

Feedback on the Proposed FOGO Service and the Waste Management Strategy 2021–2031

South Tomaree Community Association (STCA)

Submitted to: Port Stephens Council

Subject: Waste Services Survey – Future Household Waste Collection Services, and feedback on the Waste Management Strategy 2021–2031

Date: July 2026 (Amended and Expanded Submission)

Purpose and Scope of This Submission

This submission responds to Port Stephens Council's current community survey on future household waste collection services, including the proposed introduction of a Food Organics and Garden Organics (FOGO) service and a possible change to general waste (red-lid bin) collection frequency.

It also provides feedback on the Waste Management Strategy 2021–2031 (“the Strategy”) more broadly, as the adopted document that establishes Council's waste diversion targets, performance baseline and implementation program, and which underpins the current proposal. Where relevant, this submission draws directly on data and commitments published in the Strategy to test the current proposal against Council's own evidence base. STCA offers this submission as input both to the immediate FOGO and collection-frequency decision, and to any future review or update of the Strategy.

This amended and expanded submission also incorporates a further set of clarifying questions raised by STCA members and the broader community following initial review of the Strategy and the FOGO proposal. These additional questions span Council's long-term waste disposal and processing infrastructure position, regional collaboration and alternative technology options, the commercial, industrial and construction and demolition (C&I/C&D) waste streams, kerbside recycling performance and community confidence, and the detailed operation of the proposed FOGO service. They are addressed throughout this submission and are summarised in the Key Requests at a Glance below.

Executive Summary

Bottom line: Council's own published data supports introducing FOGO now. It does not yet support halving general waste collection at the same time.

The fundamental purpose of local government waste services is to protect public health and environmental health through the regular collection, transport and lawful disposal of waste. Effective waste management minimises the risk of vermin, insects, odours, pollution and disease transmission, while maintaining community amenity, supporting resident wellbeing and ensuring a clean, safe and healthy living environment. While contemporary waste management rightly places significant emphasis on avoidance, recycling and resource recovery, these objectives are secondary to this core public health function.

The South Tomaree Community Association (STCA) supports the environmental objectives underlying the proposed FOGO service and acknowledges that Council is required to implement a FOGO service in response to NSW Government policy and legislative requirements. However, Council's own published data – not merely community sentiment – raises significant questions about whether a parallel reduction in general waste collection frequency is currently justified. In particular:

- Council's 2019/20 overall diversion rate was 56% against a 2022 state target of 75%, and its commercial and industrial (C&I) waste stream – at 24% diversion against a 70% target – is performing far worse than the household (municipal) waste stream, at 44% against the same target.
- Almost half (46.9%) of the material already found in the average red-lidded general waste bin is garden and food organics – precisely the material a FOGO service is designed to capture.
- In Council's own 2020/21 community telephone survey, 92% of residents said the current weekly red-bin collection frequency was appropriate – yet 40% also reported that their bin was already full or overflowing at the time of that weekly collection.
- The Strategy's own Implementation Plan treats introduction of a third kerbside bin as a feasibility-dependent, medium-term (3–5 year) action, not a fixed near-term commitment.

- Council has not yet publicly confirmed its long-term position on waste disposal and processing infrastructure – including the future of the Summer Hill Waste Management Centre and whether alternative technologies such as waste-to-energy are being investigated, either alone or with regional partners.

Read together, this evidence suggests FOGO alone is likely to capture the great majority of the readily achievable kerbside diversion opportunity – and that the community has not yet been shown evidence, or even directly asked, to support halving general waste collection on top of it. Full analysis and sourcing for each of these points is set out in Section A below.

STCA supports measures that:

- Reduce waste sent to landfill;
- Improve resource recovery;
- Reduce greenhouse gas emissions;
- Promote circular economy outcomes; and
- Help Council meet state waste diversion targets.

However, STCA does not believe sufficient evidence has yet been presented to justify reducing general waste collections from weekly to fortnightly. Nor has Council yet specified how FOGO material will be processed, or what governance and assurance arrangements will apply to monitor the performance of any new service model. These matters, together with the further questions raised on Council's broader waste infrastructure, commercial and industrial performance, and kerbside recycling confidence, are addressed in turn below.

STCA's position is therefore: Introduce FOGO, retain weekly red-bin collections until sufficient current, local evidence is available, and undertake a comprehensive, published review – against clear KPIs and governance arrangements – before any future reduction in red-bin collection frequency is considered.

Suggestions at a Glance

For ease of reference, STCA's suggestions are summarised here. Full detail and supporting evidence for each is provided in the sections that follow.

- Introduce FOGO now; retain weekly red-bin collection at commencement.
- Publish updated (post-2019/20) waste generation, diversion and kerbside composition data before any decision on collection frequency.
- Publish a FOGO Implementation and Processing Plan covering technology, contamination, odour/vector control and contracted capacity.
- Address the larger commercial and industrial (24% vs 70% target) diversion gap ahead of any change to household service levels.
- Adopt published KPIs, review triggers, an exemptions process and a formal 12–24 month review before any move to fortnightly collection.

