – Constituent Council Information Report
- Monthly Work Health and Safety Report

Carried Unanimously

12.1 Glandore Oval Redevelopment – Community Consultation Feedback

Report Reference GC241210R12.1

Moved Councillor Hoffmann

Seconded Councillor Telfer

That Council:

1. Notes the report

Carried Unanimously

12.2 SRWRA Board Meeting 18 November 2024 - Constituent Council Information Report

Report Reference GC241210R12.2

Moved Councillor Hoffmann

Seconded Councillor Telfer

That Council:

1. Notes the Constituent Council Information Report from SRWRA Board Meeting, 18th November 2024.

Carried Unanimously

12.3 Monthly Work Health and Safety Report

Report Reference GC21121012.3

Moved Councillor Hoffmann

Seconded Councillor Telfer

That Council:

1. Notes the report.

Carried Unanimously

13 Workshop / Presentation Items - Nil

**14 Motions With Notice****14.1 Glenthorne National Park****Report Reference** GC241210M14.1**Moved Councillor Mates****Seconded Councillor Naismith**

That the Mayor write to the Minister for Climate, Environment and Water expressing concerns and to request a briefing about the maintenance and general upkeep of Glenthorne National Park, particularly the community precinct, comprising the playground, carpark, picnic areas the Glenthorne creek and accessing the Changing Places toilet for visitors to the park living with a disability.

Carried Unanimously**15 Questions With Notice - Nil****16 Motions Without Notice****17 Questions Without Notice****18 Other Business****19 Meeting Closure**

The meeting was declared closed at 9.06pm.

CONFIRMED THIS 28 DAY OF JANUARY 2025

CHAIRPERSON

6 Communications

6.1 Elected Member Verbal Communications

In accordance with the *Code of Practice - Procedures at Council Meeting 2017/18* an Elected Member has the right to speak for up to two minutes in the second meeting of Council every second month from February (with the exception of caretaker period).

6.2 Mayoral Communication Report

Report Reference GC250128R6.2

Name of Council Member Mayor - Kris Hanna

Date	Event	Comments
21.11.24	Seaview High School Year 12 Graduation Ceremony	Attended and presented certificates
21.11.24	Re-installation of Ganesha at Hindu Temple	Attended
22.11.24	LGA AGM	Attended
22.11.24	Seaview High School Operation Flinders participants for 2024	Attended and presented certificates
23.11.24	Alumni Awards Gala hosted by Flinders University	Attended
25.11.24	City of Marion End of Year Business Event	Attended and gave speech
27.11.24	Southern Business Connections End of Year Celebration	Attended
29.11.24	Future Energy Week Flinders University	Attended and gave speech
29.11.24	Metropolitan Mayors Forum	Attended
30.11.24	Two Citizenship Ceremonies	Attended and presented certificates
30.11.24	Trott Park Christmas Party	Attended
02.12.24	Positive Ageing & Inclusion Volunteer Christmas Event	Attended and gave speech
03.12.24	Hallett Cove School 2024 Junior School Presentation Night	Attended and presented certificates
05.12.24	Tonsley View Club Christmas Lunch	Attended
05.12.24	Tonsley Connections Event	Attended
06.12.24	Dara School End of Year Celebration	Attended
07.12.24	Cooinda Neighbourhood Centre Christmas Party	Attended
07.12.24	Christmas Carols in Hendrie St Reserve	Attended and gave speech

09.12.24	Probus Club of Marion Christmas Function	Attended
09.12.24	Community Leadership Program Graduation Event	Attended and presented certificates
11.12.24	Active Elders Association Christmas Lunch	Attended
12.12.24	Opening of Salvo's store at Hallett Cove shops	Attended and gave speech
13.12.24	Mitchell Park Christmas Party	Attended
13.12.24	Lines Beauty Salon Opening & ribbon cutting	Attended
13.12.24	Glandore Neighbourhood Centre Volunteer Celebration	Attended
17.12.24	Rotary Club of Edwardstown Christmas Dinner	Attended
17.12.24	President of South Adelaide Basketball Association	Discussed Basketball Project
20.12.24	Met with staff to give thanks	-
01.01.25	Visited Warradale resident for 100 th birthday	Delivered card & gift (at own cost)
04.01.25	South Adelaide Malayalee Community Christmas Celebration	Attended
In addition, the Mayor has met with residents, MPs and with the CEO and Council staff regarding various issues		

6.3 CEO and Executive Communication Report

Report Reference GC250128R6.3

Date	Activity	Attended By
22 November 2024	Meeting City of Mitcham, City of Marion and Flinders University – MOU Signing	Ben Keen
22 November 2024	Tour Truck Ride Along with Cleanaway	Tony Lines
25 November 2024	Meeting Matt Pears, CEO, City of Mitcham	Angela Allison
25 November 2024	Meeting KPMG and CoM re Assurance Mapping Internal Audit Scoping	Tony Lines
26 November 2024	Drop-In Session Multicultural Plan	Tony Lines

29 November 2024	Meeting Blake Gordon - Brightly	Angela Allison
29 November 2024	Meeting Jin Woo Kim (ShineHub)	Angela Allison
29 November 2024	Drop-In Session Nepali Community Engagement – Multicultural Plan Cooida	Tony Lines
4 December 2024	Meeting re Utilities Optimisations with CCS and PAE	Tony Lines
6 December 2024	LG Professionals SA General Managers and Directors Network working group meeting	Ben Keen
11 December 2024	Meeting KPMG and CoM re Financial Controls Internal Audit Scoping	Tony Lines
12 December 2024	SRC JV Advisory Committee Meeting	Angela Allison
12 December 2024	Tonsley PCG Bi-Monthly Meeting	Ben Keen
16 December 2024	SMRF JV Advisory Committee Meeting	Angela Allison
19 December 2024	Meeting re Strategic Procurement Manager PD with CCS and PAE	Tony Lines
20 December 2024	Meeting Blake Gordon - Brightly	Angela Allison
8 January 2025	Graduate Working Group Program	Ben Keen
14 January 2025	Meeting Renewal SA	Ben Keen
17 January 2025	LG Professionals SA General Managers and Directors Network working group meeting	Ben Keen
21 January 2025	Meeting Cross Council Collaboration - Quantity Surveyors	Ben Keen
The communication report for the Chief Executive Officer will be provided with the 25 February 2025 General Council meeting agenda.		

7 Adjourned Items - Nil**8 Deputations - Nil****9 Petitions - Nil****10 Committee Recommendations****10.1 Confirmation of Minutes of the Finance, Risk and Audit Committee Meeting held on 17 December 2024**

Report Reference	GC250128R10.1
Originating Officer	Business Support Officer - Governance and Council Support – Cassidy Mitchell
Corporate Manager	Manager Office of the Chief Executive - Sarah Vinall
General Manager	Chief Executive Officer - Tony Harrison

REPORT OBJECTIVE

The purpose of this report is to facilitate the receiving and noting of the minutes of the Finance, Risk and Audit Committee meeting held on 17 December 2024.

EXECUTIVE SUMMARY

A summary of items considered by the Committee Members is noted below.

Reports for Discussion

- Internal Audit Plan 2023-2025
- Internal Audit Program – Implementation of Recommendations
- Work Program and Meeting Schedule for 2025
- Q1 Corporate Risk Report 2024-2025
- Strategic Risk Register
- Framework and Key Assumptions for the preparation of the 2025-2026 ABP and LTFP

Reports for Noting

- Annual Ombudsman Report 2023-24
- Council Member Report
- 1st Budget Review 2024-2025

RECOMMENDATION**That Council:**

1. **Receives and notes the minutes of the Finance, Risk and Committee meeting held on 17 December 2024.**
2. **Notes that separate reports will be brought to Council for consideration of any recommendations from the Finance, Risk and Audit Committee.**

ATTACHMENTS

1. FRA C 241217 - Final Minutes [**10.1.1** - 10 pages]



**Minutes of the Finance, Risk and Audit Committee
held on Tuesday, 17 December 2024 at 2.00 pm
Council Chamber, Council Administration Centre
245 Sturt Road, Sturt**



2

PRESENT

Josh Hubbard (Chair)
 Paula Davies
 Melissa Oors-L'Estrange
 Councillor Luke Naismith

In Attendance

Chief Executive Officer - Tony Harrison
 General Manager City Services - Angela Allison
 General Manager Corporate Services - Tony Lines
 Chief Financial Officer - Ray Barnwell
 Manager Office of the CEO - Sarah Vinall
 Manager People and Culture
 Unit Manager Governance and Council Support - Victoria Moritz
 Unit Manager Risk and Strategy
 Suhaas Madhyastha – KPMG
 Heather Martens – KPMG

1 Open Meeting

The Chair opened the meeting at 2.03pm.

2 Kurna Acknowledgement

We acknowledge the Kurna people, the traditional custodians of this land and pay our respects to their elders past and present.

3 Elected Member Declaration of Interest (if any)

The Chair asked if any member wished to disclose an interest in relation to any item being considered at the meeting

- Nil interests were disclosed.

4 Confirmation of Minutes

4.1 Confirmation of Minutes of the Special Finance, Risk and Audit Committee Meeting held on 11 November 2024

Report Reference FRAC241217R4.1

Moved Councillor Naismith

Seconded Mr Hubbard

That the minutes of the Special Finance, Risk and Audit Committee Meeting held on 11 November 2024 be taken as read and confirmed.

Carried Unanimously

FRAC241217 - Finance, Risk and Audit Committee - 17 December 2024



5 Business Arising

5.1 Business Arising Statement - Action Items

Report Reference FRAC241217R5.1

Moved Councillor Nasmith

Seconded Mr Hubbard

That the Finance, Risk and Audit Committee:

1. Notes the business arising statement, meeting schedule and upcoming items.

Carried Unanimously

6 Confidential Items – Nil

7 Reports for Discussion

7.1 Internal Audit Plan 2023-2025

Report Reference FRAC241217R7.1

Manager Office of the CEO introduced the item and provided a summary of the progress of the Internal Audit Program for 2023-2025.

Ms Heather Martens and Mr Suhaas Madhyastha from KPMG were present for the item.

Cloud Vendor / Third party

Ms Martens gave an overview of the Cloud Vendor / Third Party Assessment report noting:

- The audit found one high risk, 2 medium risks and 1 performance improvement opportunity. These findings relate to the management of third-party risks, roles and responsibilities not formally defined, acceptance of extended downtimes and contract management guidelines and plans.
- Across the board, there is an increasing focus on cloud environments with a need for robust frameworks.
- Scope includes assessing cloud vendors, risk management, governance, and contractual frameworks.
- The assessment included a deep dive into two contracts to understand risk management and controls.
- There are areas for improvement in how the City of Marion can mature its approach to third-party risk management of cloud vendor contracts in regard to formalised process, documentation, systems and monitoring.
- There needs to be a robust process in place to ensure ongoing checking to ensure controls are working effectively and meeting contractual arrangements.
- There is evidence of a strong Information Services team awareness and involvement in the contract renewal process, however improvement is needed in maintaining evidence of assessments and formal contract handovers for ongoing management.



- Roles and responsibilities have not been formally defined with potential risks including accountability issues and mismanagement.

The Committee provided the following feedback:

- Queried the process around data extraction and how we are ensuring control of extracted data as well as how this is housed by third parties. KPMG stressed the need for controlled access to data and clear processes to manage rights and amalgamation.
- The Committee discussed the previous data governance audit noting this assessment focussed on defining expectations to ensure user groups are receiving the insights to continue to evolve.
- Acknowledged the team's capabilities and level of technical expertise, however noted that challenges exist to maintain expertise as demands shift.
- The Committee recognised the challenge of managing complex contracts and the challenge of tracking actions to ensure success.
- The Committee emphasised the importance of aligning contracts with evolving needs and ensuring robust data governance.

Project Management Scope

Ms Martens provided a summary relating to the scope of the project management audit noting the purpose was to review the effective implementation of the recently implemented Project Management Framework (PMF) for capital delivery and ICT projects. The audit will assess whether the Framework is fit-for-purpose, aligned with better practices, and provides relevant insights from comparable organisations with a deep dive into two very different projects.

The Committee provided the following discussion:

- The Committee discussed the process of selecting the sample projects that were assessed and were comfortable with the criteria applied noting this was based on projects that have gone through the full project management cycle, were based on large complex projects and included feedback from Management.
- KPMG commented there were quite a few recommendations to be followed up from the previous audit with the review of projects for this audit assessed under the new Project Management Framework.
- Management noted an increased degree of robustness since the last audit, with higher levels of accountability under the new framework. There was also a potential risk of over-bureaucratising the process.

Assurance Mapping Scope

Ms Martens provided a summary of the Assurance Mapping Scope noting the purpose of the internal audit is to provide an updated assurance map for the City of Marion's sources of assurance across



the organisation's key strategic risks. This was an opportunity to review lines of defence across key areas.

The Committee noted the risks in scope for this internal audit and queried why high residual risks weren't included. KPMG noted that there was still an opportunity to include anything further, however Management confirmed there currently aren't any risks with a high residual rating.

Moved Ms Davies

Seconded Ms Oors-L'Estrange

That the Finance, Risk and Audit Committee:

1. Considers and provides feedback on the:
 - a. Cloud Vendor/Third Party Cyber Risks Assessment Report
 - b. Project Management Scope
 - c. Assurance Mapping Scope.

Carried Unanimously

7.2 Internal Audit Program - Implementation of Recommendations

Report Reference FRAC241217R7.2

The Committee noted the internal audit program and provided the following feedback:

- Discussed simplifying reports to clearly show progress while ensuring efficiency of effort in delivering reporting. An item of particular focus was, distinguishing between items "on track" and "off track." .
- Encouraged reviewing whether all findings need to remain on the report, as some are outdated or superseded. Suggested a thorough review and closure for low-risk items where decisions have already been made, a different approach taken or where that finding/risk is no longer relevant to the organisation.
- The Committee noted a preference for a summary dashboard showing key statistics and progress with an emphasis on high-risk over-due actions and a short summary of closed items.
- The Committee discussed how risk ratings and closure targets are presented and the need to focus on older findings.
- It was noted the procurement oversight committee had not yet convened. However, the Terms of Reference are complete, and membership determined. The Strategic Procurement Manager position, a key resource on the Committee is currently vacant. The Committee will meet once this role is finalised.
- The Committee queried Action J1 from the Collaborative Contract Value for Money Audit in relation to the \$450,000 threshold referenced for all new contracts and the requirement to have a contract management plan. This was taken on notice with management to provide a response out of session.



6

- The Committee suggested this was a good opportunity to bring a report with a revised format to the next meeting and agreed that measuring quarterly progress would be a valuable addition moving forward.

ACTION: Management to provide a response to the question in relation to how the \$450k is selected for the cutoff where all contracts in excess of this amount have Contract Management Plans in place.

ACTION: Review format of current report and bring a revised version to the next Committee meeting.

Moved Ms Davies

Seconded Councillor Naismith

That the Finance, Risk and Audit Committee:

1. Reviews and provides feedback on the Internal Audit Program (Attachment 1).

Carried Unanimously

7.3 Work Program and Meeting Schedule for 2025

Report Reference FRAC241217R7.3

Moved Ms Oors-L'Estrange

Seconded Councillor Naismith

That the Finance, Risk and Audit Committee:

1. Notes the proposed work program for 2025 identified at Attachment 1 to the report.
2. Adopts the following schedule of meetings for 2025:
 - a) Tuesday 18 February 2025 (4pm – 6pm)
 - b) Tuesday 8 April 2025 (4pm – 6pm)
 - c) Tuesday 3 June 2025 (4pm – 6pm)
 - d) Tuesday 12 August 2025 ((4pm – 6pm) followed by a joint workshop with Council from 6.30pm)
 - e) 14 October 2025 ((4pm – 6pm)
 - f) 2 December 2025 ((4pm – 6pm)

Carried Unanimously

7.4 Q1 Corporate Risk Report 2024-2025

Report Reference FRAC241217R7.4

Unit Manager Risk and Strategy introduced the item commenting this report provided an opportunity to share some of the activities the teams will be undertaking over the next 12 months.

The Committee noted the report and provided the following feedback:

FRAC241217 - Finance, Risk and Audit Committee - 17 December 2024



7

- Committee queried a potential conflict of interest given KPMG's dual role as internal auditor and involvement in risk management practices. Management confirmed they are comfortable with the approach and noted there was limited tender responses. The work is funded by LGRS using the risk management rebate and will be complete by 30 June 2025.
- The Committee emphasised the importance of ensuring practical outcomes from the maturity assessment that can deliver long-term benefits and be effectively implemented.
- The Committee discussed potential impacts of the recent state by-election on priorities and infrastructure. Management indicated there were no significant changes, with expectations of more developments closer to the 2026 state election.
- The Committee discussed service delivery provided by volunteers. Management acknowledged a national decline in volunteer availability, noting a potential overreliance on the same individuals.
- Despite this, services remain stable with close to 300 volunteers. Positive feedback indicates volunteers are generally happy, though risks exist around underutilisation of skills.
- Management will continue to work on strategies to adapt to the changing volunteer environment, focusing on re-engagement and improving skill-to-task alignment.
- The Committee discussed critical risks and controls and queried whether certain individuals were burdened with too many critical controls. Management confirmed the issue had been recently discussed and committed to review control assignments and hierarchy. Efforts will focus on simplifying and reducing the scope through the controlled library in Pulse (Risk Management Software).

Moved Councillor Naismith

Seconded Ms Oors-L'Estrange

That the Finance, Risk and Audit Committee:

1. Reviews the Corporate Risk Register Report and provide any feedback.
2. Considers the high risks in **Attachment 1** and provides feedback.

Carried Unanimously

7.5 Strategic Risk Register

Report Reference FRAC241217R7.5

Unit Manager Strategy and Risk introduced the item commenting the Committee last reviewed the Strategic Risk Register in February 2024. Since then, the Executive Leadership Team completed its bi-annual review, aligning risks with the Strategic Plan 2024-2034 and updating risk descriptions to address emerging sector-wide risks.

