

30 July 2025

Circular Economy team
Green Industries SA
PO Box 1047
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Via email: GISA.WasteStrategy@sa.gov.au

Dear Circular Economy team

Re: Accelerating SA's transition to a circular economy: South Australia's Waste Strategy 2025-2030

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide feedback on South Australia's Draft Waste Strategy 2025–2030. We commend Green Industries SA (GISA) for the progress achieved under the 2020–2025 Waste Strategy, and for its continued leadership in advancing South Australia's transition to a circular economy. The 2025–2030 Strategy (the Strategy) presents a strong and timely foundation for accelerating progress toward a more sustainable and circular future. We particularly welcome the recognition of the built environment as both a significant contributor to waste and a key area of opportunity for circular innovation, resource recovery, and long-term impact.

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings – including social infrastructure – fitouts and communities. Green Star aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities
- supporting and rewarding the development and use of sustainable products and materials
- contributing to market transformation and a sustainable economy.

GBCA's submission provides feedback across all strategic objectives, targets, and focus areas. Key recommendations include:

- Strengthening circular language (e.g., using “end-of-use” instead of “end-of-life”)
- Emphasising the importance of designing out waste at the outset
- Ensuring recycled content is also recyclable
- Greater support of tools such as material passports, digital material banks, and product identifiers to enable traceability and reuse.

The built environment represents a significant opportunity to lead in circular outcomes, and we recommend:

- Increased government leadership through procurement
- Inclusion of fitout waste
- Incentivising deconstruction
- Embedding circularity into briefs and contracts
- Creating job opportunities for those with circular skills
- Ensuring open, accessible data sharing across supply chains.

GBCA provides comment in response to the following requests for information in the waste strategy:

Commentary on strategy objectives

A circular economy not only maximises existing resources but reduces the extraction of new ones. We support the strategy's intent to “use our natural resources more effectively”, though encourage a stronger ambition that reflects the need to phase out the use of virgin natural resources altogether, where possible. Additionally, there is an opportunity to include the objective to support the transition away from linear business models to more circular ones, recognising the growing demand for repair and reuse businesses, and the opportunity this presents for jobs and innovation.

Commentary on goals

Across the goals and throughout the Strategy, there are consistent references to “recycled content” and “end-of-life” terminology. We recommend that where the use of recycled content is encouraged, equal emphasis be placed on the *recyclability* of the product. Without this consideration, there is a risk of promoting materials that, while made from recycled inputs, have limited potential for future recovery or reuse — ultimately undermining circular outcomes.

Additionally, we suggest reconsidering the use of the term “end-of-life,” which implies a linear approach to materials management. Terms such as “end-of-use” or “subsequent use” better reflect the principles of a circular economy, where materials are kept in circulation for as long as possible through reuse, remanufacture, and repurposing.

Commentary on targets

Target	GBCA commentary
Target 1: 10% reduction in material footprint by 2035	The current metric excludes materials used locally to manufacture exports, which may obscure South Australia's true material impact. Including this in calculations would provide a more accurate baseline.
Target 2: 30% increase in material productivity by 2035	We support the concept of “valorising waste”, but recommend reframing this through the lens of residuals, rather than waste. In a circular economy, nothing is wasted – materials are simply redistributed.

Target 3: 10% reduction in total waste generated per person by 2030	Reducing waste must focus on reducing overall consumption, not just increasing recycling. More recycling can increase demand on infrastructure unless paired with material reduction.
Target 4: Increase resource recovery and reduce contamination	We support the acknowledgement that legacy and problematic materials will continue to impact recovery rates. Transitioning away from these materials must be a priority.
Target 5: 50% reduction in organics to landfill	No comment – not within GBCA’s scope.
Target 6: Maximise material circularity	We support the intent of target 6, which focuses on maximising material circularity across South Australia’s economy. GBCA has no further comments to add.
Target 7: Increase circular consumption activities	This target is critical to driving behavioural and business change. We strongly recommend that government procurement lead by example, by requiring circular products and services across public projects.

Commentary on focus areas

Focus area 1: Avoid waste

GBCA supports the strong emphasis on waste avoidance as the highest priority in the waste hierarchy. However, consumer demand for more sustainable products does not currently align with the products available on the market. Businesses must shift away from a narrow focus on maximising short-term profit and instead consider long-term lifecycle outcomes. GBCA encourages GISA to support businesses that are providing innovative circular solutions to the market.

In the context of waste avoidance within the built environment, there is a clear opportunity to shift away from the traditional capital expenditure (CapEx) versus operational expenditure (OpEx). Instead, evaluating value across the full lifecycle of an asset — from design and construction through to use, maintenance, and end-of-use — enables more sustainable, cost-effective outcomes. Government procurement can play a pivotal role in this transition by prioritising circular products and materials in public projects. To support this, we encourage explicit reference to the [A Practical Guide to Circular Procurement: For new buildings and major refurbishments](#), developed by the GBCA in collaboration with GISA, which outlines actionable strategies for embedding circularity into procurement processes.

In terms of action partners, we recommend including the Green Building Council of Australia and product certification initiatives.

Focus area 2: Reduce food waste

GBCA has no comments on this focus area, as it falls outside the scope of the built environment.