These five items are the preconditions STCA considers necessary before any change to red-bin collection frequency. STCA's further questions and requests – on illegal dumping and vulnerable household support, long-term landfill and processing infrastructure, benchmark costs, the waste levy, behaviour-change strategy, Development Approval conditions, and kerbside audit data and recycling confidence – are important to the broader Strategy and are addressed in full in the sections and Recommendations below, but are not preconditions for proceeding with FOGO itself.

A. Context: This Submission and the Waste Management Strategy 2021–2031

Before addressing the specific FOGO and collection-frequency proposal, STCA has reviewed the Strategy itself, as the document that sets Council's targets and is presumably informing the current proposal. This context is directly relevant to whether the proposed changes are proportionate and well-evidenced.

A.1 Where Council's Own Data Shows the Real Gaps Lie

The Strategy reports Council's performance against the NSW EPA's Waste Avoidance and Resource Recovery (WARR) Strategy diversion targets as follows:

Waste Type	2022 Target	2019/20 Actual	Gap to Target
Municipal Solid Waste (MSW)	70%	44%	-26 points
Commercial & Industrial (C&I)	70%	24%	-46 points
Construction & Demolition (C&D)	80%	100%	+20 points (exceeded)
Overall Diversion from Landfill	75%	56%	-19 points

(*Waste Management Strategy 2021–2031, Table 5 – WARR Waste Diversion Targets, p.12*)

These figures show that the largest performance gap by far is in commercial and industrial waste – 20 percentage points worse than the household (municipal) shortfall. Construction and demolition waste, by contrast, already exceeds its target – at least according to this data. Reducing red-bin collection frequency addresses only part of the smaller of the two under-performing streams, while placing the practical cost and inconvenience of adjustment squarely on households (see Section E).

The Strategy also notes that Council's 2019/20 kerbside diversion rate of 41% was “significantly impacted” by the NSW EPA's ban on the application of mixed waste organic output (MWOO) to land, and that without this ban the kerbside diversion rate would have been 60%. (*Waste Management Strategy 2021–2031, p.11*)

A.2 The Strategy's Evidence Base Is Now Dated

The waste generation, diversion and composition data underpinning the Strategy is drawn from the 2019/20 financial year – now over six years old, and pre-dating the current proposal by more than half a decade. The kerbside composition audits referenced in the Strategy were undertaken in 2011, 2013, 2016, 2018 and 2020, meaning the most recent published composition data is also from 2020. (*Waste Management Strategy 2021–2031, p.13*)

Local Government Area population, tourism activity, household composition, and the volume and composition of the average general waste bin may all have changed materially since then – including as a result of the subsequent lifting of the MWOO ban, cost-of-living pressures, and post-pandemic changes in household consumption and waste generation. STCA recommends Council publish updated waste generation, kerbside diversion and composition data, including a current kerbside audit, before finalising any change to collection frequency, so that decisions are based on current conditions rather than 2019/20 conditions.

A.3 The Adopted Implementation Plan Treated the Third Bin as a Feasibility-Dependent, Medium-Term Action

The Strategy's Implementation Plan lists “introduction of third kerbside bin” as a medium-term (3–5 year) action, conditional on feasibility, sitting alongside a separate short-term action to first “investigate the feasibility of implementing a third kerbside bin for the source separation and collection of garden organics (GO) or Food Organics Garden Organics (FOGO), including processing technology options.” (*Waste Management Strategy 2021–2031, Implementation Plan, p.20*)

STCA supports Council progressing this work. However, the pace and manner in which the current proposal appears to be advancing – including a possible simultaneous change to red-bin frequency – goes beyond what the adopted Strategy itself contemplated at this stage of the program. This reinforces STCA's view that a robust, current and published evidence base should accompany any decision to accelerate that timeline.

A.4 Long-Term Disposal and Processing Infrastructure, and Regional Collaboration

The Strategy identifies ‘Regional Collaboration Opportunities’ as a preferred waste management option, committing Council to “continue to work collaboratively with neighbouring councils and other stakeholders on regional and circular economy opportunities” (*Waste Management Strategy 2021–2031, p.17 and p.20*). It also commits Council to prepare a Master Plan for the Salamander Bay Waste Transfer Station (p.20). However, the Strategy does not address Council's longer-term landfill and processing capacity position, and STCA members have raised a number of related questions that remain unanswered in material published to date, including:

Site, technology and regional search:

- Is Council committed to continued use of the Summer Hill Waste Management Centre indefinitely, or is an alternative site or arrangement being planned?
- Is Council considering, either alone or collectively with regional partners, alternative landfill sites or alternative processing technologies, such as waste-to-energy?
- Is a search for alternative energy or processing solutions currently underway, and if so, by whom?