- The Committee commended the comprehensive analysis and sophisticated benchmarking approaches and noted excellent maturity in the process.
- Staff highlighted additional areas they felt were missing, including leveraging emerging technologies and addressing challenges in attracting skilled staff. These will be removed from the corporate risk register and elevated to the Strategic Risk Register.

FRAC241217 - Finance, Risk and Audit Committee - 17 December 2024



Moved Ms Davies

Seconded Councillor Naismith

That the Finance, Risk and Audit Committee:

1. Notes and provides feedback to the Strategic Risk Register.

Carried Unanimously

7.6 Framework and Key Assumptions for the preparation of the 2025-2026 ABP and LTFP
Report Reference FRAC241217R7.6

The Chief Finance Officer introduced the item and provided a summary of the proposed framework in setting the 2025-2026 Annual Business Plan (ABP) & Long-Term Financial Plan (LTFP) and a summary of the process supporting the review of financial parameters and key budget assumptions.

The following discussion and feedback were noted:

- The ABP and LTFP process has commenced, noting the budget bid deadline for staff closed on 26 November.
- The Framework aligns funding approved in the Asset Management Plans (AMP's) with the LTFP and aims to maintain a break-even position or positive cash position to ensure long term financial sustainability.
- Modelling for rate rises and implications will be discussed with Council Members at the January 2025 Planning Day.
- City of Marion is currently and historically operating with minimal debt, however as planned over the next 10-years borrowings are projected to increase from the end of this financial year. There are continued efforts to manage cash flow tightly and defer borrowings until they are required.
- Key challenges discussed include balancing average rate increases while addressing rising costs including capital works, maintaining the existing high level of service delivery and potential increase in wages resulting from the current EB agreement negotiations.
- The committee queried reliance on CPI given it may understate council cost drivers. Management acknowledged CPI is household-focused but widely used, noting there are other indexation considerations and measures such as LGPI for example.
- Management commented that borrowings in the adopted LTFP are forecast to peak at \$52m. As the next iteration of the LTFP is developed adjustments will be made to accommodate updated project timelines and deferred borrowings to date.
- The Committee suggested the annual joint workshop in August could be used to feed into the future budget processes.
- The committee highlighted the importance of robust conversations on service levels, funding priorities, and value delivery, with a focus beyond percentage increases to the actual financial impact for households.

FRAC241217 - Finance, Risk and Audit Committee - 17 December 2024



9

Moved Ms Davies**Seconded Councillor Naismith**

That the Finance, Risk and Audit Committee:

1. Provide feedback on the proposed framework, key assumptions, and associated risks in setting the Annual Business Plan for 2025-2026 and the Long-Term Financial Plan.
2. Provide feedback on the Environmental Scan (Attachment 3) as input into the Draft ABP 2025-2026 and draft LTFP.

Carried Unanimously**8 Reports for Noting****8.1 Annual Ombudsman Report 2023-24**

Report Reference	FRAC241217R8.1
-------------------------	----------------

Moved Councillor Naismith**Seconded Ms Oors-L'Estrange**

That the Finance, Risk and Audit Committee:

1. Notes the report.

Carried Unanimously**8.2 Council Member Report**

Report Reference	FRAC241217R8.2
-------------------------	----------------

Moved Councillor Naismith**Seconded Ms Davies**

That the Finance, Risk and Audit Committee:

1. Notes this report.

Carried Unanimously**8.3 1st Budget Review 2024-2025**

Report Reference	FRAC241217R8.3
-------------------------	----------------

The Chief Finance Officer introduced the report and provided a summary of the item commenting that the first budget review addresses carry over items. It was noted that assets have been independently valued, requiring depreciation adjustments. It is anticipated that the requirement for borrowings will be reassessed closer to the 3rd quarter review.

- The Committee queried the carryover process with Management confirming there due to the nature of council projects there will always be a level of carryovers resulting from a variety of factors including grant funded projects, delays in capital programs and scheduling.



10

- Management also clarified for the new committee members that the budgeted financial statements reflect year to date actuals and a reforecast for the remainder of the financial year.

Moved Councillor Naismith**Seconded Ms Davies**

That the Finance, Risk and Audit Committee:

1. Notes the 1st Budget Review position

Carried Unanimously**9 Workshop / Presentation Items – Nil****10 Other Business – Nil****11 Meeting Closure**

The meeting was declared closed at 3.37pm.

CONFIRMED THIS 18 DAY OF FEBRUARY 2024

CHAIRPERSON

11.1 Cover Report - Seacliff Golf Management Agreement

Report Reference	GC250128F11.1
Originating Officer	Business Support Officer - Governance and Council Support – Cassidy Mitchell
Corporate Manager	Manager City Property - Mark Hubbard
General Manager	General Manager City Development - Ben Keen

REASON FOR CONFIDENTIALITY

Local Government Act (SA) 1999 S 90 (2) 3

(b) information the disclosure of which (i) could reasonably be expected to confer a commercial advantage on a person with whom the council is conducting, or proposing to conduct, business, or to prejudice the commercial position of the council; and (ii) would, on balance, be contrary to the public interest

(d) commercial information of a confidential nature (not being a trade secret) the disclosure of which (i) could reasonably be expected to prejudice the commercial position of the person who supplied the information, or to confer a commercial advantage on a third party; and (ii) would, on balance, be contrary to the public interest

RECOMMENDATION

Pursuant to Section 90(2) and (3)(b) and (d) of the Local Government Act 1999, the Council orders that the public be excluded from attendance at that part of this meeting relating to Agenda Item GC250128F.11.1 - Seacliff Golf Management Agreement, except the following persons: Chief Executive Officer, Manager Office of the CEO, General Manager City Development, General Manager City Services, General Manager Corporate Services, Chief Financial Officer, Manager City Property, Unit Manager Property Strategy and Delivery, Unit Manager Property and Facilities, Team Leader Property and Facilities, Sport and Community Facilities Planner, Unit Manager Governance and Council Support, Governance Officer and Media and Engagement Adviser, to enable the Council to consider the Item in confidence on the basis the Council considers it necessary and appropriate to act in a meeting closed to the public (excepting those persons listed above) in order to receive, discuss or consider in confidence the following information or matter relating to the Item:- information the disclosure of which could reasonably be expected to prejudice the commercial position of the person who supplied the information.

Notes the disclosure of this information would, on balance, be contrary to the public interest because it could infer a financial advantage to another entity.

Determines, on this basis, the principle that meetings of the Council should be conducted in a place open to the public has been outweighed by the need to keep consideration of the information or matter confidential.

11.2 Cover Report - Southern Soccer Facility Pitch 4 Additional funding

Report Reference	GC250128F11.2
Originating Officer	Business Support Officer - Governance and Council Support – Cassidy Mitchell
Corporate Manager	Manager City Property - Mark Hubbard
General Manager	General Manager City Development - Ben Keen

REASON FOR CONFIDENTIALITY

Local Government Act (SA) 1999 S 90 (2) 3

(b) information the disclosure of which (i) could reasonably be expected to confer a commercial advantage on a person with whom the council is conducting, or proposing to conduct, business, or to prejudice the commercial position of the council; and (ii) would, on balance, be contrary to the public interest

RECOMMENDATION

Pursuant to Section 90(2) and (3)(b) of the Local Government Act 1999, the Council orders that the public be excluded from attendance at that part of this meeting relating to Agenda Item GC250128F11.2 - Southern Soccer Facility Pitch 4 Additional funding, except the following persons: Chief Executive Officer, Manager Office of the CEO, General Manager City Development, General Manager City Services, General Manager Corporate Services, Chief Financial Officer, Manager City Property, Unit Manager Property Strategy and Delivery, Sport and Community Facilities Planner, Unit Manager Governance and Council Support, Governance Officer and Media and Engagement Adviser, to enable the Council to consider the Item in confidence on the basis the Council considers it necessary and appropriate to act in a meeting closed to the public (excepting those persons listed above) in order to receive, discuss or consider in confidence the following information or matter relating to the Item:- information the disclosure of which could reasonably be expected to prejudice the commercial position of the persons who supplied the information.

Notes the disclosure of this information would, on balance, be contrary to the public interest because it may confer a commercial advantage on persons with whom the Council is proposing to conduct business with as it contains projected costs for project.

Determines, on this basis, the principle that meetings of the Council should be conducted in a place open to the public has been outweighed by the need to keep consideration of the information or matter confidential.

12.1 Final draft submission - Waste to resources EPP Policy

Report Reference	GC250128R12.1
Originating Officer	Environment Officer (Waste and Recycling) – Allison Byrne
Corporate Manager	Manager Engineering, Assets and Environment - Mathew Allen
General Manager	General Manager City Services - Angela Allison

REPORT OBJECTIVE

The purpose of this report is to seek endorsement of the City of Marion's final draft response to the State Government's review of the *Environment Protection (Waste to Resources) Policy 2010*.

REPORT HISTORY

Report Reference	Report Title
IEC240806R6.3	Reducing Food Waste to Landfill
IEC241112R7.4	Draft Submission – EPP Review
SGC241015R11.1	Reducing Food Waste to Landfill
GC241210R11.2	Final draft submission - Waste to resources EPP Policy

EXECUTIVE SUMMARY

Note: This report and submission were previously considered by General Council at the 10 December 2024 meeting (GC241210R11.2). The EPA has granted an extension for the City of Marion to make this submission following re-consideration by General Council before 29 January 2025.

Switching to a weekly green organics (FOGO) collection and a fortnightly landfill collection is the most effective way to reduce the volume and therefore environmental harm of organic waste in landfill. Organic material in red bins generates significant greenhouse gases and wastes valuable compostable resources. Extensive analysis on this topic by Council (IEC240806R6.3 and SGC241015R11.1) confirms fortnightly landfill collection is feasible for most residents, with optional weekly services still available for those with genuine need.

However, the legislative requirement for weekly landfill collection prevents this shift. Council has resolved to advocate for reform:

- **Resolution SGC241015R11.1** "That Council advocates for changes in State Government legislation that improve environmental outcomes through the diversion of food waste from landfill, including advocating to remove the requirement for a weekly kerbside landfill (red bin) collection."

The South Australian Environment Protection Authority (SA EPA) invites local governments and other government, industry and community stakeholders to make submissions in response to its discussion

paper, *Beyond Recycling: Moving SA Towards a Circular Economy* for its review of the *Environment Protection (Waste to Resources) Policy 2010*, South Australia's key piece of waste-related legislation.

City of Marion's submission highlights strategic priorities, including enhanced regulation, state-wide educational initiatives, and targeted incentives to promote a circular economy.

Key recommendations focus on the following areas:

- **Education to support behaviour change:** We recognise that legislation change must be paired with appropriate education and behaviour change programs. Resourcing and support from State Government is critical in this approach.
- **Flexible kerbside bin collection: Council would like to see the removal of the requirement for a weekly landfill (red bin) collection.** This mandate is a major limitation on financial viability of a weekly green organics collection and therefore a major limitation on diversion of food waste from landfill to green organics recycling. Further consideration and community consultation by the EPA could be achieved through a Regulatory Impact Statement and Regulatory Impact Assessment.
- **Product Stewardship:** Addressing concerns over planned obsolescence by encouraging manufacturers to design products with longer lifespans to reduce waste and regulate their contribution to managing end of life and recycling costs associated with their products.
- **Business Waste Management:** Council advocates for educational support over regulation for businesses in managing waste, with a greater focus on reducing waste and reusables to address space constraints.
- **Public Place Recycling:** High contamination rates and associated costs are a concern. Regulation in this space is therefore not recommended.
- **Safe and accessible disposal options for prohibited waste items:** As a matter of urgency and community safety, the ban of e-waste in the current W2R EPP requires sufficient resourcing by the EPA to ensure safe and accessible disposal options for e-waste materials, particularly li-ion batteries. Additional support from the State Government is needed to ensure that disposal options beyond kerbside collections are easy for the community to access and use for banned items.
- **Impact Analysis:** Further information needs to be provided on the anticipated roles and responsibilities of the EPA, GISA and local governments, consideration of how additional regulatory requirements would be resourced and financial impacts on councils.

The submission highlights the need for increased investment from the State Government to support these initiatives and drive progress towards a sustainable, circular economy.

RECOMMENDATION

That Council:

1. **Endorses the final draft submission to the EPA Discussion Paper on the review of the *Environment Protection (Waste to Resources) Policy 2010* (Attachment 2), subject to any amendments made in the meeting.**

DISCUSSION

With an increasing need to move away from a linear economy and towards a circular economy to design out waste and pollution, reduce reliance on virgin materials, increase resource recovery and reduce greenhouse gas emissions, all levels of government have important roles to play in this shift.

In November 2024, the Infrastructure and Environment Committee (IEC) considered the primary directions of the SA EPA's discussion paper *Beyond recycling: moving SA towards a circular economy*¹ and discussed the key priorities of emphasis for the development of City of Marion's final draft submission (Attachments 1 and 2).

The EPA's discussion paper is presented as a broad engagement document to provide feedback and ideas to inform amendments to the W2R EPP from a diverse range of stakeholders. The discussion paper along with a range of supporting material has been shared for public review on the yourSAy website www.yoursay.sa.gov.au/beyond-recycling. The public consultation period is from 23 September 2024 until 20 December 2024 (Note: the City of Marion has been granted an extension until 29 January 2025).

City of Marion's submission addresses key priorities for waste reduction, circular economy and resource recovery, as well as where we would like to see additional focus in the application of regulation.

The submission lists recommended strategies and actions, particularly supporting the use of improved regulation, coordinated metropolitan and state-wide education campaigns and incentives targeted at improving resource recovery and circular economy. We look forward to seeing further investment from the State Government in this space.

Key recommendations outlined in the final draft submission response to the W2R EPP include:

- **Education to support behaviour change:** We recognise that legislation change must be paired with appropriate education and behaviour change programs.
- **Flexible kerbside bin collection: Council would like to see a removal of the requirement for a weekly landfill (red bin) collection.** This mandate is a major limitation on financial viability of a weekly green organics collection and therefore a major limitation on diversion of food waste from landfill to green organics recycling. We appreciate that there are some concerns in the community around this proposal, however we believe that we can still service alternative landfill collection options for residents that demonstrate a genuine need. Further consideration and community consultation by the EPA could be achieved through a Regulatory Impact Statement and Regulatory Impact Assessment.
- **Product Stewardship:** Addressing concerns over planned obsolescence by encouraging manufacturers to design products with longer lifespans to reduce waste and regulate their contribution to managing end of life and recycling costs associated with their products. Examples include potential mandates on filters for microfibers in washing machines, restrictions on plastic microbeads in products and liquid paperboard recycling.
- **Business Waste Management:** Council advocates for educational support over regulation for businesses in managing waste, and with a greater focus on reducing waste and reusables to address space constraints.
- **Public Place Recycling:** High contamination rates and associated costs are a concern. Regulation in this space is therefore not recommended.

¹ Mussared, Cate (2024). *Beyond recycling: Moving SA towards a circular economy A review of the Environment Protection (Waste to Resources) Policy 2010*. Environment Protection Authority. South Australia. ISBN 978-1-925521-08-5

- **Safe and accessible disposal options for prohibited waste items:** As a matter of urgency and community safety, the ban of e-waste in the current W2R EPP requires sufficient resourcing by the EPA to ensure safe and accessible disposal options for e-waste materials, particularly li-ion batteries.
While the Council supports expanding landfill bans to encourage greater resource recovery from items like mattresses, lithium-ion batteries, and other e-waste, it is crucial to provide the community with accessible and convenient disposal alternatives. The Council's kerbside collection system simplifies waste separation and disposal for residents. However, additional support from the State Government is needed to ensure that disposal options beyond kerbside collections are easy for the community to access and use for banned items.
- **Impact Analysis:** Further information needs to be provided on the anticipated roles and responsibilities of the EPA, GISA and local governments, consideration of how additional regulatory requirements would be resourced and financial impacts on councils.

ATTACHMENTS

1. Attachment 1 Draft Cover Letter _W2R_EPP [12.1.1 - 2 pages]
2. Attachment 2 Draft Submission _W2R_EPP [12.1.2 - 24 pages]



29/01/2025

Environment Protection Authority
GPO Box 2607
Adelaide SA 5001

PO Box 21, Park Holme
South Australia 5043

245 Sturt Road, Sturt
South Australia 5047

T (08) 8375 6600

F (08) 8375 6699

E council@marion.sa.gov.au

To whom it may concern,

Re: City of Marion submission to the W2R EPP discussion paper

Thank you for the opportunity to contribute to the review of the *Environment Protection (Waste to Resources) Policy 2010*.

The City of Marion has a strong history of effective collaboration and partnership with stakeholders to achieve waste minimisation and resource recovery, and we are committed to supporting the increasing move towards a circular economy in collaboration with State Government.

Waste minimisation continues to be a high priority for the City of Marion, with a particular focus on:

- **Education to support behaviour change:** We recognise that legislation change must be paired with appropriate education and behaviour change programs. Resourcing and support from State Government is critical in this approach.
- **Flexible kerbside bin collection: Council would like to see a removal of the requirement for a weekly landfill (red bin) collection.** This mandate is a major limitation on financial viability of a weekly green organics collection and therefore a major limitation on diversion of food waste from landfill to green organics recycling. We appreciate that there are some concerns in the community around this proposal, however we believe that we can still service alternative landfill collection options for residents that demonstrate a genuine need. Further consideration and community consultation by the EPA could be achieved through a Regulatory Impact Statement and Regulatory Impact Assessment.
- **Product Stewardship:** Addressing concerns over planned obsolescence by encouraging manufacturers to design products with longer lifespans to reduce waste. Examples include potential mandates on filters for microfibers in washing machines, restrictions on plastic microbeads in products and liquid paperboard recycling.