Focus area 3: Reduce material loss and preserve value

The construction and demolition (C&D) sector presents a significant opportunity to enhance material recovery and preserve embedded value. GBCA strongly encourages the integration of material banks, which digitally log building components to enable future reuse at end-of-use. These systems should be implemented not only during deconstruction but also during new construction and refurbishment to maximise material traceability and circularity across building lifespans. Additionally, policy reform should be explored to mandate building deconstruction over demolition, where feasible, to improve material recovery outcomes.

GBCA recommends being listed as an action partner under action 3.22 given our ongoing work in this space. We note our recently released report, [Australia’s Waste\[d\] Opportunity 2025](#). This paper aims to help establish more accurate and meaningful benchmarks for construction waste. A key insight derived from the analysis of Green Star projects was that many projects report high recycling rates without clarity on the actual fate of materials — i.e., what is merely sent for recycling versus what is successfully recycled. The

paper advocates for a shift from simply reporting diversion rates to reducing total waste generation. It emphasises the need to understand and minimise materials that are not retained at high value — including those ending up in landfill, low-grade recycling, or waste-to-energy.

Focus area 4: Address emerging and problematic wastes

We support the inclusion of problematic waste as a priority and encourage the addition of a specific consideration for construction and demolition materials that pose unique challenges. These include products with chemicals of concern, hazardous materials, and packaging that limits recyclability. Addressing these materials at both the design and procurement phases will be critical to avoiding legacy waste in future built environment projects.

GBCA recommends reviewing the [Responsible Products Guidelines – Version A](#), which contains requirements for building products and materials regarding chemicals of concern and packaging. GBCA are drafting the next version of these guidelines which will contain updated requirements for these criteria. We encourage GISA to review the proposed credits when they are out for consultation in September 2025.

Focus area 5: Develop and support circular markets and businesses

GBCA appreciates the strategy's acknowledgement of the important role that government procurement plays in transitioning to a circular economy. GBCA supports the inclusion of incentives to assist businesses transitioning to more circular business models. These could include tax relief, grants, or technical support, especially for SMEs that face upfront barriers to transformation.

Focus area 6: Build a circular built environment

We support the inclusion of a dedicated focus area for the built environment. GBCA encourages the Strategy to reference and incorporate circular strategies and tools from the *A practical guide to circular procurement*, including buildings as material banks, digital material tracking, and the importance of embedding circularity into procurement briefs and contractual requirements. These mechanisms enable circular principles to be operationalised from the outset of building projects. There is also a need to support manufacturing skills and capacity in South Australia to meet demand for circular products — particularly those that can be maintained, repaired, and recovered across multiple uses.

The inclusion of such considerations in action 6.3, with specific reference to circular products, materials, and services, would further strengthen this focus area.

We acknowledge the inclusion of content from [Circular economy in South Australia's built environment: Action plan](#), in the Strategy — a project that GBCA was proud to deliver for the South Australian Government. This document provides recommended actions for government, industry, and the education and training sector that will not only support the objectives of Focus area 6, but the other focus areas, too.

Focus area 7: Develop circular economy knowledge and skills

We support the actions identified under this focus area and agree that the transition to a circular economy will require a broad spectrum of new skills — from circular business model design to material tracking, data analytics, repair, and maintenance. Beyond skill development, GBCA encourages the Strategy to also address the creation of practical opportunities for these skills to be applied in real-world contexts. Facilitating partnerships between industry, government, and education providers will be critical to ensuring circular competencies are developed and embedded into business-as-usual practices across sectors, including construction, design, and product stewardship.

Focus area 8: Measure SA's transition to a circular economy

Measurement and data transparency are foundational to circular economy progress. While GBCA supports data collection, we also emphasise the importance of data sharing. Infrastructure and funding are needed to enable businesses — particularly smaller enterprises — to both contribute to and access data in a secure, usable, and affordable way. In the product and materials space, GBCA is actively advocating for the use of unique product identifiers that can trace a product's lifecycle from material extraction through to

reuse and end-of-use. These identifiers can also capture information on composition, repair protocols, maintenance schedules, and stewardship pathways, enabling more informed and sustainable decision-making throughout supply chains.

Focus area 9: Contribute to net zero emissions

GBCA supports the strong alignment between circular economy principles and South Australia's net zero emissions objectives. Circularity plays a critical role in reducing embodied carbon, minimising material demand, and extending the lifespan of assets—particularly in the built environment. These outcomes are essential to achieving long-term decarbonisation goals.

We recommend strengthening action 9.3 by including the GBCA and NABERS as key action partners. Both organisations have established tools and frameworks that are already driving emissions reductions in the built environment. These systems can support both government and industry in embedding circularity within net zero pathways.

GBCA also recommends referring to [A Practical Guide to Upfront Carbon Reductions](#), which provides actionable strategies for lowering embodied carbon during design and construction, including through material reuse and circular procurement. In addition, NABERS' ongoing work on embodied carbon, including the development of the [National material emission factors database](#), offers valuable guidance for consistent and transparent measurement of embodied carbon in buildings.

As GISA moves toward implementing the actions outlined in the Strategy, GBCA would welcome the opportunity to contribute to the development of practical solutions, particularly those relating to the built environment and circular procurement.

To arrange further discussion, or for additional clarification of the points made above, please do not hesitate to contact Harriet Smith, Manager for Products and Materials, via email at harriet.smith@gbca.org.au.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'D. Rooney'.

Davina Rooney
Chief Executive
Green Building Council of Australia