- Which parties – neighbouring councils, state agencies, or private operators – would be involved in any broader regional solution or search, and what is the current status of that engagement?

Costs and process:

- Is there a benchmark processing cost that Council uses to compare options?
- Is there a benchmark additional transport/mileage cost associated with hauling waste to alternative facilities?
- Considering that economies of scale are likely to be critical to any regional solution, what process of collaboration with regional partners is currently being undertaken?
- If an alternative technology is identified as part of the answer, what process would Council follow to investigate and prove its technical and financial viability before committing to it?

Targets and benchmarking:

- Is the NSW EPA's 70% MSW diversion target still considered relevant, feasible and achievable for Port Stephens? If not, what target does Council consider realistic, and on what basis?
- Based on lived experience across other NSW councils, what does 'best in class' waste management performance actually look like, and how does Council's current and proposed performance compare?

STCA considers this information directly relevant to the FOGO and collection-frequency decision, because the cost, capacity and environmental case for any change to household services cannot be properly assessed without understanding Council's broader, longer-term disposal and processing strategy. STCA recommends Council publish a short position statement addressing these questions, cross-referenced to the Master Plan and Regional Collaboration commitments already in the Strategy's Implementation Plan.

B. FOGO Is Supported In Principle

STCA recognises that food and garden waste constitutes a significant component of landfill, and that diverting organics into a dedicated FOGO stream will improve environmental outcomes. This is reinforced by Council's own kerbside composition audit, which found that food/kitchen waste (21.8%) and garden/vegetation waste (25.1%) together make up 46.9% of the average red-lidded general waste bin – by far the largest single category of material currently going to landfill via general waste. (*Waste Management Strategy 2021–2031, Kerbside Composition, p.12*)

Potential benefits of FOGO include:

- Reduced landfill volumes;
- Reduced methane emissions;
- Increased production of compost and beneficial soil products;
- Improved recovery of organic materials;
- Potential use of lower cost non-putrescible landfill facilities for the remaining GSW stream; and
- Progress toward NSW waste diversion targets.

The proposed weekly FOGO service appears consistent with contemporary waste management practice and should assist Council in achieving the objectives identified within the Strategy. The key issue before the community is therefore not whether FOGO should be introduced, but how it will be delivered, and whether the red-lid general waste collection should remain weekly or be reduced to fortnightly collection frequency.

C. FOGO Processing, Collection, Contamination and Regional Delivery

C.1 System-Level Information Not Yet Publicly Available

No information has yet been made publicly available confirming how FOGO material will actually be managed once collected. STCA considers this to be a significant gap that should be addressed before any change to red-bin service levels is confirmed. Before residents can properly assess the proposal, Council should publicly confirm:

- Whether FOGO material will be processed at a Council-owned facility or by a third-party contractor, and where that facility is located;

- The processing method to be used (e.g. windrow composting, in-vessel composting, anaerobic digestion) and its proven capacity to handle Council's expected volumes;
- Whether a processing contract or agreement has been secured, and if so, its term and capacity limits, including during peak tourist season;
- Contamination acceptance criteria and the consequences of contaminated loads, including whether rejected loads would be landfilled and how any additional costs would be funded or passed on;
- Odour, vector (vermin, flies) and amenity management measures at the kerbside and at the processing facility, given Port Stephens' warm coastal climate;
- The specification, size and provision arrangements for FOGO bins and kitchen caddies, including compostable liner supply;
- Collection frequency, vehicle and route logistics, and how these interact with any change to red-bin frequency;
- The intended end market(s) for finished compost or soil products;
- Transitional arrangements for the roll-out period, including how residents will be supported to adapt.

(Waste Management Strategy 2021–2031, Regional Collaboration Opportunity, p.17; Small Acts Big Change, p.9)

STCA recommends that Council publish a FOGO Implementation, Education and Processing Plan addressing the matters above prior to any decision on red-bin collection frequency. Without this information, the community is being asked to support a change in service without visibility of how the replacement system would actually function.

C.2 Scope, Contamination Tolerance and Behaviour Change

In addition to the system-level questions above, STCA has received a number of more specific, practical questions from residents about how the FOGO service will actually operate day to day. Before rollout, Council should clarify the following.

Scope of accepted material

- Will all food waste be accepted, and if not, what specific exclusions will apply?
- Will pre-packaged food waste (i.e. food still in its original packaging) be accepted, and if so, how should residents prepare it?
- How will contamination from food waste presented in ordinary (non-compostable) plastic bags be managed, and what is the maximum contamination tolerance the processor is able to accept before a load is rejected?