The City of Marion acknowledges we are situated on the traditional lands of the Kaurna people and recognises the Kaurna people as the traditional custodians of the land.



marion.sa.gov.au

- **Business Waste Management:** Council advocates for educational support over regulation for businesses in managing waste, and with a greater focus on reducing waste and reusables to address space constraints.
- **Public Place Recycling:** High contamination rates and associated costs are a concern. Regulation in this space is therefore not recommended.
- **Safe and accessible disposal options for prohibited waste items:** As a matter of urgency and community safety, the ban of e-waste in the current W2R EPP requires sufficient resourcing by the EPA to ensure safe and accessible disposal options for e-waste materials, particularly li-ion batteries.
While the Council supports expanding landfill bans to encourage greater resource recovery from items like mattresses, lithium-ion batteries, and other e-waste, it is crucial to provide the community with accessible and convenient disposal alternatives. The council's kerbside collection system simplifies waste separation and disposal for residents. However, additional support from the State Government is needed to ensure that disposal options beyond kerbside collections are easy for the community to access and use for banned items.
- **Impact Analysis:** Further information needs to be provided on the anticipated roles and responsibilities of the EPA, GISA and local governments, consideration of how additional regulatory requirements would be resourced and financial impacts on councils.

Please find enclosed our full submission which was endorsed at the General Council Meeting held on 28 January 2025. We thank the EPA contact officers for granting an extension to enable this submission to be formally considered by General Council outside of the public consultation period.

Council looks forward to collaborating with the EPA and other partners on the outcomes of this legislation review and hopes to see meaningful circular economy outcomes in our city as a result.

Yours faithfully,

Kris Hanna
Mayor, City of Marion

The City of Marion acknowledges we are situated on the traditional lands of the Kaurna people and recognises the Kaurna people as the traditional custodians of the land.



marion.sa.gov.au

W2R EPP Review

Submission on EPA SA discussion paper
'Beyond recycling: Moving SA towards a Circular economy'

DECEMBER 2024



This submission on the discussion paper, *Beyond Recycling: Moving SA Towards a Circular Economy*, which reviews the *Environment Protection (Waste to Resources) Policy 2010* (W2R EPP) has been prepared by the City of Marion for consideration by the Environment Protection Authority.

The response has been prepared based on materials available at:
<https://yoursay.sa.gov.au/beyond-recycling>

This final version was endorsed by the City of Marion at the General Council held on 28 January 2025 following agreement by the EPA contact officers for the submission to made after the 20 December 2024 public consultation deadline.

DOCUMENT PROPERTIES

Contact for further information.

Contact Officer: Allison Byrne
Title: Environment Officer (Waste and Recycling)
Email: allison.byrne@marion.sa.gov.au

W2R EPP Review

Submission on EPA SA discussion paper
'Beyond recycling: Moving SA towards a Circular economy'

DECEMBER 2024



Table of Contents

Executive Summary	2
Waste management in the City of Marion	4
About this submission	7
Response to W2R EPP discussion paper	8
Key area 1: Supporting the transition to a more circular economy	8
Key area 2: Avoiding Waste Generation	8
Key area 3: Maximising resource recovery	10
Key area 4: Supporting a strong market for recovered resources	18
Key area 5: Protecting the environment and human health from waste pollution	20
Key area 6: Circular economy metrics, reporting and transparency	20
Additional questions	23

Executive Summary

The Environment Protection Authority's (EPA) discussion paper, *Beyond Recycling: Moving SA Towards a Circular Economy*, which reviews the *Environment Protection (Waste to Resources) Policy 2010*, is an extensive document that provides thought-provoking questions and seeks feedback on a large range of potential regulatory measures to improve circular economy in South Australia.

This submission addresses the key priorities for the City of Marion for waste reduction, circular economy and resource recovery, as well as where we would like to see additional focus in the application of regulation.

This submission includes a summary of resource recovery and waste management efforts at the City of Marion and the priorities that we see coming through from our community. The submission directly addresses the six key areas of the discussion paper.

Council is already working hard to achieve many of the ambitions of *South Australia's Waste Strategy 2020 – 2025*, but without additional resourcing we will not be able to make the substantial "step-up" that achieving these actions will require. Our ability to apply increases in council rates to meet this challenge is very limited and we are going to be reliant on support from State Government and other sectors to find additional resourcing.

To address the issue of low food waste diversion, Council would like to see a removal of the requirement for a weekly landfill (red bin) collection. This mandate is a major limitation on financial viability of a weekly green organics collection and therefore a major limitation on diversion of food waste from landfill to green organics recycling. We appreciate that there are some concerns in the community around this proposal, however we believe that we can still service alternative landfill collection options for residents that demonstrate a genuine need. Further consideration and community consultation by the EPA could be achieved

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



through a Regulatory Impact Statement and Regulatory Impact Assessment.

We believe that the manufacturing sector continues to profit from the absence of responsibility for the end fates of hard-to-recycle materials that are placed in the market, with council and others needing to find resources to manage these materials in a safe and sustainable way. This could be directly addressed by the State Government with new levers to incentivise producers and manufacturers to design out waste and pollution and new funding streams that better account for the ever-increasing waste management costs of a linear material economy and planned obsolescence of many products.

The EPA's discussion paper is presented as a broad encouragement to provide feedback and ideas to inform amendments to the W2R EPP from a diverse range of stakeholders. Whilst this collective vision is needed, we believe that the W2R EPP should make the role of the EPA in enforcing, reporting and evaluating the effectiveness of this legislation clearer.

We particularly support the use of improved regulation, coordinated metropolitan and state-wide education campaigns and incentives targeted at improving resource recovery and circular economy. We look forward to seeing further investment from the State Government in this space.

Congratulations to the EPA and the State Government on this important legislation review. We look forward to working further with the EPA and GISA on implementation.

The following recommendations are made in this submission:

1. Mechanisms need to be put in place to prevent the cost-shifting of end-of-life management of materials to the public sector and households via rates. Producers of waste must take some responsibility of the cost for managing the waste from products they manufacture and import via a compulsory (not voluntary) [extended producer responsibility \(EPR\) scheme](#).
2. Leadership from the Federal Government is missing from Key Area 2. State Government should work with the Federal Government to address the growing waste problems which require effective product stewardship frameworks.
3. The City of Marion would like to see a product stewardship requirement developed for liquid paperboard containers to allow recycling of this packaging.
4. Provide exemptions in a requirement to provide a standardised three-bin system to allow local government discretion on decisions to remove recycling and/or organics bins in cases of ongoing misuse, gross contamination and public nuisance.
5.
 - a) The City of Marion urges the EPA to revoke Part 3 Clause 10(2) of the current policy being "In order to facilitate the proper management of waste that is to be collected under subclause (1)(b), a metropolitan council must provide a weekly general kerbside waste collection service (other than for recyclable waste or vegetative matter) in respect of residential premises within its area".
 - b) A Regulatory Impact Assessment should be undertaken by the EPA and a Regulatory Impact Statement developed as part of this legislation review with a focus on determining the most effective approach to diverting food waste from municipal

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



- solid waste to meet State and National waste strategy targets with due consideration to cost, community concerns and broad environmental and economic impacts.
6. The City of Marion considers regulation of bin lid colours a low priority action due to its potentially high cost and low impact on increasing resource recovery. We urge the EPA to defer this idea to Green Industries SA for their potential consideration as an incentive program.
 7. To achieve resource recovery in the C & I sector, small and medium-sized businesses need substantial education and capacity-building support from the State Government before regulation is effective. Mandating recycling should not take precedence over circular economy strategies for reducing waste and reusing resources.
 8. Provide exemptions in a requirement for prohibiting recombining separately collected materials to continue allowing local government discretion on decisions to dispose of recycling or organics kerbside bins as general waste in cases of ongoing misuse of recycling services.
 9. The State Government should gather data on the tonnes of waste disposed in the public realm to inform future strategies in this area. Funds raised from the solid waste levy could be used for the purpose of establishing a tracking and measurement system for public place waste management.
 10. Mandatory targets for use of recycled content in products purchased should be established in a state-level procurement and/or regulatory framework to drive demand for products containing recycled content and to support strong markets.
 11. As a matter of urgency and community safety, the ban of e-waste in the current W2R EPP requires sufficient resourcing by the EPA to ensure safe and accessible disposal options for e-waste materials, particularly li-ion batteries.
 12. In favour of capacity-building and support to councils over regulation, the City of Marion requests that GISA update the guidelines for best practice kerbside waste audits which is overdue for renewal to achieve the desired outcome in kerbside audit data consistency.
 13. Further information needs to be provided on the anticipated roles and responsibilities of the EPA, GISA and local governments, consideration of how additional regulatory requirements would be resourced and financial impacts on councils which ultimately places further pressure on rates.

Waste management in the City of Marion

The City of Marion is in Adelaide's south-western suburbs, around 10 kilometres from the Adelaide CBD, and contains a variety of household types and sizes.

As one of the largest metropolitan councils in South Australia, we provide a range of community and environmental services to a resident population of around 100,000 people living in 43,000 households. More about our organisation, community, and the services that

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



we offer can be viewed on our website¹.

Kerbside three-bin system

In accordance with our Waste Management Policy² and collection service contract with Cleanaway, all CoM ratepayers are entitled to a three-bin kerbside collection service composed of:

- one 140L general waste (landfill) collected weekly,
- one 240L co-mingled recycling collected fortnightly and
- one 240L FOGO bin, collected on alternate fortnights.

Our current kerbside bin collection contract with Cleanaway expires in April 2027, with an option to extend for a further three-year period at Council's discretion.

Any household or business can arrange one or more additional bins for any of these three waste streams as a direct fee-for-service arrangement with Cleanaway, to whom they pay directly. As at May 2024, there were:

- 21 households with a second waste bin (at fees of \$240 per year per household)
- 26 households with a second recycling bin (at fees of \$120 per year per household)
- 191 households with a second FOGO bin (at fees of \$120 per year per household)

The City of Marion (CoM) has a 54% waste diversion rate, above the state average of 51%. Whilst use of the yellow recycling bin is high, only 15% of food waste goes into the green organics bin.

The approximate annual cost of delivering the three-bin kerbside collection service was \$8.3 million in 2023/24 FY.

Once collected, each waste stream is delivered to one of council's contractors to undergo processing and disposal:

- Material collected from the general waste bins is sent to the landfill at SRWRA.
- Co-mingled recycling is collected and taken to the Southern Materials Recovery Facility at SRWRA to be sorted, baled, and sent for reprocessing into new products.
- FOGO material is sent to Peats Soils and turned into certified organic compost for agriculture, horticulture, and home gardens.

Public litter bins

The City of Marion provides approximately 500 public litter bins and dog poo bag dispensers throughout the city in appropriate public areas. The public litter bins are emptied as part of the general waste kerbside bin collection schedule.

¹ www.marion.sa.gov.au

² <https://www.marion.sa.gov.au/assets/sp/Waste-Management-Policy.pdf>

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



Hard waste service and illegal dumping response

The City of Marion also delivers a hard waste service which includes collections of mattresses and e-waste (non-product stewardship items). This service is taken up by approximately 20,000 households per year. At-call bookings have an average wait time of 2 – 4 weeks, however a resident requiring urgent assistance (such as moving out of a rental property) can usually be accommodated the following week).

Illegal dumping of bulky and building waste is an ongoing issue and council delivers a response program involving:

Enforcement:

1. Signage to deter dumping in known suburban illegal dumping hotspots.
2. Use of CCTV cameras at illegal dumping hotspots on public land (e.g. in parks and along railway corridors).

Education:

3. Taping up illegally dumped waste with yellow and black 'illegally dumped under investigation tape'.
2. Letterboxing surrounding houses encouraging the offender to recover the illegally dumped materials. Recovery by offender occurs in some instances.

Collection:

4. In most cases when the material is not recovered by the offender, the council's hard waste collection team will remove the materials to avoid further dumping.

The illegal dumping response program handled 1784 instances of illegal dumping in 2023/24.

Strategic vision for Sustainability

Our community consistently ranks recycling, environmental sustainability and reducing waste amongst their most important aspirations for the future. This has been evidenced in a variety of recent consultation activities including our [Towards 2040...Together](#) community engagement program associated with the comprehensive review of our 10-year strategic plan. The top overall concern for our community was recycling and reducing waste.

Given the importance of waste minimisation to our community, the high expectations they have of council to address waste-related issues and the limited control we have over waste prevention and reduction measures, we are striving to ensure that we deliver best practice waste management services.

Industry-leading waste and circular economy initiatives delivered by the City of Marion³ include:

- [Southern Materials Recovery Facility \(SMRF\)](#): Officially opened in October 2021 as a joint initiative of Australian recycling and resource recovery specialist, Re.Group, and the Southern Region Waste Resource Authority (SRWRA), a joint subsidiary of three South Australian councils – the City of Marion, the City of Onkaparinga and City of Holdfast Bay. The SMRF is not only South Australia's largest household recycling facility, but also home to world-leading advanced

³ Refer to www.marion.sa.gov.au for further information on these programs

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



screening and optical and robotic sorting technologies funded by Federal and State Government grants.

1. **Food waste recycling program:** Following a long-running opt-in kitchen caddy program from 2013-2020, a city-wide delivery of kitchen caddies and compostable liners was delivered in 2021, accompanied by an award-winning communications campaign.⁴ This initiative has shifted an additional 15% of food waste (from 5% to 20%) to the green bin since the program was rolled out and helps to maintain the current level of food waste diversion. This percentage increase equates to greenhouse gas emission reduction of 2,174 tonnes Co₂-e.
- **Circular economy project:** An innovative circular economy project with five local businesses receiving advice and support from our Economic Development team and a circular economy consultant to understand how circular economy can be incorporated into their business, identify opportunities and develop action plans.
- **Tip tickets for hard waste:** City of Marion was the first council in metropolitan Adelaide to introduce tip tickets in 2012 which allows residents to dispose of a trailer-load of materials to a selected transfer station for free in lieu of a kerbside collection booking. Collection wait times for a booked kerbside pickup is generally 2 to 4 weeks, therefore this provides an immediate solution to mitigate risks of illegal dumping and allows a resident to dispose of materials which can't be accepted at kerbside such as bulk green waste, bulk cardboard or home renovation materials.
- **Doggie dunnies for organic waste:**⁵ Specially designed steel bin enclosures for accepting only dog waste bags have been installed in our two dog parks and contain green organics MGBs to divert compostable dog waste from landfill. The 'maze' bin lid design prevents contamination from other waste such as broken dog toys and drink containers.
- **Waste and recycling education:** Ongoing education and behaviour-change programs and projects including community education presentations, events and communications that promote waste minimisation. The recent 'Valuing Marion's Waste' project installing three-bin indoor systems in all council-managed facilities using over 300kg of recycled plastic in the infrastructure received an honourable mention at the ALGA awards earlier this year.⁶

The City of Marion is also part of two key regional partnerships to deliver waste management services:

1. The Southern Region Waste Resource Authority (SRWRA) supports the Cities of Marion, Holdfast Bay and Onkaparinga to manage our waste and recycling facilities, renewable energy hub and landfill.
2. Joint waste management contract between Cities of Marion, Charles Sturt, Adelaide and Port Adelaide-Enfield with Cleanaway for general waste, co-mingled recycling and organics kerbside bin collections.

⁴ <https://www.marion.sa.gov.au/about-council/news/city-of-marion-wins-lga-marketing-campaign-of-the-year-award>

⁵ <https://www.marion.sa.gov.au/about-council/news/doggie-dunnies-trial>

⁶ <https://www.infrastructure.gov.au/territories-regions-cities/local-government/national-awards-local-government/2024/waste-management-honourable-mention>

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



About this submission

This submission has been prepared based on the experience and advice of specialist staff at the City of Marion and more broadly through the LGA SA. We consider that the priorities in this submission reflect leading, best practice waste minimisation for local government.

We would also like to note that many of the priorities raised in this submission have been raised through other pathways to support the broader changes that we believe are required to improve the container deposit scheme, product stewardship and extended producer responsibility (EPR), management of problematic waste materials, reduction of food waste and advancement of circular economy. This includes Council endorsed submissions to:

- *A Vision for a Circular Economy: Waste Strategy 2020-2025 Consultation Draft* (August 2020).
- SA's draft strategy to reduce and divert food waste, *Valuing Our Food Waste: South Australia's strategy to reduce and divert household and business food waste* (August 2020).
- The EPA's discussion paper on the **Container Deposit Scheme**, *Improving South Australia's Recycling Makes Cents* (November 2021).
- Green Industries SA discussion papers on **single-use plastic bans** (February 2019 and February 2022).
- Legislative Council of South Australia's **Select Committee inquiry into the recycling of soft plastics** and other materials (August 2023).

This submission to the W2R EPP review has been prepared with input from a range of different professional areas with the City of Marion including:

- Environmental sustainability
- Waste management
- Economic development
- Procurement.

Feedback for this final submission also incorporates comments from City of Marion Council Members gathered at its Infrastructure and Environment Committee held on 12 November 2024 with the final submission endorsed by the City of Marion at the General Council held on 28 January 2025 following agreement by the EPA contact officers for the submission to made after the 20 December 2024 public consultation deadline.

Response to W2R EPP discussion paper

Key area 1: Supporting the transition to a more circular economy

The City of Marion agrees that circular economy and climate change mitigation should be objectives of the W2R EPP objectives and regulatory framework. This will be essential to designing out waste and pollution, reducing reliance on virgin materials and reducing

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



greenhouse gas emissions, driving extended product lifecycles and maximising resource recovery.

The proposed policy objective for the W2R EPP has alignment with Council's Strategic Plan 2024-2034, notably through the following community vision and associated strategies and actions:

- **Sustainable** - We protect, restore and connect to the natural environment, building resilience to climate change.

Priority S1: Protect, restore and manage

S1.1 - Minimise waste, maximise resource recovery and build a circular economy, through our services and support to organisations and the community.

Priority S3: Building resilience to climate change.

S3.1 - Build resilience to climate change by managing the impacts and risks.

The City of Marion supports the proposed new waste hierarchy as a useful tool in providing direction with regards to decision-making and assessing waste prevention and management activities.

Practical considerations would need to consider the broader context of local processing availability, time frames, market pressures and cost when assessing a recycling proposal that in principle should have a higher value option for that material.

While concepts such as highest value reuse need to have applicable definition, they need to be general or flexible enough to accommodate innovation and technology developments over time.

It would also be beneficial to clarify the role of commercial composting in the hierarchy.

Key area 2: Avoiding Waste Generation

The City of Marion supports development of a state-based product stewardship legislative framework including standards for the design, manufacturing and selling of products to reduce waste generation, improve durability and recyclability of products, and enable better conservation of materials and resources in a circular economy.

The growing volume of non-recyclable and poorly designed packaging in the market that ends up in the municipal solid waste stream has placed a significant financial burden on councils.

Extended producer responsibility (EPR) is of critical importance to local governments as it addresses key challenges in managing kerbside waste collection. Under current systems, local government shoulder the significant financial and operational burden of collecting, sorting, and processing of packaging waste from households. These costs are passed on to households and businesses through council rates. Implementing a holistic EPR scheme will reduce this cost pressure by reducing waste and improving sorting processes for recyclable materials.

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



We also face difficulties in community education with mixed material packaging, misleading labelling and hard-to-recycle products flooding the market. An EPR provides a fairer approach by transferring this responsibility to the producers, ensuring those who place packaging on the market are accountable for its entire lifecycle, from design to disposal, and for adequate labelling to ensure resource recovery.

With plastics forming the second largest waste stream in the world going to municipal solid waste (following food waste as the biggest waste stream), taxes ought to form part of a long-term solution to the problem of plastic waste to encourage manufacturers to reduce the volumes of plastic waste they produce and to ensure for the plastics they produce that there is a circular economy for the material.

- Other countries such as the United Kingdom have introduced a [plastic packaging tax](#), imposed on domestically manufactured or imported packaging which contains less than 30% recycled plastic.
- Plastic packaging taxes have also been introduced in Spain and Italy, based on a fee per kilogram of non-recycled plastic used in products.

Recommendation 1: Mechanisms need to be put in place to prevent the cost-shifting of end-of-life management of materials to the public sector and households via taxes and rates. Producers of waste must take some responsibility of the cost for managing the waste from products they manufacture and import via a compulsory (not voluntary) [extended producer responsibility \(EPR\) scheme](#).

The Australian Government must also be held to account for its National Packaging Target of 70% of plastic packaging being recyclable or compostable by 2025.

Opportunities for State and/or Federal government regulatory intervention include:

- Regulating businesses to reduce product packaging material.
- Encouraging circular-use products and discouraging linear-use products.
- Introducing criteria for products to be addressed by legislation or regulation, including:
 - Poor quality plastic products commonly disposed to landfill after single use,
 - Products unable or unlikely to be recycled.

Government leadership is an important consideration for the W2R EPP. The City of Marion will continue to demonstrate leadership in waste minimisation and partner with State Government on related projects where possible. While we are very supportive of the objectives of the W2R EPP, more work is needed to ensure buy-in from relevant State Government agencies.

State Government leadership is critical and is required across all State Government agencies. Some of the more significant challenges for local governments in delivering circular economy outcomes and sustainable waste management result from State Government legislation and practices. The City of Marion has seen this challenge associated with incorporating wine bottles into the Container Deposit Scheme, hard-to-recycle products

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



flooding the market and planned obsolescence in clothing, household furniture and appliances.

Recommendation 2: Leadership from the Federal Government is missing from Key Area 2. State Government should work with the Federal Government to address the growing waste problems which require effective product stewardship frameworks.

Mandating **washing machine filters** being fitted into washing machines for sale is supported, as clothing microfibres are the world's biggest source of microplastic pollution in the waterways and seas. These plastic microfibres have been detected in City of Marion wetlands. Options to reduce and remove these contaminants are important to protect environmental quality and maintain services such as water recycling and manager aquifer recovery (MAR) schemes.

The City of Marion also supports phasing out **plastic microbeads** in South Australian regulation to strengthen the federal voluntary phase-out scheme which started in 2016, and the state-based bans in personal care rinse-off products which have been introduced in NSW, QLD and WA.

Liquid paperboard beverage containers would benefit from a product stewardship requirement. In our region, the SMRF continues to accept Tetrapak cartons. While they are not currently recycled, Re.Group, our SMRF operator, has expressed interest in finding future recycling pathways, so we have kept that opportunity open in our community education messaging.

Recommendation 3: The City of Marion would like to see a product stewardship requirement developed for liquid paperboard containers to allow recycling of this packaging.

Key area 3: Maximising resource recovery

Municipal solid waste

In principle, a requirement to provide a standardised three-bin system to residential premises is supported. All ratepaying properties in the City of Marion are entitled to receive a standard three-bin system.

Flexibility is essential with this type of legal requirement to allow for case-by-case exemptions. Where the 3-bin service is not being appropriately used by residents, the City of Marion has used its discretion on a case-by-case basis to remove recycling and/or organics bins. This has mostly occurred with organics bins in public housing multi-unit dwellings (MUDs) when there are related issues such as illegal dumping, bins being left out on footpaths and vandalised, and gross contamination of organics bins.

Recommendation 4: Provide exemptions in a requirement to provide a standardised three-bin system to allow local government discretion on decisions to remove recycling and/or organics bins in cases of ongoing misuse, gross contamination and public nuisance.

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



Learnings from local government trials of weekly FOGO collections

This year the City of Marion completed its investigation into the feasibility of delivering a city-wide rollout of weekly FOGO and fortnightly landfill kerbside bin collections, which included:

- detailed analysis of the various trial methods and results of metropolitan Adelaide councils,
- pricing from our kerbside bin collection contractor,
- cost modelling for servicing the City of Marion's 43,000 ratepayers based on anticipated opt-out rates,
- environmental and economic cost-benefit analysis.

Key findings of our business case were that:

1. Weekly FOGO bin collections in Cities of Holdfast Bay, Charles Sturt and Prospect achieved an average waste diversion increase from 57% to 69%, offering promise as the kind of system change required to lift the MSW diversion rate closer to the State target of 70%.
2. While some metropolitan Adelaide councils have been able to contain opt-out rates to 5% or less in a small-scale trial, when their approach is scaled up to a citywide population, the minimum opt-out rate from our modelling is expected to be 15 - 20%, which represents an additional annual service cost for the City of Marion of around \$900,000.
3. Opting out of fortnightly landfill is likely to reach up to 40% over time which would result in two separate waste management services being delivered in one council area. Opt-outs of fortnightly landfill are difficult to administer and to track individual households opting in and out on an ongoing basis; this is also confusing for householders where varied bin collection arrangements occur in the same street.
4. Studies from other councils indicate that many people opting out of a weekly FOGO service want to retain a weekly landfill collection simply because they have no incentive to change their behaviour. Very few have a demonstrated genuine need for weekly waste collection.
5. Opt-outs from weekly FOGO/ fortnightly landfill collection are economically and environmentally unsustainable. The only metropolitan council to have rolled out the sustainable kerbside service city-wide has an opt-out rate of 27% (as of August 2024) and has concerns about financial viability into the future.
6. Despite delivering a city-wide roll-out of kitchen caddies and compostable bags to all City of Marion households in 2021, this has only achieved a material separation efficiency of 15% food waste, with 85% of food waste (approximately 6,000 tonnes) still going in the general waste bin.
7. Our experience over eleven years of delivering the kitchen caddy program (opt-in from 2013 and city-wide delivery from 2021) and community surveys to understand the barriers to greater food waste diversion, indicate that the green bin collection frequency is the main reason why more people don't put food waste in the green bin.

At its Special General Council Meeting on 15 October 2024, Council considered a business case and passed the following resolutions regarding the feasibility to deliver a weekly FOGO service:

That Council:

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



1. Notes that due to the uncertain legislative environment and unpredictable financial impacts to council, it is not currently feasible to deliver a weekly organics waste collection service.
2. Defers consideration of a weekly FOGO service until after the review of the Environment Protection (Waste to Resources) Policy 2010 (EPP) under the Environment Protection Act 1993.⁷

Recommendation 5A: The City of Marion urges the EPA to revoke Part 3 Clause 10(2) of the current policy being “In order to facilitate the proper management of waste that is to be collected under subclause (1)(b), a metropolitan council must provide a weekly general kerbside waste collection service (other than for recyclable waste or vegetative matter) in respect of residential premises within its area”.
This policy statement hinders the ability to achieve the existing or the proposed objectives of the W2R EPP, nor achieve the National Waste Action plan target to recover 80% of all waste by 2030.

Given the success of weekly FOGO on waste diversion rates in South Australia and several jurisdictions interstate and considering the State and National waste strategy targets to be met, further exploration of potential measures to increase food waste diversion rates via the residential kerbside collection system is required. A range of potential measures could be explored via a Regulatory Impact Statement to provide a comprehensive impact analysis and sound evidence base for developing effective regulation in support of resource recovery and circular economy objectives.

Recommendation 5B: A Regulatory Impact Assessment should be undertaken by the EPA and a Regulatory Impact Statement developed as part of this legislation review with a focus on determining the most effective approach to diverting food waste from municipal solid waste to meet State and National waste strategy targets with due consideration to cost, community concerns and broad environmental and economic impacts.

Regulating bin lid colours to reflect Australian standards

For the City of Marion this would entail swapping over the blue public litter bin lids to red (approximately 500) and swapping around 43,000 dark green organics bin lids with lime green ones. The State Government would either need to fund such an undertaking or allow adequate time for bin lids to be replaced as needed over time, as householders would be unlikely to support an increase in rates to cover the cost of changing these bin lid colours.

There is no evidence to suggest that the colour of the general waste bin lid or lime green vs dark green bin lids alter recycling behaviour at the household level or influence a council area's waste diversion rates.

Recommendation 6: The City of Marion considers regulation of bin lid colours a low priority action due to its potentially high cost and low impact on increasing resource recovery. We urge the EPA to defer this idea to Green Industries SA for their potential consideration as an incentive program.

⁷ <https://www.marion.sa.gov.au/assets/meetings/minutes/SGC241015-Public-Minutes.pdf>

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



Commercial and industrial waste

Businesses in the City of Marion have the same entitlements as residents of 1 x 140L waste, 1 x 240L co-mingled recycling and 1 x 240L organics bin.

Mandated resource recovery by businesses would require multiple bins for sorting waste materials and there are numerous practical considerations the EPA must consider, including, but not limited to:

- Lack of physical available space outside the businesses to locate multiple bins for source separation of materials. A local example of this is the Boatshed Café at Hallett Cove foreshore, where they have an interest in recovering organics but nowhere to place an organics bin, as the initial planning and development of the site was tailored for the former surf life-saving club. This is a common issue for small to medium-sized businesses, especially when located along street frontages which back onto residential zones.
- Recent circular economy projects with City of Marion businesses have identified a larger gap in recycling awareness of businesses than householders due to the unique waste management needs that are frequently different to those of households. Businesses are more in need of education and capacity-building prior to considering regulation, which could possibly be introduced later.
- Cost barriers to resource recovery bin collections. Commercial prices of bulk bins do not incentivise the desired behaviour due to lack of economies of scale for collections. For example, these are the following costs per lift from one service provider (unnamed due to commercial in confidence):
 - Waste \$16.07
 - Co-mingled recycling \$15.80
 - Food and garden organics \$26.87

Recommendation 7: To achieve resource recovery in the C & I sector, small and medium-sized businesses need substantial education and capacity-building support from the State Government before regulation is effective. Mandating recycling should not take precedence over circular economy strategies for reducing waste and reusing resources.

City of Marion is supporting a number of small suburban cafes to fund the installation of Fleurieu milk taps to reduce milk bottle waste, which is also a solution to the space issue for recycling bins to capture milk bottle waste. Each milk tap attached to an 18-litre LDPE milk keg avoids the generation of 7,000 2-litre milk bottles every year. Two taps have been installed by CoM to date and more are planned. These types of innovative programs are best supported by a capacity-building partnership approach between councils and GISA rather than by regulation due to the issues raised above.

Mandating cardboard separation by large businesses might be a viable regulatory starting point for the EPA as businesses generating significant volumes are more likely to have the space available and generally it is a cheaper service than general waste disposal.

Alongside space barriers, infrastructure barriers are also an issue. Both businesses and council lack the space to house support services such as polystyrene processing machinery or other resource recovery mechanisms to support resource recovery from local businesses.

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



The EPA ought to proactively consult the business sector about the C & I discussion paper questions to better understand the range of business sizes and types in the South Australian community and the resource implications of the regulation/s being considered.

CoM agrees that it should be mandatory for large businesses generating food waste to provide for resource recovery as a business management cost.

The definition of food waste should be developed in consultation with the business sector.

Most food-generating businesses in the City of Marion are comparatively small and we recognise that they are usually more conscious of their waste impact as the nature of the business is more personal.

In principle, all businesses should be educated and provided with what they need to produce a business waste reduction plan, such as education and self-serve resources. Again, an educational approach rather than a regulatory approach is recommended.

There is also the opportunity to apply the concept of reuse and 'buy nothing' sharing economies with a State Government facilitated reuse centre or facility. The scale would likely need to be larger than a single LGA for it to be viable.

As producers of waste, businesses can achieve waste reduction and superior circular economy measures if provided with guidance and resources.

Prohibiting the recombining of separately collected materials

In principle the City of Marion supports this proposal, and this is already a feature of our operational waste collection procedures.

However, in practice there are occasions on residential kerbside bin collection runs when drivers can identify gross contamination in a recycling or organics bin and in the event of education failing to result in removal of contaminants, arrangements may be made for the contaminated bin/s to be emptied by the residual waste truck to reduce recycling or organics contamination and/or other illegal dumping issues.

Practical consideration needs to be given to this, and council requires discretion to dispose of recycling and organics as general waste in such instances.

Recommendation 8: Provide exemptions in a requirement for prohibiting recombining separately collected materials to continue allowing local government discretion on decisions to dispose of recycling or organics kerbside bins as general waste in cases of ongoing misuse of recycling services.

Mandating public place recycling and organic waste bins

In principle we agree that recycling and organics bins should be provided in public places. However, public place resource recovery is fraught with significant contamination issues that regulation will not fix.

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



Over the past ten years, CoM has trialled recycling bins in the parks surrounding Glandore Community Centre, the Marion Outdoor Pool, dedicated organics bins in 'doggie dunny' units in dog parks⁸ and in the public area upgrades around Oaklands Crossing. They have predominantly received too much contamination for them to be treated as anything other than residual waste (refer images 1 and 2 below).

Best practice has been adhered to in all cases:

- co-location of waste with recycling and/or organics bins
- clear, simple, consistent and colour-coded signage
- tailored bin surrounds such as the doggie dunnies to keep out other waste.



Images 1 and 2: Typical recycling bin at Marion Outdoor Pool with gross contamination from (compostable) greasy, food/drink-soaked cardboard.

Support and resourcing are required to improve community knowledge about recycling in public places before regulation could be considered as a useful tool. These contamination issues are universal and not unique to the City of Marion.

Rather than regulation, the proposed solution is for councils to be able to continue with the current partnership-based capacity-building approach, such as the current support offered by GISA with trials in Cities of Adelaide and Holdfast Bay. It should be noted that these are community education undertakings, with no current resource recovery benefits.

Due to the gross contamination public place recycling bins receive, there needs to be allowance for the material to be treated as landfill waste if the contamination is above acceptable levels for reprocessing.

⁸ <https://www.marion.sa.gov.au/about-council/news/doggie-dunnies-trial>

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



We recognise that public place recycling bins need to be introduced to be able to educate the public and 'shift the needle' but until there is adequate progress with public education and a significant reduction in contamination, resource recovery is not possible to achieve.

Mandating three-bin systems at major events

In principle this is supported, but we urge the EPA to consider the practical implications for managing contamination in the recycling and organics waste bins in the public realm.

City of Marion has provided three-bin systems at all of its major events since 2018. The average scale of major events in CoM is 2,000 – 8,000 people. Waste audits from our council's nine largest events between 2017 - 2024 have indicated that:

- despite good signage, consistent colour-coding and strategic bin placement (refer Image 3), the recycling and organics bins are frequently contaminated. (Refer Images 4-7).
- There is a high level of confusion in the public about correct disposal of takeaway coffee cups and cardboard food containers of uneaten food waste at events.
- Support and resourcing are required to improve community knowledge about recycling at events before regulation could be considered as a useful tool.
- There is very limited understanding in the community about compostable packaging and very limited literacy regarding the labelling and symbols on packaging items for disposal advice.
- The use of volunteer 'bin buddies' at events to guide patrons to dispose of waste in correct bins has increased resource recovery at our events to over 90%. At comparable events without bin buddies, volumes of waste materials placed in recycling and organics bins dropped to 49% and required post-event manual sorting to address gross contamination.
 - These activities are exceptionally resource-intensive for very small volumes. A major event in the City of Marion only generates a total of about 10 x 240L bins full of waste materials across all three streams.



W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



Image 3: Three-bin system and educational signage provided at all medium-large council-run events.



Images 4 and 5: Red waste and green organics event bins both full of compostables. Green bin now free of contamination thanks to the recent single-use plastic legislation, however recovery of compostables remains low.



Images 6 and 7: Event recycling bin and close-up of contents showing gross contamination. This is common behaviour at public events with three-bin systems.

Treatment of public place general waste bin contents prior to disposal to landfill is unlikely to be a viable solution.

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



The City of Yarra introduced post-collection sorting to their public general waste bins in inner-east Melbourne back in 2008. The material was initially sorted at the SMRF. However, this had to cease operation as the waste material became too contaminated for the MRF to be able to deal with and this service no longer operates.

Recommendation 9: The State Government should gather data on the tonnes of waste disposed in the public realm to inform future strategies in this area. Funds raised from the solid waste levy could be used for the purpose of establishing a tracking and measurement system for public place waste management.

Key area 4: Supporting a strong market for recovered resources

Circular procurement

In principle the City of Marion is not opposed to this idea but would need to better understand the implications and proposed approach for tracking and measurement as the topic is not well-defined in the discussion paper.

Taxes or other similar instruments need to be imposed to prioritise or mandate the use of recycled plastic over virgin plastic inputs into products.

Recommendation 10: Mandatory targets for use of recycled content in products purchased should be established in a state-level procurement and/or regulatory framework to drive demand for products containing recycled content and to support strong markets.