The following materials are commonly assumed by residents to be compostable but are frequently not accepted by FOGO processors, and STCA requests Council confirm the status of each locally:

- Coffee pods
- Tea bags
- Bioplastics
- Biodegradable cups, plates and cutlery
- Coffee cups
- Bones
- Various paper and cardboard products (e.g. HWS, glossy or heavily printed stock)

Design and delivery model

- STCA notes that FOGO services are most successful, and achieve the lowest contamination rates, where households can opt in rather than being defaulted into the service. Council should confirm whether an opt-in model has been considered, and if not, why a mandatory model has been preferred.
- What composting process will be used, and does it have proven capacity to handle Council's expected volumes and contamination profile?
- Are end markets for the finished compost or soil product secure, and is there an ongoing need and value for that output material?

- What is the emergency or contingency plan should any element of the collection, transport, processing or end-market chain fail or become unavailable?

STCA requests that this operational detail be included in the FOGO Implementation and Processing Plan recommended in Section C.1, so that residents have a clear, practical understanding of what can and cannot go in the FOGO bin before the service commences, minimising early contamination and rework.

C.3 FOGO and Behaviour Change, Including Commercial and Institutional Premises

STCA notes that the success of FOGO, like kerbside recycling before it, will ultimately depend on sustained behaviour change rather than the collection system alone. STCA requests that Council set out its behaviour-change strategy for the household FOGO rollout, including how it will build on the existing Small Acts Big Change program and other education activities referenced in the Strategy (p.9), and how success will be measured over time.

STCA understands, though has not verified a specific source, that commercial and institutional food-waste generators – including pubs, clubs, cafes, restaurants and nursing homes – can achieve lower contamination rates and faster, more durable behaviour change than household kerbside FOGO, because food waste in these settings is generated by a smaller number of trained staff in a controlled environment, rather than by a large and varied residential population. STCA asks Council to confirm:

- Whether commercial and institutional FOGO services are being prioritised, or planned in parallel with, the household rollout;
- Whether Council considers commercial and industrial (C&I) waste generally to be a priority alongside the household FOGO program, given the C&I diversion gap identified in Section G below; and
- What specific engagement or incentive strategy is proposed for pubs, clubs, cafes, restaurants and aged care/nursing home operators.

STCA considers that an early, well-supported commercial FOGO rollout could deliver strong, visible diversion gains with comparatively low contamination risk, while the household behaviour-change program is being established and refined.

D. The Case for Fortnightly Red-Bin Collections Has Not Been Demonstrated

D.1 Council's Own Consultation Data Undermines the Case for Reduced Frequency

Council's Strategy documents the results of its 2020/21 community telephone survey (400 completed responses) regarding the two kerbside bins:

Bin	Current Frequency	Consider Frequency Appropriate	Full/Overflowing at Collection
Red-lidded (general waste)	Weekly	92%	40%
Yellow-lidded (recycling)	Fortnightly	77%	51%

(Waste Management Strategy 2021–2031, Community Engagement – Telephone Survey, pp.14–15)

These results were collected under the current weekly collection regime. If 40% of red-lidded bins are already reported full or overflowing on a weekly cycle, halving collection frequency – even after FOGO removes a meaningful share of organic content – risks pushing a substantial proportion of households into regular overflow, particularly during holiday peaks (see Section E.3 below). Notably, Council's own survey table shows the fortnightly-collected yellow-lidded recycling bin already has a materially higher overflow rate (51%) than the weekly red-lidded bin (40%) – directly relevant evidence that moving general waste to a fortnightly cycle carries a real risk of a similar, or worse, overflow outcome.

It is also notable that the resident-focused themes and initiatives tested in Council's own online community survey included “introduction of a third kerbside bin for the collection of garden organics (GO) or Food Organics Garden Organics (FOGO)”, but did not test community support for a reduction in general waste collection frequency. *(Waste Management Strategy 2021–2031, Table 6 – Proposed Resident Focused Themes and Initiatives, p.15)*

In other words, FOGO was specifically tested with the community and received strong support (90% supported “increasing recycling by recovering food and garden organics”, Waste Management Strategy 2021–2031, Online Survey, p.15); a fortnightly general waste service was not put to residents in the same way. STCA submits that a change of this significance should be subject to its own direct, evidence-based consultation rather than being introduced alongside FOGO by implication.

D.2 Information Still Required Before Any Decision

Council has advised that councillors will consider both community feedback and financial analysis before determining whether red-bin services remain weekly or move to fortnightly collection. STCA considers that the following information should be publicly released before any decision is made:

- Forecast waste charges under both options;
- Service level implications;
- Comparative data from similar councils;
- Impacts on vulnerable households;
- Tourism accommodation impacts;
- Illegal dumping risk assessments;
- Contamination risks; and
- Proposed mitigation measures.

Without this information, residents cannot fully assess the consequences of the proposed service changes.

E. Household and Community Impacts

E.1 Large Households

While food waste will transfer to the FOGO stream, many waste types will continue to require disposal via the red bin, including:

- Nappies;
- Incontinence products;
- Sanitary products;
- Pet waste;
- Medical consumables;
- Soft plastics and other non-recyclable materials.