A whole-of-government circular procurement policy may be more appropriate at a state level, but insights gained at the local level, the LGA's 'Buy it Back' circular procurement project found that incorporating sustainable procurement within a council's procurement policy facilitated stronger adoption across different council departments and provided greater consistency for suppliers and tenderers.

A circular procurement mandate for businesses would need to focus on large businesses, as smaller businesses need support and resources rather than regulation.

The Victorian State Government example illustrates the effectiveness of State Government policy and strategy driving demand for recycled content with a strategic planning approach, involving collaboration between State Government, local government, construction industry and recycling industry.

Prohibited landfill waste items

Clothing textiles should not be banned or prohibited at this point as the processing technology is not yet available anywhere for recycling numerous fibre types. It is too soon to regulate this with a ban.

Banning **single-use alkaline batteries** is supported, this ban adds to the consistency of messaging for community education. The EPA should be better resourcing the ban on

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



batteries and other electrical waste, for example by targeting the building and construction sector, especially electricians. It is clear from previous kerbside waste audit photos that items such as batteries from smoke detectors are placed in household bins.

Accessible disposal pathways for households to dispose safely of **lithium-ion batteries** are needed as a matter of priority.

The absence of readily accessible drop-off points in the community for e-waste containing lithium-ion batteries leads many households to place these items in their kerbside bins at home.

The Unplug N' Drop e-waste recycling service provided by Electronic Recycling Australia (ERA) has increasingly struggled to keep up with operational costs and have subsequently withdrawn a significant number of e-waste drop-off points across metropolitan Adelaide. This is particularly noticeable in southern Adelaide which is a distance away from ERA's base of operations at Ottoway.

The Bunnings Marion drop-off point at Westfield Marion Shopping Centre was their busiest collection site when ERA first started Unplug N' Drop in 2017. However, this drop-off location closed in 2020 due to donations exceeding operational capacity to collect and process 200 tonnes per year at a processing cost of around \$300 per tonne from one single collection cage. Three or four additional collection points around the City of Marion have also closed in the last few years, leaving a significant gap in service accessibility.

ERA's service model demonstrates that the community are educated about the need to recycle their e-waste and willing to manage their e-waste responsibly if there is an accessible drop-off point available for free and safe disposal.

E-waste is the fastest growing waste stream in Australia and globally. Accessible recycling locations for these materials are required as a matter of urgency.

Recommendation 11: As a matter of urgency and community safety, the ban of e-waste in the current W2R EPP requires sufficient resourcing by the EPA to ensure safe and accessible disposal options for e-waste materials, particularly li-ion batteries.

While **solar panels** would be defined as e-waste, banning them from landfill without the availability of other pathways for disposal would be problematic and would likely fail to achieve the aim of landfill diversion and resource recovery. There is also the issue of reuse and repair, which should also extend to solar panels. The establishment of a second-hand PV market in SA could be developed, incorporating a certification process. Importantly, there is a need for companies to disclose full details of reuse and recycling. For example, if a solar panel company claims their old panels are "sent to Africa for reuse" they need to be able to elaborate on this further with some facts to support their claims.

The City of Marion agrees with the proposal to ban **mattresses** from landfill. There are readily available options for reuse, recycling and disposal, and a ban would hold businesses to better account.

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



Product stewardship for mattresses is needed as a priority, which should not come at a cost to ratepayers. Last financial year, City of Marion collected 3,300 mattresses (from both illegal dumping and booked collections). With the cost-of-living crisis, the illegal dumping of mattresses is likely to increase further.

The minimum requirement for mattress recycling should be metal and steel recovery due to its high material value. The textile and latex components of mattresses may need further investigation prior to regulation.

Another material which the EPA could consider banning is expanded polystyrene (EPS) to put industry on notice to use other alternative products such as moulded cardboard, compostable corn starch packing beads, or shredded paper for parcel protection. EPS continues to be a significant contaminant in kerbside recycling bins and is particularly problematic in the collection trucks when compacted into pieces and sticking to other materials. Community education has reached its maximum impact on this point, however the plastics identification code for EPS is still mistaken by many South Australians as kerbside recycling advice.

Key area 5: Protecting the environment and human health from waste pollution

The City of Marion looks forward to receiving advice from the EPA on PFAS-related issues to support best practice management of environmental risks.

Key area 6: Circular economy metrics, reporting and transparency

Monitoring and targets are an important part of measuring and tracking circular economy advancements. The City of Marion supports the ongoing measurement and reporting of waste and resource recovery from the design to disposal of products, materials and resources.

Council agrees that waste depots should be more publicly transparent about the materials they process, recovery and recycling rates, and what happens to the materials they process. This would increase public confidence and therefore participation in recycling by households and hold businesses more accountable the validity of their recycling claims.

Reporting by local government

Reporting in kerbside collection performance

The City of Marion is happy to provide the report data on areas where reporting is collected and believes the information sought by GISA is already available and accessible, including disposal and diversion tonnages of kerbside waste streams, hard waste and illegal dumping.

Annual reporting is practical and appropriate, as the monthly data is immaterial, and aligns with existing reporting which the City of Marion currently provides annually to:

- Local Government Grants Commission – number of properties over different types, residential and commercial services offered, annual tonnages including hard waste

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



and illegal dumping, where our waste streams go for processing, locations and travel distances to processing and disposal sites.

- GISA – month-by month tonnages reported once a year on the three-bin systems, hard waste and illegal dumping. The City of Marion provides this information voluntarily to GISA.
- 2. EPA – annual recycling report on used packaging materials – tonnages of co-mingled recycling material streams is shared from the SMRF, along with number of residential and commercial premises, average cost of the recycling service, average bin presentation rate.

We disagree on benchmarking council kerbside performance against each other due to variance in community demographics and available council resources. The City of Marion actively collaborates with neighbouring councils and in regional council partnerships to address gaps in waste reduction strategies and activities. For example, the following educational resources have been developed from cross-collaborations:

- [Beyond the Bin animation](#) for pre-school and primary school education.
- [Kitchen to compost - the green organics process explained](#) for adult community education.

Standardising kerbside waste collection bin audits

Consistency of method across kerbside audits is valuable in principle. However, practical considerations need to include:

- Contractual obligations of waste collection contractors. The City of Marion has a long-standing contractual arrangement which requires its waste collection service provider to provide a set amount of funding every two years for the purpose of conducting a kerbside waste audit. This agreement is in place until 30 April 2027 and is anticipated to continue. Consequently, Council does not have a dedicated budget for kerbside waste audits.
- Flexibility regarding audit inclusions to manage unforeseeable cost increases. This year, the fixed two-year amount stipulated in our funding contract did not fully cover the initial quoted cost for the audit we conducted in May 2024, which had substantially increased from the cost of the last audit in May 2022. Because of this, we had to scale back on some audit elements that were not deemed to be essential at that point in time, such as bin presentation rates and bin fullness. If the cost of kerbside waste audits further increases beyond available budget set out in our contract, Council may have to leave the next audit for 3 years.
- Availability of audit service providers and implications for data integrity. There are only two or three service providers in South Australia able to provide this service, and any increase in demand for their services arising from mandatory reporting would limit or prohibit our ability to access the relevant data at the relevant time to maintain trend data reliability over time. Trend data from kerbside audits is most effective when it is gathered at the same time of year due to seasonal variations. If the service providers become fully booked most of the year due to increased reporting requirements, there may be councils that despite a preference for timing their audit as per best practice, may have no other alternative than to conduct their

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



audits at different times of year which makes data sets incompatible for comparison. Comparing data from summer holiday season with mid-winter would be incompatible data sets for discerning trends over time.

Recommendation 12: In favour of capacity-building and support to councils over regulation, the City of Marion requests that GISA update the guidelines for best practice kerbside waste audits which is overdue for renewal to achieve the desired outcome in kerbside audit data consistency.

Publishing waste management plans and performance outcomes

City of Marion does not have a stand-alone waste plan or strategy, as past governance audits have resulted in Council limiting the number of plans for better tracking of progress against strategic directions, targets and corporate KPIs. Due to the number and breadth of services provided by local government, it is impractical to have a separate plan for every service we provide to the community. Our waste-related strategies are published within the Council's 10-year Strategic Plan, 4-year Business Plans and Annual Business Plans on the City of Marion website.

Waste-related performance outcomes including annual kerbside collection tonnages and diversion rate are also shared with our community in the annual Environment Report Card.⁹

Publishing waste contract tendering information publicly

This would not be beneficial to the providers submitting tenders due to commercial in confidence. Council does not make tendering information publicly available for other contracts, and the rationale for doing this in relation to waste contracts is unclear in the discussion paper and needs to be further justified.

The City of Marion's procurement policy¹⁰ contains principles for environmental management, use of local contractors and sustainable procurement. This is the most appropriate tool for managing these elements of decision-making in relation to waste contracts and kerbside performance.

Additional comments

W2R EPP Impacts

1. The most significant impact of the current W2R EPP on the City of Marion is the inability to provide a more sustainable, cost-effective kerbside collection service that better meets the objectives of this policy, the needs of our community and waste generation, due to the weekly waste collection mandate.
3. This is an ambitious list of ideas put forward in the EPA's discussion paper. Further information needs to be provided on the anticipated roles and responsibilities of the

⁹ <https://www.marion.sa.gov.au/services-we-offer/environment/environmental-planning/environment-report-card>

¹⁰ https://www.marion.sa.gov.au/assets/sp/Procurement-and-Contract-Management-Policy_2023-07-24-062050_fooy.pdf

W2R EPP Review

Submission on the EPA SA discussion paper
Beyond recycling: Moving SA towards a circular economy

DECEMBER 2024



- EPA, GISA and local governments, consideration of how additional regulatory requirements would be resourced and financial impacts on councils.
4. The EPA might also consider a review clause in the updated policy, such as a review every 8 years to maintain its currency and render the reviews more manageable in size and scope.
 2. Council already carries significant financial burdens in waste and recycling community education and illegal dumping management of e-waste, which was banned by the State Government but without support to councils for enforcement.
 5. Reflecting on the issues in the community with safe and accessible disposal of e-waste in the years following the EPA's prohibition of e-waste from landfill, the EPA must more carefully investigate the ideas raised in the discussion paper to understand the potential for unintended consequences of regulation with sufficient resourcing or support to make it effective.
 6. A key theme evident in the recommendations provided in City of Marion's submission is the importance of education and behaviour-changing incentives to influence waste disposal behaviour in the community.

Recommendation 13: Further information needs to be provided on the anticipated roles and responsibilities of the EPA, GISA and local governments, consideration of how additional regulatory requirements would be resourced and financial impacts on councils which ultimately places further pressure on rates.

END

12.2 Public Art Strategy - Interim Report

Report Reference	GC250128R12.2
Originating Officer	Public Art and Place Coordinator – Joyce Louey
Corporate Manager	Manager City Activation - Charmaine Hughes
General Manager	General Manager City Development - Ben Keen

REPORT OBJECTIVE

To advise Council that the creation of the draft Public Art Strategy and Action Plan 2025-2030 is progressing, and these documents will be provided to Council 25 March 2025 for endorsement.

REPORT HISTORY

GC240528R12.2 Public Art Strategy

DISCUSSION

In November 2024, Administration presented an update on progress in developing a Public Art Strategy. Council requested that a report outlining the Public Art Strategy and Action Plan be brought back in January 2025 for endorsement.

Whilst development of the Strategy is progressing well, further time is required to review consultation feedback and to finalise the Strategy. It is therefore proposed that the draft Public Art Strategy and Action Plan 2025-2030 be presented at the General Council meeting on 25 March 2025 for endorsement for community consultation.

The creation of a five-year Public Art Strategy will:

- form a vision and purpose for commissioning public art;
- form a key corporate document supporting the goals and actions defined in the Council's Community Vision of a liveable, sustainable community;
- make our places more welcoming, safe, and activated;
- form a framework for responsible, targeted investment in public art.

RECOMMENDATION

That Council:

- 1. Notes that the draft Public Art Strategy and Action Plan 2025-2030 will be presented at the 25 March 2025 General Council Meeting.**

12.3 LGA Ordinary General Meeting 2025 - Call for Items of Business

Report Reference	GC250128R12.3
Originating Officer	Governance Officer – Amey Johnson
Corporate Manager	Manager Office of the Chief Executive - Sarah Vinall
General Manager	Chief Executive Officer - Tony Harrison

REPORT OBJECTIVE

The purpose of this report is to consider Notice of Motions for forwarding to the Local Government Association (LGA) for consideration at the LGA Ordinary General Meeting (OGM) 2025 and to nominate a voting delegate.

EXECUTIVE SUMMARY

Member councils are invited to submit proposed items of business to be considered by SAROC, GAROC or the LGA Board of Directors for inclusion on the agenda of the General Meeting.

The LGA Ordinary General Meeting will be held on **Friday 23 May 2025** at a venue yet to be confirmed.

In order for items of business to be considered for the Ordinary General Meeting, proposed items must be received by the LGA no later than **Friday 7 February 2025**.

Any Council Member can attend the LGA OGM but Council must have a voting delegate determined by Council resolution. The current voting delegate for the LGA General Meeting is Mayor Hanna. Councillor Luscombe was nominated as proxy delegate for the 2024 LGA Annual General Meeting. Council will need to resolve the voting delegates and advise the LGA accordingly.

RECOMMENDATION

That:

1. **The nominated Council Voting Delegate for the 2025 Local Government Association Ordinary General Meeting is Mayor Hanna and the Proxy Delegate for this meeting is Councillor xx**
2. **Council submits the following motion for consideration at the LGA Ordinary General Meeting 2024:**
 - a. *That the Ordinary General Meeting requests the LGA to*

or

3. **Notes the report *LGA Ordinary General Meeting 2025 – call for items of business* and that no items of business were received from Council Members for submission to the LGA.**

DISCUSSION

The LGA has released a call for items of business for the LGA Ordinary General Meeting on 23 May 2025. In preparation for the meeting, the LGA has advised Councils of the following information:

Items of Business

The purpose of the General Meeting is to consider items of strategic importance to local government and

the LGA, as recommended by South Australian Region Organisation of Councils (SAROC), Greater Adelaide Region Organisation of Councils (GAROC) or the LGA Board of Directors.

Member councils may at any time throughout the year propose an item of business for a General Meeting. To submit a proposal Council needs to complete the LGA General Meeting – Proposed Item of Business form (**Attachment 1**). Proposals should be accompanied by sufficient supporting information to assist SAROC, GAROC and the Board of Directors to make informed decisions and recommendations. Councils are encouraged to discuss proposed items of business with the LGA secretariat prior to being submitted.

It is at the discretion of Council whether to refer an item to GAROC or the Board of Directors. Guidelines on how proposed items of business will be considered are attached (**Attachment 2**).

In order for items of business to be considered for the General Meeting, proposals must be received by the LGA no later than Friday 7 February 2025. All proposed items will then be considered by either SAROC, GAROC or the LGA Board of Directors and must be approved by them for inclusion in the agenda for the Ordinary General Meeting. The agenda will be provided to councils at least 20 days prior to the meeting.

It is suggested that upon resolving to submit any items of business to the LGA, the Chief Executive Officer be authorised to amend the wording (without changing the meaning or purpose of the motion) if required.

Council Members were advised via email on 7 January 2025 of the Call for proposed items and were asked to submit any items for consideration to Administration by 12 noon 14 January 2025. There were no proposed items submitted by Members.

Voting Delegate

At the City of Marion, historically the Mayor has been the Voting Delegate and the Deputy Mayor has been the proxy unless they have been unable to attend the meeting. Pursuant to Rule 36 of the LGA Constitution, only persons who are Council Members are eligible to be a Voting Delegate, therefore all Council Members are eligible to be the Voting Delegate or Proxy.

The current Voting Delegate is Mayor Hanna and the previous Proxy was Councillor Luscombe. Unless contrary advice is provided to the LGA, the above-nominated Voting delegate will remain Mayor Hanna. Council will need to determine a Proxy. Councils may appoint new voting delegates by notifying the LGA via the Voting Delegate Form (**Attachment 3**).

In Summary

- Proposed items of business are due to the LGA by Friday 7 February 2025.
- Council must advise the LGA of Voting Delegates.

ATTACHMENTS

1. LGA General Meeting- Proposed Item of Business form [**12.3.1** - 2 pages]
2. Guidelines - Proposed Items of Business for LGA General Meetings [**12.3.2** - 5 pages]
3. Notification of Appointment of Council Delegate [**12.3.3** - 1 page]

LGA General Meeting – Proposed Item of Business

The purpose of this form is to request consideration by SAROC, GAROC or the Board of Directors of an item of business to be included on the agenda of an LGA General Meeting - refer Clause 16.3.1 of the LGA Constitution. Prior to submitting a proposed Item of Business, please refer to the Considering Proposed Items of Business for LGA General Meetings Guidelines.

Council Name	
The body the item is being referred to <i>Proposals may only be submitted to the ROC of which council is a member, or to the LGA Board of Directors.</i>	Board of Directors <u>OR</u> SAROC <u>OR</u> GAROC (<i>choose only one</i>)
Subject of the proposed item of business	
Proposed motion for the General Meeting	That the Annual / Ordinary General Meeting requests the LGA to
Supporting information <i>Provide a summary of the issue(s), relevant background information, description of the impact on the sector and evidence that this is an item of strategic importance to local government.</i>	
Regional LGA <i>(Information requested from councils in SAROC only)</i> <i>Advise if this item has been considered by your RLGA and outcome of discussion</i>	
LGA Policy Manual <i>Does this item require a change to the LGA Policy Manual (new policy or amendment to existing policy)?</i>	(please click here to view the LGA Policy Manual)
LGA Strategic Plan reference	(please click here to view the plan and identify the Key Initiative and Strategy reference) <i>(choose only one Key Initiative and one Strategy)</i>
Council Contact Officer submitting form	(insert name) (insert email address) (insert telephone number)
Council Meeting minute reference and date of meeting	



The voice of local government.

Date submitted to LGA	
-----------------------	--

Please return Word version of completed form to lgasa@lga.sa.gov.au.
Refer to [LGA OGM/AGM Webpage](#) in respect to deadlines for upcoming General Meetings.

Considering Proposed Items of Business for LGA General Meetings

Guidelines

February 2019

Version 1

Introduction

The Local Government Association of South Australia (LGA) schedules two General Meetings each year for member councils to consider items of strategic importance to local government and the LGA. Proposing and voting on items of business for a General Meeting is one of the important ways that member councils participate in the development of policy and strategy on issues and influence the advocacy agenda for local government in matters affecting councils and their communities.

These guidelines have been prepared to assist the LGA Board of Directors (Board), South Australian Region Organisation of Councils (SAROC) and Greater Adelaide Region Organisation of Council (GAROC) to consider the items of business to be placed upon an agenda for an LGA Ordinary or Annual General Meeting. They also provide guidance to member councils to develop and prioritise proposals to submit for consideration.

The *Considering Proposed Items of Business for LGA General Meetings* Guidelines may be reviewed and amended by the LGA Board of Directors from time to time.

LGA Constitution

Section 16 of the LGA Constitution provides guidance about the matters to be discussed at a General Meeting, and the process by which items of business may be proposed for inclusion on the agenda. The requirements of Section 16 are outlined below.

16. Business of General Meetings

- 16.1 *The business of a General Meeting will be to consider items of strategic importance to local government and the LGA as recommended by SAROC, GAROC or the Board of Directors and matters which must be determined under this Constitution at a General Meeting.*
- 16.2 *Any Member may propose an item of business for an Annual General Meeting or an Ordinary General Meeting to SAROC, GAROC or the Board of Directors.*
- 16.3 *No business shall be brought before a General Meeting of the LGA unless:*
 - 16.3.1 *it has been placed on the agenda of an Annual General Meeting or an Ordinary General Meeting by SAROC, GAROC or the Board of Directors taking into account the purpose of a General Meeting set out in clause 16.1; or*
 - 16.3.2 *the business is as stated in the notice of a Special General Meeting, given in accordance with clause 10.*

In summary, the Constitution provides all member councils with the opportunity to submit a proposed item of business to the Board, SAROC or GAROC for approval to be placed on the agenda of a General Meeting. No item of business will be placed upon the agenda for a General Meeting unless it has been approved by one of the relevant bodies, which must consider whether a matter is of '*strategic importance*' to local government and the LGA'.

Relevant bodies

As outlined in the Constitution, a member council may propose an item of business to SAROC, GAROC or the Board of Directors. This opportunity is also enshrined within the LGA Membership Proposition, which outlines the rights of members to participate in the development of LGA policy and strategy.

While the Constitution refers to members being able to refer items directly to the Board, the Membership Proposition specifically provides for members referring matters relating to policy and strategy development to either SAROC or GAROC (as relevant).

To provide greater clarity to members about the best pathway for submitting an item of business, the following guidance is provided.

LGA Board of Directors

Items should be referred to the Board if related to:

- the LGA Constitution or Ancillary Documents
- a subsidiary of the LGA
- a commercial service provided (or proposed to be provided) by the LGA
- an activity requiring the allocation of significant resources by the LGA
- any LGA operational matter

SAROC or GAROC

Items should be referred to the relevant ROC if related to:

- the development of LGA policy and strategy
- LGA advocacy activities
- an amendment or addition to the LGA Policy Manual
- an operational matter related to SAROC or GAROC

The Board, SAROC and GAROC may choose to refer items submitted by member councils to each other for advice or consideration. Such referrals will be at the discretion of the Board, SAROC and GAROC.

Guiding principles

The following guiding principles have been developed to provide clarity and consistency to the Board, SAROC, GAROC and member councils about the relevant matters that will be considered in determining whether an item of business will be placed on the agenda of a General Meeting.

1. Strategic importance

The matters discussed at General Meetings should be of strategic importance to local government and the LGA. The policies and activities that are resolved at the LGA General Meetings are important in guiding the priorities and work plans of the LGA, and it is important that the association's resources are focussed on the issues that will be of the greatest benefit to councils and communities.

In determining whether a matter is of strategic importance to local government and the LGA, the Board, SAROC and GAROC will consider:

- whether the item has relevance to and will benefit a particular group (eg regional or metro councils) or the sector as a whole;
- alignment with the strategic plans and business plans of the LGA, SAROC and GAROC;
- the level of urgency required to deal with the issue;
- relevance to the role of local government and the potential positive and negative impacts of the issue on councils and communities;

- whether there are other bodies or industry groups that are better placed to address the issue or undertake the proposed activity; and
- the resources required to execute the policies or activities.

2. Supporting evidence

Good public policy positions need to be supported by solid evidence that the issues are well understood and that the proposed course of action provides the most efficient and effective solution. A strong evidence base is critical to successful advocacy, particularly when trying to change government policy, influence public opinion or attract additional funding.

The Board, SAROC and GAROC will consider whether there is sufficient evidence provided in support of the policy position or course of action being sought. In some instances, an item may be referred back to the submitting council with a request for further information.

In many cases the evidence needed to support a position might not be readily available. In these circumstances it is best for a motion to seek further investigation of an issue and/or further consultation with councils, rather than seeking endorsement of a specific policy position or action. The Board, SAROC and GAROC may propose an alternative course of action, in consultation with the submitting council.

3. Alignment with LGA policy

The LGA Policy Manual is a compendium of principles and policies that have been developed and endorsed by a majority vote of member councils at previous General Meetings. There are a wide range of policies addressing a number of priority issues for the sector.

The policies act as a guide for advocacy and best practice in the sector. In most cases, the LGA Policy Manual can provide councils with a broad direction on how an issue can be resolved and whether further development of a policy position is required.

The Board, SAROC and GAROC will consider the LGA Policy Manual in determining whether a new or amended policy position is required to be endorsed by members to enable the LGA to take the requested action. If the LGA already has a supportive policy position in relation to the proposed item, further consideration by members at a General Meeting may not be required.

4. Resourcing

In some cases, the items of business put forward by members require significant resources to be allocated in order to achieve the desired outcome. Resources may not be available through the LGA to tackle every issue.

Before determining to place an item on the agenda of a General Meeting; the Board, SAROC and GAROC will consider:

- whether resources are available within the LGA to achieve the desired outcome;
- other resources that may be available;
- potential impacts on the LGA budget and business plan; and
- the level of input that will be required by councils or other stakeholders to progress the item.

The Board, SAROC and GAROC may determine not to proceed with (or defer) an item of business if the resourcing required would detract from the achievement of outcomes of greater priority for members.

Determinations by the Board, SAROC and GAROC

After considering a proposed item of business against these guiding principles and having regard to any other relevant factors, the Board, SAROC and GAROC may determine to:

- approve an item of business for inclusion on the agenda of a General Meeting;
- approve an amended item of business for inclusion on the agenda of a General Meeting (in consultation with the submitting councils);
- take no further action;
- request additional information from the submitting council;
- refer an item back to the submitting council or regional LGA for action if it relates to a local or regional issue;
- resolve that the matter be dealt with by the LGA, SAROC or GAROC without progressing to a General Meeting (such as matters requiring urgent attention or actions that can be progressed immediately due to alignment with existing policies and work plans); or
- defer the item to a future General Meeting

The submitting council will be advised in writing of the determination of their proposed item of business.

Helping local government
build stronger communities.

Notification of Appointment of Council Delegate

The purpose of this form is to notify LGA of a change to council's appointed delegate on the LGA's Register of Voting Delegates.

Under the LGA Constitution (Clause 12) to be eligible for appointment as a delegate, a person must be a Council Member. Each Council may appoint a person to act as the delegate at the General Meeting.

Council name	<i>(insert Council name)</i>
Council delegate	Mayor / Councillor <i>(insert full name)</i>
Council resolution	<i>(insert date & resolution no.)</i> <i>(insert council resolution)</i>
Name and signature of Chief Executive Officer	Signature: <i>(insert CEO name)</i>
Date	<i>(insert date)</i>

Please return completed form to lgasa@lga.sa.gov.au.

If the council's registered delegate is unable to attend a specific General Meeting a temporary delegate may be appointed for that one meeting only by submitting a *Notification of Appointment of Substitute Council Delegate* form available on the [LGA website](#).

13.1 Monthly Work Health and Safety Report

Report Reference	GC25012813.1
Originating Officer	Unit Manager WHS – Mark Jentsch
Corporate Manager	Manager People and Culture - Kate McKenzie
General Manager	Chief Executive Officer - Tony Harrison

REPORT OBJECTIVE

To inform Council of Work Health and Safety performance indicators.

EXECUTIVE SUMMARY

City of Marion continues to maintain low injury rates across its operational areas. One Lost Time Injury has been recorded for the year resulting in the current Lost Time Injury Frequency Rate (LTIFR) of 3.0. This is considerably lower than the 6.7 LTIFR average for comparable Councils.

RECOMMENDATION

That Council:

1. Note this report

DISCUSSION

Historical statistics inform us that when there is a healthy culture of proactive Hazard/Near Miss Reporting, there is a consequential reduction in injuries to workers. Hazards and Report Only (Near Misses) are reported to date for this financial year and are outlined in Tables 1 & 2. They can be compared against those reported last financial year which are outlined in Table 3 & 4.

Table 1: Hazard Reports - Financial Year 2024/25

Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Total	Ave
1	5	3	3	1	2							15	2.5

Table 2: Report Only - Financial Year 2024/25

Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Total	Ave
6	5	16	4	2	2							35	5.8

Table 3: Hazard Reports - Financial Year 2023/24

Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Total	Ave
3	0	3	1	5	2	2	5	3	0	5	1	30	2.5

Table 4: Report Only - Financial Year 2023/24

Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Total	Ave
1	2	1	3	5	2	1	3	3	6	6	3	36	3

Lost Time Injuries Reported (Skytrust reporting data)

Lost Time Injuries (LTI's) are those injuries where a whole work day or shift has been lost due to a workplace injury. LTI's reported to date for this financial year are presented in Table 5 and can be compared against those reported last financial year which are presented in Table 6.

Table 7 provides descriptions of the LTI's for the current financial year.

Table 5: Number of LTI's per month - Financial Year 2024/25

Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Total
0	0	0	1	0	0	0	0	0	0	0	0	1

Table 6: Number of LTIs per month - Financial Year 2023/24

Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Total
0	0	0	0	0	0	1	1	0	0	0	0	2

Table 7: Outline of LTIs reported - Financial Year 2024/25

No.	Description of Incident	Mechanism of Injury	Injury Description
1	Using quick cut in order to cut down SEP pit for new surround.	Muscular Stress while handling object other than lifting carrying putting down	Pain in lower back

Lost Time Injury Frequency Rate (Skytrust reporting data)

The Lost Time Injury Frequency Rate (LTIFR) is a measure of the occurrence of Lost Time Injuries per million hours worked. The current financial year LTIFR for the CoM is 3.0; tracking above the annual target of 2.34.

Rolling Average Lost Time Injury Frequency Rate (Skytrust reporting data)

Rolling Average LTIFR is a measure of the LTIFR trend over rolling 12 month reporting period.

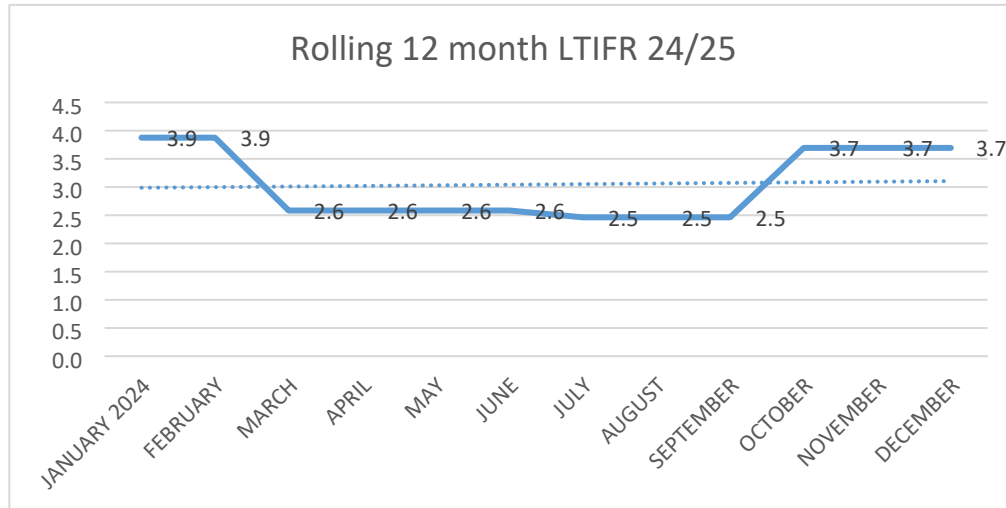


Figure 1: Rolling LTIFR over 12 months

Rolling Total Recordable Injury Frequency Rate (SkyTrust reporting data)

Total Recordable Incidents include fatalities, LTI's and incidents resulting in the employee receiving medical treatment and/or is certified as only fit to undertake suitable duties. The Rolling Total Recordable Incident Frequency Rate (TRIFR) provides analysis of the TRIFR over the last 12 months.

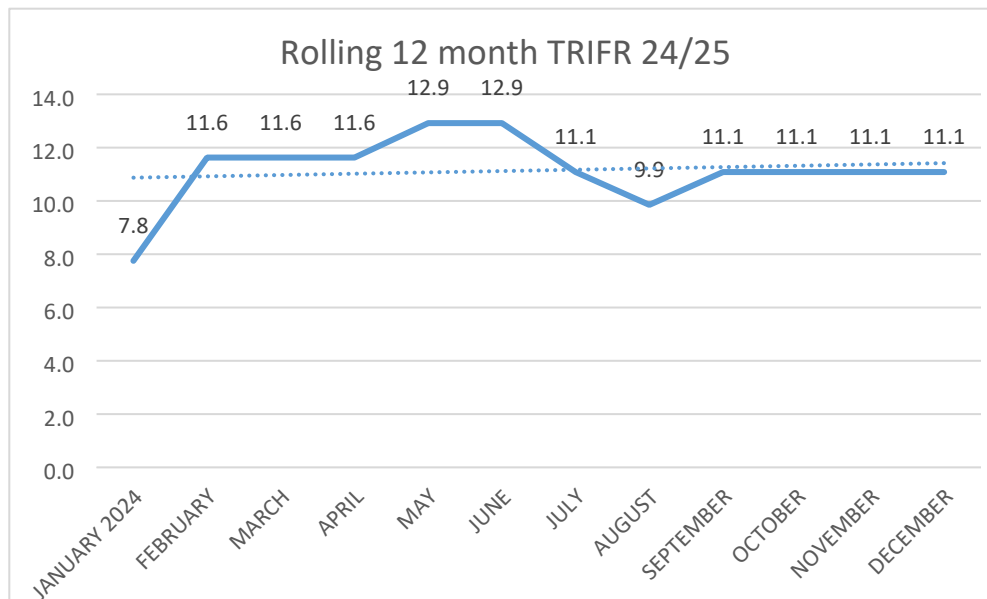


Figure 2: Rolling TRIFR over 12 months

ATTACHMENTS

Nil

13.2 Finance Report - December 2024

Report Reference	GC250128R13.2
Originating Officer	Assistant Financial Accountant – Kaedan O'Neill
Corporate Manager	Chief Financial Officer – Ray Barnwell
General Manager	General Manager Corporate Services – Tony Lines

REPORT OBJECTIVE

This report provides Council with information relating to the management of financial resources under its control as of December 2024. This report is one of a series of reports designed to assist Council in achieving and maintaining a financially sustainable position. Other reports assisting in this process include the Quarterly Budget Reviews and the Long-Term Financial Plan.

This report includes financial information regarding major projects. The principles used for the assessment of reportable projects are:

- Council has agreed to proceed with the project and approved a Prudential Report under Section 48 of the *Local Government Act* 1999.
- The Whole-of-Life Cost is greater than \$5.4 million dollars (including grant assisted projects).

RECOMMENDATION

That Council:

1. **Notes the report.**

DISCUSSION

This report is presented on a regular basis to provide Council Members with key financial information to assist in monitoring Council's financial performance against budget.

ATTACHMENTS

1. Attachment 1 - Funding Statement - Actual versus Budget Dec 24 [**13.2.1** - 3 pages]
2. Attachment 2 - Capital Works Dec 24 [**13.2.2** - 7 pages]
3. Attachment 3 - Sundry Debtors and Rates Dec 24 [**13.2.3** - 2 pages]

APPENDIX 1

Funding Statement – Actual versus Budget

The Funding Statement provides a view of Council's financial performance against the approved budget and is consistent with the information provided at budget reviews. It provides a review against all of the elements contained within the Statement of Comprehensive Income and the Statement of Financial Position that are adopted as part of the Annual Budget Report. It details Council's:

Statement of Comprehensive Income -

The operating result is recognised as one of Council's key financial indicators. The budget framework includes a commitment to its ongoing Financial Sustainability maintaining an Operating Surplus Ratio of between 0% and 10%, on average over each five-year period, which for 2024-2025 means a targeted operating surplus of between \$0 and \$11.496M.

Comment: Council currently has a net operating surplus result of \$0.867M before capital revenues, against a year to date forecast operating surplus budget of \$2.735M. The 2024-2025 annual budget forecasts a net cash surplus of \$443,000. This position is detailed in the attached Funding Statement and variation notes.

**Capital Budget -
\$46.669M**

The Capital Budget is linked to Council's key financial indicator – "Asset Renewal Funding Ratio" and an actual to budget comparison reflects Council's progress in achieving its Capital program.

Comment: The actual to budget position reveals that 74.73% of the year to date Capital Renewal Budget has been spent.

Loans -

The loans component of the Funding Statement identifies any new proposed loan receipts or principal payments. Council's borrowings are included in Council's key financial indicator – "Net Financial Liabilities" which reflects Council's total indebtedness.