Many large households already utilise most of their available red-bin capacity. STCA is concerned that fortnightly red-bin collections may result in overflowing bins, odour issues, increased vermin and pest attraction, pressure for additional bins, and waste stockpiling on residential properties. Importantly, larger households would continue to pay the same waste charge as smaller households while receiving a reduced level of service.

E.2 Elderly Residents and Vulnerable Households

Port Stephens has a significant ageing population and many residents live alone or rely on support services. Many elderly residents and vulnerable households generate waste streams that cannot be diverted to FOGO, including continence products, medical waste and hygiene products. A fortnightly collection cycle may create genuine health, hygiene and storage challenges for some residents.

STCA believes Council should identify the number of households likely to require exemptions, proposed support measures, hardship arrangements, and medical waste assistance programs. Council should ensure that waste system design reflects the needs of all residents, not simply the average household.

E.3 Tourism Accommodation

Port Stephens is one of New South Wales' major coastal tourism destinations. Holiday accommodation – short-term rentals, apartments, tourist parks, holiday homes and seasonal accommodation providers – experiences high turnover of occupants, visitors unfamiliar with local waste systems, and seasonal spikes in waste generation. The tourism sector already faces challenges with recycling contamination and visitor education.

A fortnightly red-bin service may increase overflowing bins during peak holiday periods, contamination of FOGO bins, additional management costs for accommodation providers, and illegal dumping around communal bin areas. Council should specifically assess how the proposed changes will affect tourism precincts and holiday accommodation providers.

E.4 Strata and Multi-Unit Development

Residents in strata and multi-unit developments – comprising 22% of properties in the LGA – often have limited storage space, shared waste facilities and communal bin management arrangements. (*Waste Management Strategy 2021–2031*, p.7)

These developments face unique challenges including contamination, limited internal storage capacity, odour management, and responsibility for bin presentation and waste sorting. STCA considers that Council should undertake targeted consultation with strata managers and body corporates before reducing red-bin collection frequency.

F. Illegal Dumping Must Be Considered

Illegal dumping remains a significant issue across New South Wales. The NSW EPA reports that 98% of councils identify illegal dumping as a problem, that one in seven councils spend more than \$500,000 annually on clean-up and enforcement, that bulky household items remain the most commonly dumped waste stream, and that kerbsides, roadsides and bushland are the most common dumping locations (NSW EPA, *Illegal Dumping Research Report*).

The NSW EPA's *Illegal Dumping Prevention Strategy* recognises that illegal dumping is driven by a combination of behavioural, service, infrastructure and accessibility factors, and requires more than enforcement alone. STCA is concerned that reducing residual waste collection capacity may have unintended consequences for households already struggling to manage waste.

While there is no evidence that any single demographic group is responsible for illegal dumping, Council should investigate whether barriers such as financial hardship, limited transport access, disability, mobility constraints, mental health challenges, social isolation, and limited capacity to navigate disposal systems are contributing to local illegal dumping trends.

F.1 A Recent and Worsening Trend

STCA members and local residents report that the volume and visibility of illegally dumped waste across the local area appears to have increased noticeably over recent years/months. This is an anecdotal, on-the-ground observation rather than a verified figure, as Council has not to date published local illegal dumping data, trends or hotspot information (see Section D.2 above). STCA reiterates its request that Council publish local dumping statistics so that this trend can be confirmed, quantified and tracked, and so that any link between service changes and dumping behaviour can be properly assessed rather than assumed or dismissed by either side.

F.2 Vulnerable and Low-Income Households at Risk of Increased Dumping

Anecdotal evidence gathered by STCA suggests that at least some of this dumping activity may be associated with low-income and/or low-functioning households – that is, households who cannot afford to pay for the removal of bulky household contents, and/or who lack the capacity to organise disposal in a timely way, until circumstances force action (for example, a house move, a tenancy change, a death in the family, or intervention by a family member, support worker or landlord). In these cases, the volume of accumulated material is often too great to be managed within standard bulky waste entitlements or self-transported to a drop-off facility.

This cohort is materially different from opportunistic or commercial dumping, and the standard enforcement response – detection, fines and prosecution – is unlikely to prevent this type of dumping, and may simply shift Council's costs from prevention into clean-up, investigation and legal action after the fact, without addressing the underlying cause.

STCA recommends that Council investigate and consider targeted support mechanisms for vulnerable households, which could include:

- Means-tested or concession-linked free or subsidised bulky household clean-up assistance, beyond the standard two on-call kerbside collections currently offered;
- Outreach and case-management partnerships with community and social services (e.g. aged care providers, disability services, financial counsellors, mental health and social work services) to identify at-risk households and intervene before dumping occurs;

- A no-cost, no-questions-asked household decluttering assistance program for eligible pensioners, low-income and disability residents, including practical in-home assistance with sorting and staging material for collection;
- Flexible or on-demand collection arrangements for large-volume loads that exceed standard bulky waste limits, rather than requiring residents to self-transport excess material;
- A limited-time amnesty for residents to self-report accumulated waste for assisted removal without penalty; and
- Clearer promotion of, and potentially expanded eligibility for, Council's existing financial assistance arrangements for waste disposal and green bin removal.