Comment: \$10.486M of new borrowings and \$0.657M of principal repayment are budgeted for 2024-2025, meaning that the overall loan liability balance is forecast to increase by \$9.829M to \$11.587M by 30 June 2025. To date this loan has not been required.

Cash will be utilised to fund expenditure within the context of Treasury Management to ensure loans are not drawn down where temporary cash holdings are available.

Reserves & Cash -

Various fund movements such as surplus budget review results, unspent grants and carryover projects at year end are reflected as transfers to reserves, whilst utilisation of reserve funds are recognised as transfers from reserves.

Comment: Council's adopted budget for 2024-2025 includes Transfer to Reserves of \$0.059M and Transfers from Reserves of \$15.034M, after accounting for amounts quarantined for specific projects or works, the below funds are available for use for the following purposes:

Asset Sustainability Reserve (ASR)	\$2.573M
Open Space Reserve	\$2.132M
Total	<u>\$4.705M</u>

The net budgeted transfer from reserves for 2024-2025 is \$14.975M.

The 2024-2025 1st Budget Review forecasts a net cash surplus of \$0.443M.

**Funding Statement
as at 31 December 2024**

Original Adopted Budget	Carryovers	Budget Review Adjustments		YTD Actual	YTD Budget	YTD Variance	Annual Budget	Note
\$'000	\$'000	\$'000		\$'000	\$'000	\$'000	\$'000	
Operating Revenue								
94,823	-	(39)	Rates	47,317	47,353	(36)	U	94,784
2,738	-	5	Statutory Charges	1,721	1,647	74	F	2,743
4,164	-	(57)	User Charges	1,858	1,895	(37)	U	4,107
9,174	69	1,074	Operating Grants & Subsidies	6,613	6,523	90	F	10,318
300	-	-	Investment Income	308	196	112	F	300
1,020	-	111	Reimbursements	517	437	80	F	1,131
668	122	138	Other Revenues	323	642	(319)	U	928
645	-	-	Net gain - Equity Accounted Investments	-	-	-	-	645
113,533	191	1,233		58,657	58,693	(36)	U	114,956
Operating Expenses								
46,610	-	698	Employee Costs	23,257	22,647	(610)	U	47,308
30,533	3,128	716	Contractual Services	16,378	15,262	(1,116)	U	34,377
6,460	-	93	Materials	2,710	2,490	(219)	U	6,553
359	-	-	Finance Charges	50	182	132	F	359
21,100	-	498	Depreciation	10,799	10,799	-	-	21,598
8,385	-	348	Other Expenses	4,597	4,577	(19)	U	8,733
113,447	3,128	2,353		57,790	55,958	(1,832)	U	118,928
86	(2,937)	(1,121)	Operating Surplus/(Deficit) before Capital Revenues	867	2,735	(1,868)	U	(3,972)
Capital Revenue								
2,642	2,293	40	Capital Grants & Subsidies	758	739	19	F	4,975
-	-	-	Contributed Assets	40	-	40	F	-
2,642	2,293	40		798	739	59	F	4,975
2,727	(644)	(1,081)	Net Surplus/(Deficit) resulting from operations	1,665	3,475	(1,809)	U	1,003
21,100	-	498	add Depreciation	10,799	10,799	-	-	21,598
(645)	-	-	less Share of Profit Equity Accounted Investment	-	-	-	-	(645)
23,182	(644)	(582)	Funding available for Capital Investment	12,464	14,273	(1,809)	U	21,956
Capital								
15,314	1,765	(351)	less Capital Expenditure - Renewal	4,580	6,128	1,549	F	16,728
19,488	11,078	(625)	less Capital Expenditure - New	8,869	11,341	2,471	F	29,941
-	-	-	less Capital - Contributed assets	40	-	40	U	-
(353)	-	-	add Proceeds from Sale of Assets	(360)	(175)	185	F	(353)
(11,266)	(13,487)	392	Net funding increase/(decrease)	(666)	(3,021)	2,355	F	(24,361)
Funded by								
Loans								
9,500	-	986	Loan Principal Receipts (Net)	-	-	-	-	10,486
(657)	-	-	Loan Principal Repayments	(152)	(152)	-	-	(657)
8,843	-	986	Loan Funding (Net)	(152)	(152)	-	-	9,829
Movement in level of cash, investments and accruals								
49	-	394	Cash Surplus/(Deficit) funding requirements	14,157	11,802	2,355	-	443
(2,473)	(13,487)	985	Reserves Net - Transfer to/(Transfer from)	(14,975)	(14,975)	-	-	(14,975)
(2,424)	(13,487)	1,379	Cash/Investments/Accruals Funding	(818)	(3,173)	2,355	-	(14,532)
11,266	13,487	(392)	Funding Transactions	666	3,021	(2,355)	F	24,361

Variation Notes

	Category	Variance - Favourable/ (Unfavourable)	Variance - Budget Timing	Comment
A	Investment Income Favourable \$112k	\$112k		Relates to investment income being greater than budget.
		\$112k	\$000k	
B	Other Revenues Unfavourable (\$319k)		(\$319k)	Relates to a number of variances which are individually insignificant.
		\$000k	(\$319k)	
C	Employee Costs Unfavourable (\$610k)		(\$610k)	Predominantly reflects budget-timing variances in addition to a lower vacancy rate than forecast.
		\$000k	(\$610k)	
D	Contractual Services Unfavourable (\$1,116k)	(\$383k)		Reflects unbudgeted expenditure in relation to the Marino Hall.
			(\$262k)	Reflects budget-timing with regards to Annual IT Licenses paid in advance.
			(\$238k)	Relates to the classification of budget between operating and capital for the Coastal Walkway Grey Gully (\$119k) and Coastal Walkway Kurnabinna Gully (\$119k). These project budgets are on track.
			(\$217k)	Relates to the classification of budget between operating and capital for a number of projects which are individually insignificant.
			(\$16k)	Relates to a number of variances which are individually insignificant.
		(\$383k)	(\$733k)	
E	Materials Unfavourable (\$219k)		(\$219k)	Relates to a number of variances which are individually insignificant.
		\$000k	(\$219k)	
F	Finance Charges Favourable \$132k	\$132k		Lower than budget finance charges due to 2023-2024 loans being deferred.
		\$132k	\$000k	
G	Capital Expenditure - Renewal Favourable \$1,549k		\$416k	Reflects budget-timing with regards to Road reseal projects.
			\$281k	Relates to classification of budget between operating and capital for the Coastal Walkway Grey Gully (\$177k) and Coastal Walkway Kurnabinna Gully (\$104k). See above in Contractual Services.
			\$209k	Reflects budget timing with regards to Seacliff Golf Course Irrigation
			\$173k	Reflects budget-timing with regards to Boat Shed Carpark & Accessway.
			\$133k	Reflects budget-timing with regards to Footpath Renewal program.
			\$133k	Reflects budget-timing with regards to Stormwater works.
			\$204k	Relates to a number of variances which are individually insignificant.
		\$000k	\$1,549k	
H	Capital Expenditure - New Favourable \$2,471k		\$596k	Reflects budget timing with regards to Marino Hall Upgrade.
			\$447k	Reflects budget timing with regards to Footpath program.
			\$445k	Reflects budget timing with regards to Raglan Avenue Streetscape Upgrade.
			\$312k	Reflects budget timing with regards to Alawoona Avenue Reserve Development.
			\$257k	Reflects budget timing with regards to Golf Park Pipes to Tank.
			\$222k	Reflects budget timing with regards to Stormwater program.
			\$192k	Relates to a number of variances which are individually insignificant.
		\$000k	\$2,471k	
I	Funding Transactions Favourable \$2,355k	(\$139k)	\$2,139k	This variance is the sum total of all variances and reflects an increase against council's expected YTD cash position.

The above comments referring to budget timing variations are where some monthly budget estimates are not reflective of the actual expenditure patterns as at reporting date.

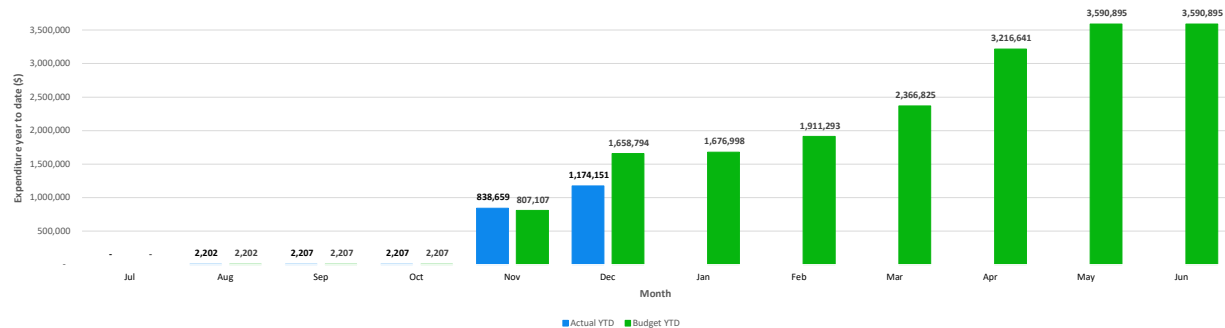
Funding Transactions

This variance is the sum total of all variances and reflects an increase against council's expected YTD cash position.

Road Reseal

Monthly Comment

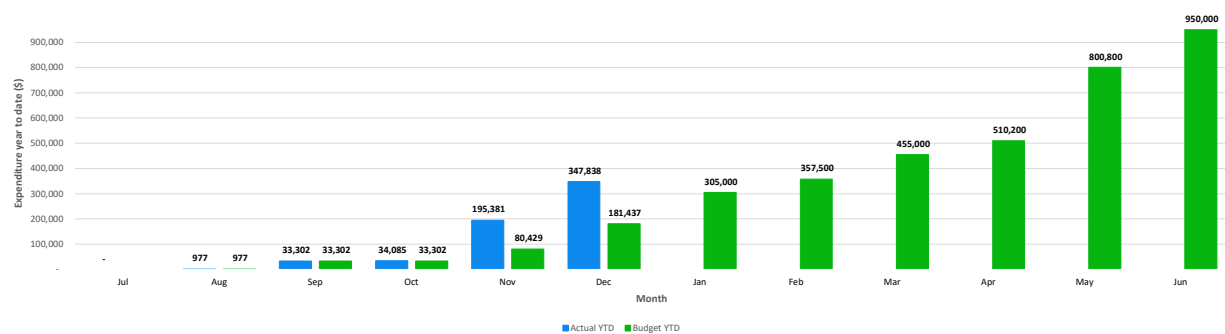
Program in progress with works 60% complete. Road Rejuvenation program (\$316k) to be carried over to 25/26 due to availability of contractors.



Kerb and Water Table

Monthly Comment

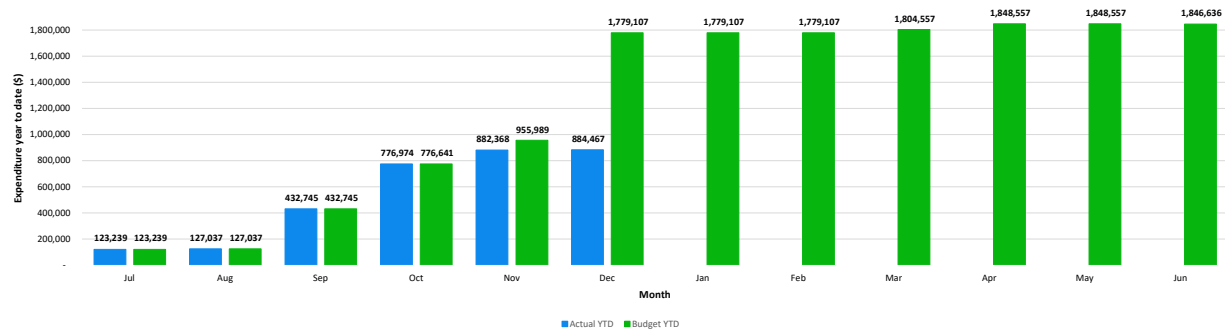
Program in progress with works 20% complete. Works at Johnstone Road, De Laine Avenue, Albany Crescent & Sampson Court are complete.



New Footpath Construction

Monthly Comment

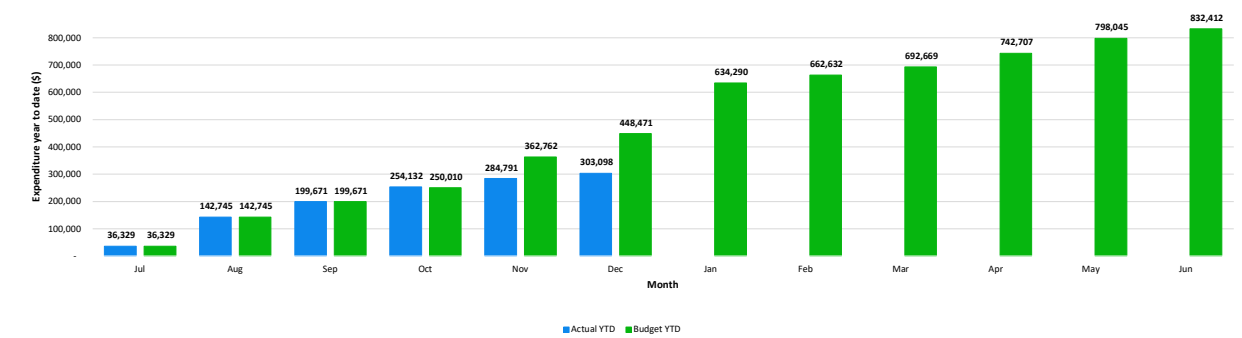
Program in progress with works 50% complete. Works on David Ave & The Cove Road retaining wall are complete.



Renewal Footpath Construction

Monthly Comment

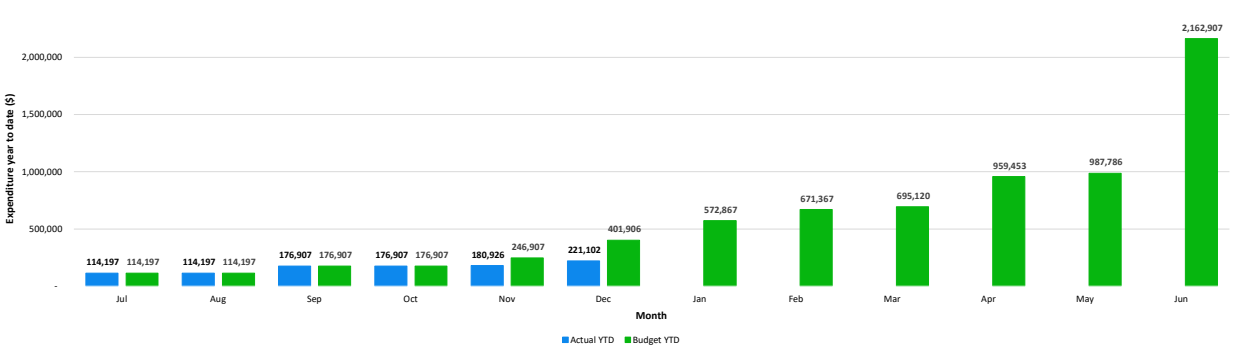
Program in progress with works 25% complete. Works on Thomas Street & Beadnall North/South have commenced.



Transport

Monthly Comment

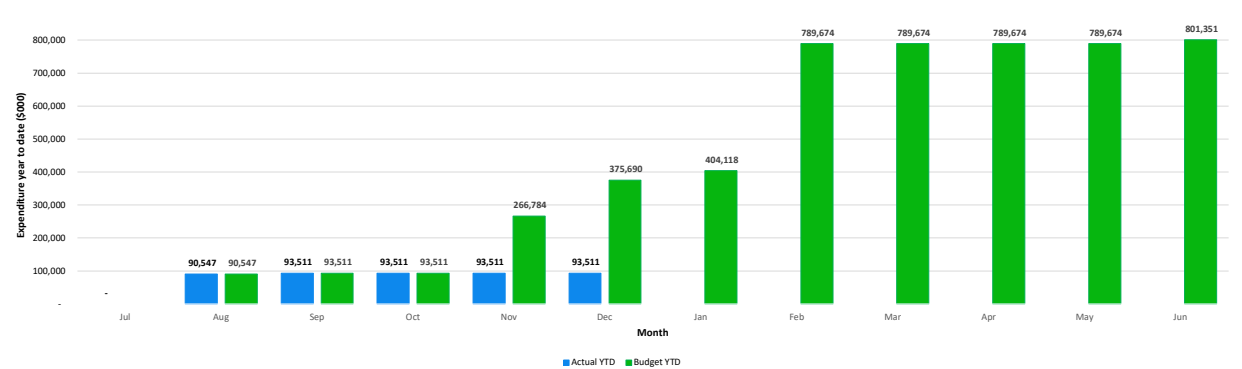
Program in progress with works on Koala Crossing - Our Lady Of Grace & Traffic devices in progress. Works on Jacobs Street Bridge are complete.



Car Parks

Monthly Comment

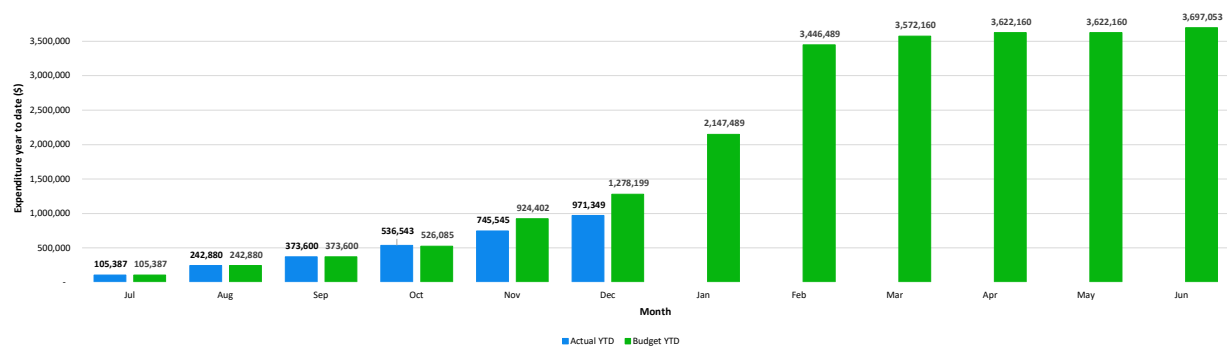
Program is in progress with Boat Shed car park & accessway and Alawoona Reserve car park complete. Preliminary works have commenced for Moreland Avenue car park.