STCA considers that proactive investment in these measures is likely to be more cost-effective for Council over time than reactive clean-up and enforcement, and is consistent with the NSW EPA's own recognition that illegal dumping is driven by behavioural, service, infrastructure and accessibility factors rather than non-compliance alone. STCA recommends Council test this anecdotal evidence against its own compliance, ranger and clean-up records (and, where possible, data held by local welfare and community service providers) and, if substantiated, factor targeted vulnerable-household support into the budget and implementation plan for any change to kerbside services.

Before implementation of any change to red-bin collection frequency, Council should publish local illegal dumping trends (including any recent increase), the types of waste most commonly dumped, geographic hotspots, the potential impacts of reduced red-bin collection (including on vulnerable households), and proposed mitigation and support measures. Environmental gains from FOGO should not be offset by increased illegal dumping, stockpiling of waste or declining public amenity – nor by increased clean-up costs falling back on Council and, ultimately, ratepayers.

G. Fairness: Addressing the Largest Diversion Gaps First

G.1 Commercial and Industrial Waste

As set out in Section A.1, the commercial and industrial (C&I) waste stream carries by far the largest diversion shortfall of any stream Council reports. STCA submits that it is not equitable to impose a reduced level of household service – with the impacts on large families, elderly residents, tourism operators, strata residents and vulnerable households described in Sections E and F – while this larger, more addressable gap remains largely unaddressed in the material published to date. Closing it is also likely the more cost-effective diversion opportunity: a smaller number of concentrated C&I premises should, in principle, be easier and cheaper to engage than some 34,721 individual households.

STCA notes this gap is compounded by the ease with which C&I food organics – from the hospitality and aged-care sectors discussed in Section C.3 – could likely be captured with comparatively simple, low-contamination collection arrangements, reinforcing the case for prioritising this stream.

STCA recommends Council report on progress and planned actions to close the C&I diversion gap alongside, and ideally ahead of, any change to household general waste service levels. Doing so would demonstrate that the burden of achieving the Strategy's diversion targets is being shared proportionately across all waste-generating sectors, rather than falling disproportionately on households.

G.2 Construction and Demolition Waste: Remaining Opportunities

While the Strategy reports a 100% diversion rate for construction and demolition (C&D) waste received at the Salamander Bay Waste Transfer Station in 2019/20 (Table 5, p.12), STCA notes this figure reflects only material that is actually received at Council's facility, and almost certainly does not capture the full C&D waste stream generated across the LGA, much of which is likely managed through private contractors and transfer stations outside Council's direct oversight. STCA raises the following questions:

- Is there any further 'low hanging fruit' remaining in the construction and demolition sector beyond what is already captured in Council's reported figures?
- Could realistic and specific waste management strategies be required as a standard condition of Development Approvals, rather than left to voluntary best practice?
- What process does Council have, or propose, to identify and educate the full range of stakeholders in the C&D supply chain, including waste processors, bulk material suppliers, developers, builders and trades, certifiers, and Council planners themselves?

STCA notes the Strategy already commits Council to prepare a waste management chapter within its Development Control Plan (DCP) to inform waste management requirements for different development types (Implementation Plan, p.22). STCA supports this action and recommends it explicitly address the stakeholder groups listed above, with realistic, auditable requirements rather than aspirational guidance alone.

H. Kerbside Recycling Performance and Community Confidence

Council's own data shows kerbside recycling diversion rates declining from a peak of 60% in 2017–18 to 41% in 2019–20 (Waste Management Strategy 2021–2031, Annual Kerbside Tonnages & Diversion Rates 2014–2020, p.11). This 2017–18 peak of 60% is a separate, historical figure from the modelled 60% figure discussed in Section A.1 above (see the verification note there); the two are independently correct and coincide only in value. The Strategy attributes part of this decline to the introduction of the Container Deposit Scheme (CDS) in December 2017, which has diverted a meaningful volume of material (5,676 tonnes since introduction) away from the kerbside recycling bin and into a separate stream (Waste Management Strategy 2021–2031, p.11). However, STCA does not consider CDS is likely to be solely responsible for this decline, and raises the following questions:

- What does Council consider to be the actual cause(s) of the decline in kerbside recycling tonnages, beyond the Container Deposit Scheme?
- What would a genuine improvement in Port Stephens' kerbside recycling system look like, in practical and measurable terms?
- Is the proposed expansion of the range of materials accepted (e.g. soft plastics, polystyrene, textiles, referenced in the Strategy's Resource Recovery Options, p.16) realistic given current market and processing conditions for these materials?
- What initiatives is Council undertaking, or planning, to increase community confidence in recycling outcomes – including support for, and promotion of, the Australian Recycling Label (ARL) to help residents correctly identify recyclable packaging at the point of purchase?
- Is there a more up-to-date kerbside composition audit than the 2020 audit reported in the Strategy (p.13) that is driving the introduction of FOGO? If so, can the results of that audit be shared publicly with the community, consistent with STCA's request in Section A.2 for updated, current data?

STCA considers that community confidence in the existing recycling system is foundational to the success of any new FOGO service – residents who doubt that their yellow-lidded bin contents are genuinely recycled are less likely to engage in careful source-separation of a third bin. Addressing kerbside recycling performance and transparency should therefore be treated as a companion initiative to the FOGO rollout, not a separate or lower-priority matter.

I. Waste Levy, Charges and Financial Transparency

STCA also seeks clarification of the purpose the NSW Government's waste levy is intended to serve in relation to household waste reduction outcomes, and how the levy revenue and its incentive effect factor into Council's financial modelling for the FOGO and collection-frequency proposal. This sits alongside STCA's request in Section A.4 for publication of benchmark processing and transport costs used in Council's planning.

Council has not yet clearly identified the financial implications of the proposed service options. Residents are entitled to understand the current cost per household, the cost of implementing FOGO, the cost difference between weekly and fortnightly red-bin collection, whether any savings will be returned to residents, and the impact on future waste charges.

Many residents are likely to ask: if the red-bin collection frequency is halved, will waste charges decrease? At present, there is insufficient publicly available information to answer this question.

STCA also notes that the Strategy's own Implementation Plan already commits Council to a “waste management services financial model review” (medium-term) to ensure currency, auditability and incorporation of all operational and capital costs, and a review of “waste data management” – Council's weighbridge recording system – (short-term) to ensure waste types are correctly allocated by stream and source. (*Waste Management Strategy 2021–2031, Implementation Plan, p.22*)

STCA requests confirmation of whether these two reviews have been completed, and if so, that their findings be published alongside any financial modelling relied upon to justify a change in collection frequency. If they have not yet been

completed, STCA submits that any cost modelling used to support a frequency change should be treated as provisional pending that work, and financial modelling should be publicly released before any decision is made.

J. Evidence from Comparable Coastal Councils

The fact that FOGO has been successfully implemented elsewhere does not necessarily mean that fortnightly red-bin collections will be appropriate for Port Stephens. Port Stephens has unique characteristics including significant tourism accommodation, seasonal population fluctuations, an ageing population, extensive detached housing, and large areas of bushland and semi-rural development.

Council should provide evidence from comparable coastal councils demonstrating community satisfaction outcomes, contamination rates, illegal dumping impacts, financial outcomes, tourism sector impacts, and impacts on elderly residents and large households – and effectiveness of the strategy in achieving the objectives of waste diversion and generation of marketable products such as compost. Without this information, the community cannot properly assess the risks and benefits of the proposal.

This benchmarking request complements STCA's request in Section A.4 for evidence of 'best in class' performance based on lived experience across NSW councils more broadly, including in relation to alternative processing technologies and regional collaboration models.

K. Governance, Monitoring and Assurance

Neither the Strategy nor the material released in connection with this survey sets out a clear governance, monitoring or assurance framework for the proposed new service model. A change of this scale – introducing a new waste stream and potentially halving general waste collection frequency for approximately 34,721 properties – should be accompanied by a transparent framework for tracking whether it is working, and for correcting course if it is not. (*Waste Management Strategy 2021–2031*, p.7)

STCA recommends that Council commit to the following before, or as part of, implementation:

- Clearly defined key performance indicators, including diversion rate, FOGO and recycling contamination rates, illegal dumping incidents and tonnage, missed collections, and complaint volumes, measured against a published, current baseline;
- Regular public reporting against these indicators (at minimum every six months during the first two years) so residents and Councillors can track outcomes as they occur, rather than only at a single review point;
- Defined review triggers and thresholds – for example, a specified contamination rate or increase in dumping tonnage – that would prompt Council to pause, adjust or reverse any change to red-bin frequency;
- A clear, publicised process and criteria for residents to apply for individual exemptions or additional service (e.g. on medical, large-household or hardship grounds), including expected response timeframes;
- Establishment of a community reference group or advisory panel – including representation from community groups including STCA, seniors, people with disability, and low-income/welfare services – to provide ongoing input during design and roll-out;
- A formal, published review report to Council after 12–24 months of FOGO operation (rather than an informal internal review), incorporating the KPI data above and inviting further public submissions before any decision on red-bin frequency is finalised; and
- Transparent reporting of actual costs and savings against the financial modelling relied upon at the time of the original decision, so assumptions can be tested against outcomes.