Stormwater

Monthly Comment

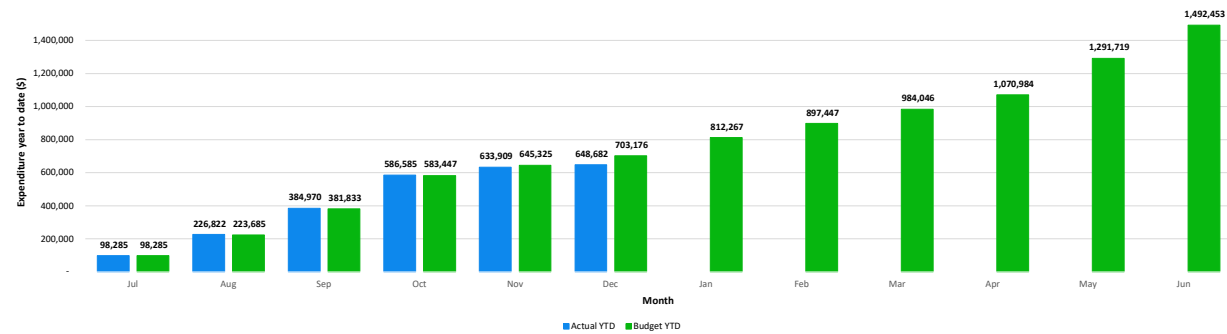
Program in progress with Ayre Street Side Entry Pit & Freebairn Drive complete. Works on Beadnall Terrace are in progress while planning works are commencing for the remaining projects in the program.



Street Trees

Monthly Comment

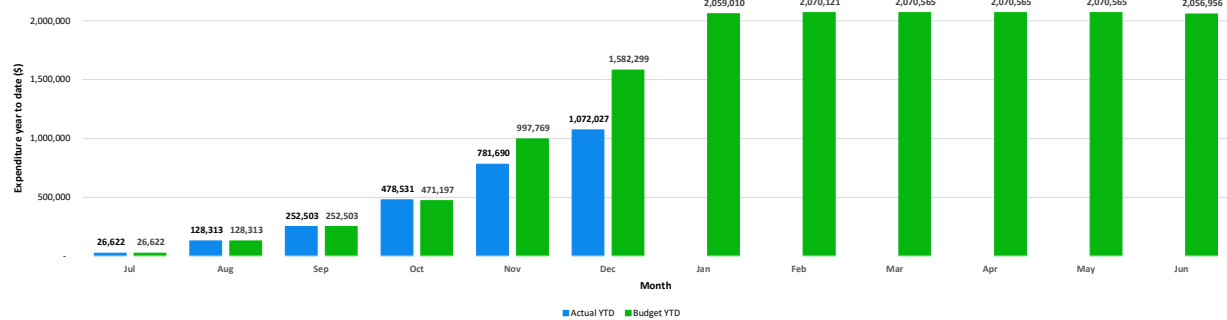
Program in progress with 2,700 street trees planted. This program is on track. Planting will recommence in May.



Streetscapes

Monthly Comment

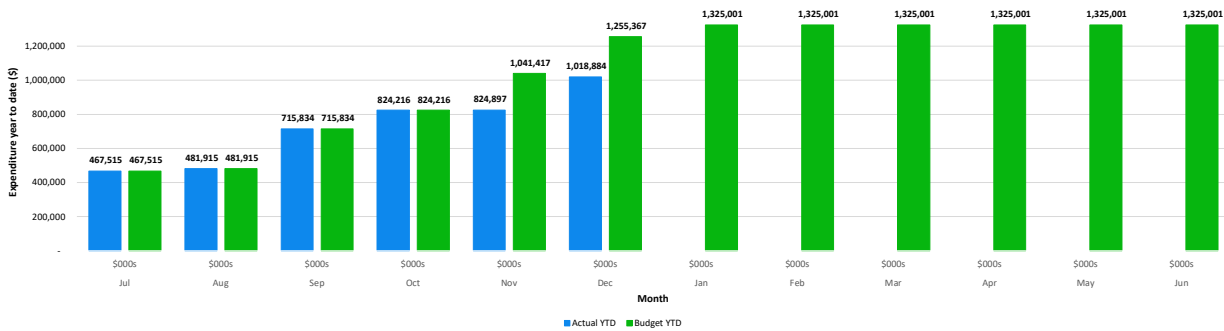
Program has commenced with works on Alawoona Avenue nearing completion. Works on Raglan Avenue are in progress.



Irrigation

Monthly Comment

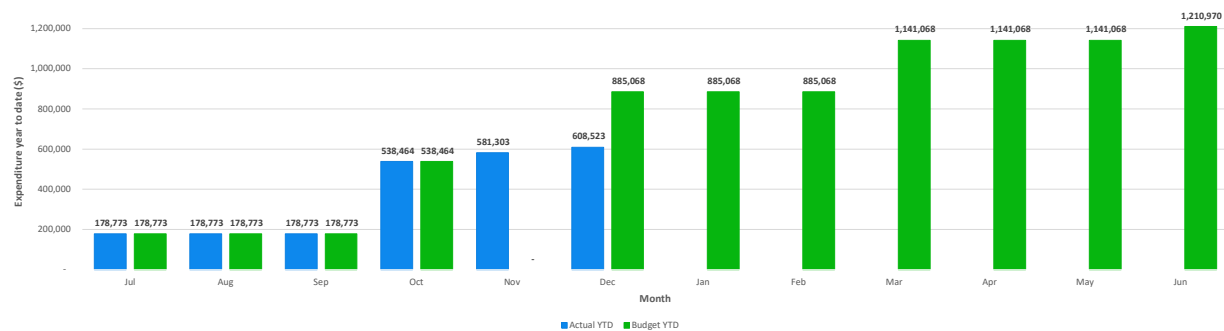
Program has commenced with works on Seaciff Golf Course 95% complete.



Wetlands

Monthly Comment

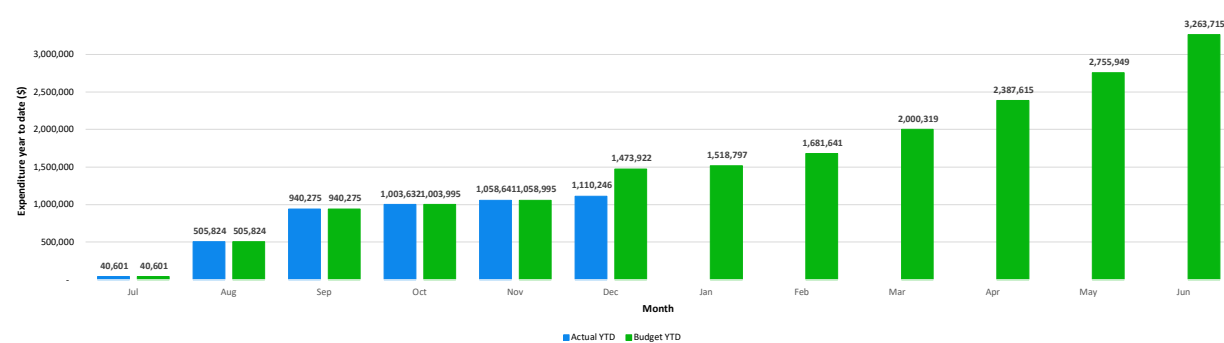
Program in progress with works 60% complete. Works on the Golf Park Pipes are nearing completion.



Open Space Developments

Monthly Comment

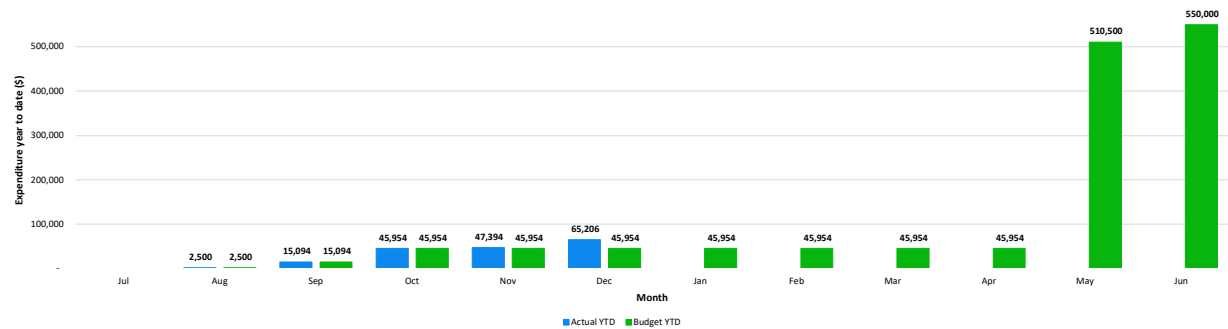
Program has commenced with works on Hessing Crescent, Cohen Court, Mema Court and Hamilton Park Reserves complete. A number of projects in this program are in the planning process while works on Graham Watts Reserve & Roy Lander Reserve are in progress.



Sports Facilities and Courts

Monthly Comment

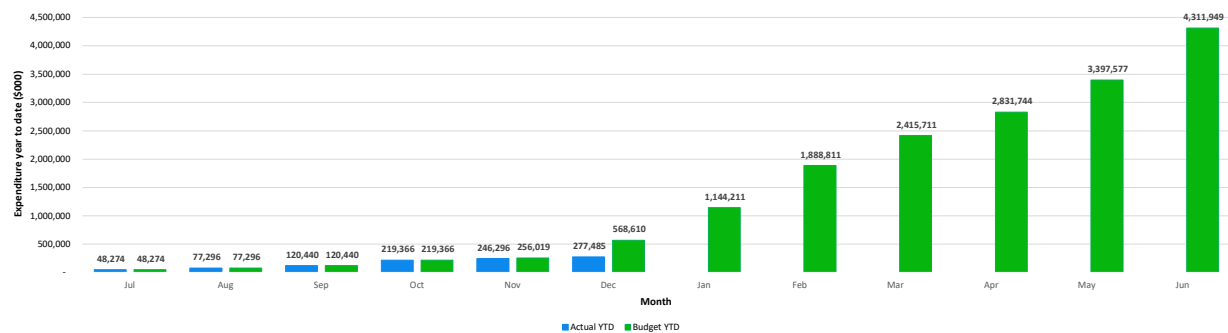
Designs for Hazelmere Reserve Court Lighting and Morphettville Park Tennis Clubrooms are being reviewed. Tenders for the Southern Soccer 4th Pitch are being reviewed.



Building Upgrades

Monthly Comment

Program has commenced with works on Building Security Systems (Admin and Cove Civic Centre) complete. Works on Morphettville Sports Cricket Pitch, Edwardstown Rotary Book Club Roofing & MCC Theater Seating are also complete. Tenders are being assessed for EV Stations at Admin and City Services. A number of other projects in this program are in the preliminary stages.



Marino Hall Upgrade

	2024-25	2024-25	Project
	Actual	Budget	Cost At
	YTD		Completion
Income			
State Government Grant Contribution			500,000
Commonwealth Government Grant Contribution		600,000	3,000,000
Total Income	-	600,000	3,500,000
Expenditure			
Operating	-	-	-
Capital Construction	(2,743,214)	(5,771,970)	(7,884,517)
Total Expenditure	(2,743,214)	(5,771,970)	(7,884,517)
Project Result Surplus/(Deficit)	(2,743,214)	(5,171,970)	(4,384,517)

The remaining \$4.385M of project funding required will be funded by Council.

Council have received the State Governments contribution to this project and \$2.400M of the Commonwealth contribution

Cove Sports netball and Lower Oval Upgrade

	2024-25	2024-25	Project
	Actual	Budget	Cost At
	YTD		Completion
Income			
State Government Grant Contribution			2,500,000
Total Income	-	-	2,500,000
Expenditure			
Operating	-	-	-
Capital Construction	(273,759)	(1,255,308)	(7,220,000)
Total Expenditure	(273,759)	(1,255,308)	(7,220,000)
Project Result Surplus/(Deficit)	(273,759)	(1,255,308)	(4,720,000)

The remaining \$4.720M of project funding required will be funded by Council.

Council have received the State Governments contribution to this project.

Sundry Debtors Report - Ageing report as at 31 December 2024

Appendix 3

Debtor	Total Balance	Current	30 Days	60 Days	90 Days	90+ Days	Percentage of total 90+ day balance	Comments for 90+ Day balances
General Total	50,773.44	36,220.89	3,865.60	.00	.00	10,686.95	12%	Made up of 3 out of 18 debtors. One account totalling \$6,605.00 is being worked through with the debt collector.
Neighbourhood Centres Total	1,845.00	.00	.00	.00	.00	1,845.00	2%	Made up of 4 debtors. One account totalling \$1,359.00 is on a payment plan. One account totalling \$33.00 has subsequently been settled in January.
Regulatory Services Land Clearing Total	3,546.61	.00	.00	.00	1,870.00	1,676.61	2%	Made up of 3 out of 4 debtors. These accounts are in the process of being transferred to rates accounts.
City Property - Leased Facilities Total	389,626.91	304,689.42	18,111.88	16,756.64	.00	50,068.97	57%	Made up of 2 out of 27 debtors. Both of these accounts are on payment plans, payments of \$4,668.85 have subsequently been received.
City Property - Sporting Facilities Total	16,234.63	16,234.63	.00	.00	.00	.00	0%	
Civil Services Private Works Total	28,518.79	13,162.50	2,200.00	1,058.80	.00	12,097.49	14%	Made up of 9 out of 17 debtors. Eight accounts totalling \$11,397.00 are on payment plans, payments of \$525.00 have subsequently been received. One account totalling \$700.00 is being worked through with the debt collector.
Swim Centre Debtors Total	130,112.18	130,112.18	.00	.00	.00	.00	0%	
Grants & Subsidies Total	106,552.40	84,552.40	.00	22,000.00	.00	.00	0%	
Environmental Health Inspections Total	19,777.20	6,018.00	2,880.00	.00	.00	10,879.20	12%	Made up of 62 out of 111 debtors, with none individually significant.
Marion Cultural Centre Total	1,451.60	1,187.60	182.00	82.00	.00	.00	0%	
Local Government Total	209,415.23	122,555.19	65,791.26	9,436.83	11,631.95	.00	0%	
Total	957,853.99	714,732.81	93,030.74	49,334.27	13,501.95	87,254.22		
Total Aging Profile		75%	10%	5%	1%	9%		

Category	Description
Employees	Anything that relates to CoM employees.
General	Anything that does not fit into one of the below categories.
Neighbourhood Centres	For hire of rooms in Neighbourhood Centres, etc. - usually charged out at an hourly rate. Also includes cultural workshops and tours.
Regulatory Services Land Clearing	When council has had to clear land due to non-compliance of owner.
Sporting Clubs & Other Leases	Rent, electricity, water, maintenance, etc. charged out to lessees.
Civil Services Private Works	Repairs or modifications to infrastructure (footpaths, kerbs, driveway inverts). Can be at resident request.
Swim Centre Debtors	Outdoor Swimming Centre - used for lane hire, school visits, etc.
Grants & Subsidies	Government grants and subsidies.
Environmental Health Inspections	Food inspection fees.
Regulatory Services Other	Vehicle impoundment fees and other regulatory services.
Supplier Refunds	Where a supplier owes the City of Marion funds. This category is used to keep track to ensure we have received payment for credits.
Development Services	Includes contribution from residents and/or developers for the removal and/or replacement of Council Street Trees and significant trees.
Living Kaurna Cultural Centre	Relates to programs run through the LKCC.
Environmental Health Testing	Environmental testing fees.
Local Government	Transactions with other Local Government corporations.
Communications	Anything related to communications.
Economic Development	Events, etc. relating to economic development within the City of Marion.
Marion Cultural Centre	Hiring of the Marion Cultural Centre.

*any category that does not have any outstanding invoices will not be displayed.

Rates Report - Collection of Rates to 31 December 2024

ANALYSIS OF OUTSTANDING RATES AS AT 31 DECEMBER 2024

	<u>Note</u>		% of Total Annual Rates
CURRENT	1	\$ 40,911,461	43.2%
OVERDUE	2	\$ 645,396	0.7%
ARREARS	3	\$ 2,061,146	2.2%
INTEREST	4	\$ 194,319	0.2%
POSTPONED	5	\$ 288,673	0.3%
LEGALS	6	\$ 16,174	0.0%
		\$ 44,117,169	46.5%
TOTAL ANNUAL RATES FOR 2024/25		\$ 94,809,117	

Note 1: Current

Current rates represent the total amount of rates levied in the current financial year that are not yet due for payment. For example at 1st January this represents Quarter 3 & Quarter 4 rates unpaid.

Note 2: Overdue

Overdue rates represent rates levied in the current financial year that remain unpaid past their due payment date. For example on 1st January, this represents rates from Quarter 1 and Quarter 2 that remain unpaid.

Note 3: Arrears

Rates in arrears represent rates and charges levied in previous financial years that remain unpaid .

Note 4: Interest

Interest represent the fines and interest applied to overdue rates and rates in arrears.

Note 5: Postponed

Postponed rates represent any rates amount due by seniors that have been granted a deferral, until the eventual sale of their property, as allowable under the Local Government Act. Interest is charged on these deferred rates and is recoverable when the property is sold.

Note 6: Legals

Legals represent any legal fees, court costs that have been incurred by Council in the collection of rates in the current financial year. These amounts represent costs that have been on-charged to the defaulting ratepayers and are currently outstanding.

14 Workshop / Presentation Items - Nil**15 Motions With Notice****16 Questions With Notice****17 Motions Without Notice****18 Questions Without Notice****19 Other Business****20 Meeting Closure**

Council shall conclude on or before 9.30pm unless there is a specific motion adopted at the meeting to continue beyond that time.