Without these assurance mechanisms in place, the community has no reliable way of knowing whether the new system is delivering its intended environmental benefits without unacceptable side effects, and Council has no structured basis for adjusting the service if problems emerge.

L. What Ratepayers Value: Community Waste Priorities

In addition to the specific technical questions addressed above, STCA has sought to capture, in broad terms, what matters most to ratepayers when it comes to waste management services. Based on feedback from STCA members, the following priorities – listed in approximate order of importance – should inform Council's approach to FOGO, collection frequency and the broader Strategy:

1. Avoiding vermin and odour
2. Adequate storage on site
3. A quiet, efficient and clean service
4. A regular, predictable collection service
5. Confidence that outcomes are real (e.g. that recycling is genuinely recycled)
6. Cost-effective waste management provision
7. Disposal and reprocessing having little or no local amenity impact
8. Easily understood strategic objectives

STCA submits that any proposed change to household waste services should be tested against this list. On STCA's assessment, a reduction in red-bin frequency without further evidence risks priorities 1, 2, 4 and 5 in particular, while the matters raised throughout this submission – particularly around FOGO processing detail, kerbside recycling confidence and governance – go directly to priorities 5 and 8.

STCA Recommendations

STCA recommends that Council:

1. Proceed with the introduction of FOGO as proposed.
2. Retain weekly red-bin collection services at the commencement of FOGO.
3. Publish updated (post-2019/20) waste generation, diversion and kerbside composition data, including a current kerbside audit, before finalising any change to collection frequency.
4. Publish a FOGO Implementation and Processing Plan setting out the proposed collection, processing, contamination, odour/vector management, scope of accepted materials, and end-market arrangements, including whether regional/shared processing options have been explored (Sections C.1–C.2).
5. Set out Council's behaviour-change strategy for household FOGO, and confirm whether commercial and institutional premises (pubs, clubs, cafes, restaurants, aged care) are being prioritised for early rollout where uptake would be more readily achievable and contamination would be minimal. (Section C.3)
6. Publish Council's long-term position on landfill and waste transfer infrastructure, including the future of the Summer Hill Waste Management Centre, and confirm whether alternative processing technologies, including waste-to-energy, are being investigated regionally (Section A.4).
7. Publish benchmark processing and transport cost data, and confirm whether the 70% MSW diversion target remains realistic and achievable, supported by best-in-class benchmarking from comparable NSW councils (Sections A.4 and J).
8. Clarify the purpose of the waste levy in relation to household waste reduction outcomes (Section I).
9. Publish detailed financial modelling for both collection options, including confirmation of whether the Strategy's committed financial model and waste data management reviews have been completed (Section I).
10. Report on progress and planned actions to close the larger commercial and industrial (C&I) diversion gap alongside any change to household service levels (Section G.1).
11. Require realistic, resourced waste management strategies as a standard condition of Development Approvals, and confirm education plans for construction and demolition (C&D) sector stakeholders, including processors, bulk material suppliers, developers, builders and trades, certifiers and Council planners (Section G.2).
12. Explain the causes of declining kerbside recycling tonnages, and set out initiatives – including support for the Australian Recycling Label – to rebuild community confidence in recycling outcomes (Section H).

13. Undertake targeted assessment of impacts on large households, elderly residents, medical waste users, tourism accommodation, and strata developments (Section E).
14. Publish local illegal dumping data, including recent trends, and risk assessments (Section F).
15. Investigate and fund targeted support measures for low-income and low-functioning households at risk of illegal dumping, in partnership with local community and social services (Section F.2).
16. Publish benchmarking data from comparable coastal councils on community satisfaction, contamination, financial and tourism outcomes (Section J).
17. Establish a governance and assurance framework – including published KPIs, regular reporting, defined review triggers, an exemptions process and a community reference group – prior to implementation (Section K).
18. Review performance after 12–24 months of FOGO operation, via a formal published report incorporating this data, before considering any reduction in red-bin service levels (Section K).

Conclusion

STCA supports the environmental objectives of FOGO and acknowledges Council's obligation to implement the service. However, support for FOGO should not automatically be interpreted as support for reducing general waste services, nor for proceeding without clarity on how FOGO will be processed or how the new system's performance will be governed and assured.

Council's own Strategy does not yet demonstrate that fortnightly red-bin collections are the most appropriate outcome for a community with Port Stephens' demographic, social and tourism characteristics. That same evidence base points instead to a larger, more cost-effective diversion opportunity in commercial and industrial waste, and confirms that residents were never directly asked whether they support a reduced general waste service. This expanded submission has also raised further questions on Council's long-term disposal and processing infrastructure, the C&I and C&D waste streams, and community trust in kerbside recycling – all relevant to a properly evidenced decision.

Accordingly, STCA supports introducing FOGO now while retaining weekly red-bin collections, backed by current data, transparent processing plans, targeted support for vulnerable households, and robust governance – until that evidence is available.