



FOGO challenges are a collective responsibility

Position Paper

Who we are

The Australian Organics Recycling Association (AORA) is the peak industry body and national voice for businesses across the organics recycling supply chain. AORA envisions a future where recycling and reuse of organic materials within a circular economy is widely understood and supported by all Australians. AORA works to facilitate an operating environment which maximises the recycling and reuse of organic materials, and promotes the benefits of compost, soil conditioners and mulches across the Australian community and business.

Collective ambition to maximise organic recycling benefits

The organics recycling industry (the industry), a segment of the waste and resource recovery sector, is at the forefront of the national, state and local government's agenda to halve organic waste to landfill by 2030, achieve 80% organics diversion from landfill by 2030, implement FOGO service for all households by 2030, reduce emissions to net zero by 2050, and transition to a circular economy.

The challenge lies in translating these targets and policy positions into tangible, enduring outcomes within the timeframes set. Despite this urgency, it's important to note that the organics recycling industry already provides an established foundation - one that can be further leveraged and enabled to maximise regulators' and government's ability to achieve these objectives.

Cascading from the national waste reduction and waste diversion policies and targets are state and territory jurisdiction [waste strategies and action plans](#). Each state and local government jurisdiction is at a different stage within their development, implementation or refresh of an aligned waste management strategy and action plan.

As all the relevant national waste targets are complimentary, this position paper will focus on the industry's contribution and challenges aligned to the **2024 National Waste Policy Action Plan¹ Target 6**: to halve the amount of organic waste sent to landfill for disposal by 2030. Critical to achieving that target is the state and local government's roll out a Food Organic Garden Organic (referred to as **FOGO**) service to all households with a current kerbside waste collection service by 2030.

¹ DCCEEW 2024 National Waste Policy Action Plan ([link](#)), Accessed 11/03/2026.



The Department of Climate Change, Energy, the Environment and Water (DCCEEW) publish an interactive map of organic collection services² of which there are 544 Local Government Areas (LGAs) with access to kerbside collections services. As of July 2025, of these 544 LGAs:

- 200 LGAs have access to a FOGO service (36.7%),
- 75 LGAs have access to a Garden Organics (GO) service, and
- 269 LGAs do not have access to a GO or FOGO service (49% of LGAs).

As there are 49% of LGA's without a GO or FOGO service, we are at an important stage in the national roll out to take stock and share learnings, clarify areas of confusion and constructively engage in the continued implementation from an industry perspective.

This position paper serves two functions:

- acknowledging FOGO rollout progress to date
- providing an informed industry perspective on the key challenges and opportunities within the evolving FOGO ecosystem as further implementation takes place.

Underpinning this paper is the industry's desire to reinforce its commitment - particularly among AORA members - to meeting and exceeding customer, community and regulator expectations for safe, quality, nutrient-rich compost products that support both the industry's long-term growth ambitions and Australia's soil health and environmental needs.

The compost ecosystem

The diagram below outlines the high-level inputs, outputs, regulation and supply chain stakeholders of the organics recycling ecosystem.

² DCCEEW Interactive map of organic collection services ([link](https://www.dcceew.gov.au/environment/protection/waste/food-waste/recovering-organic-waste)) - Accessed 11/3/2026.
<https://www.dcceew.gov.au/environment/protection/waste/food-waste/recovering-organic-waste>

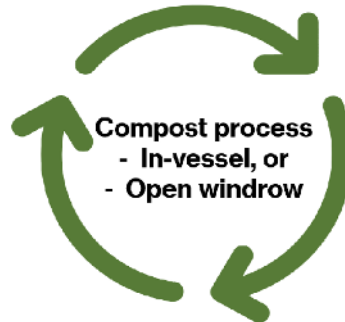


Inputs

- FOGO – household and business
- Kerbside municipal waste
- Agricultural bi-products
- Commercial and industrial organic waste

Supply chain stakeholders

- Waste generators
- Waste collectors
- Transfer and decontamination stations
- State Environment Protection Authorities (EPAs) and agencies
- Federal, state and local government
- Industry associations
- Community



Compliance and benchmarks

- Australian product standard AS 4454 (voluntary)
- State EPA requirements
- Environmental licence requirements
- Social licence and community expectations
- Customer and end market specifications

Outputs and end markets

- Agriculture – soil amendments, compost
- Retail and nursery market – i.e. bagged product
- Built environment
- Urban amenity
- Mine and land rehabilitation

Challenges to solve in turning FOGO into quality compost

Organics recycling is a shared responsibility for everyone in our society and the FOGO value chain. This section outlines the six key challenges organics transfer stations and compost processors face to remain compliant with their regulatory, licence requirements and market expectations in producing safe and quality compost products in an increasingly complex waste and resource recovery system.

1. Clarifying the purpose of a FOGO service

The purpose of a FOGO bin and service is a waste intervention to correctly capture source separated organic materials and divert it to be processed and transformed through a natural process into compost and soil amendment products for improved soil health, fertility and structure.

A FOGO service is a tangible way that households and businesses (where applicable) can play an active role in reducing their organic waste to landfill and participate in the circular economy. The FOGO bin and waste stream should only include organic matter (food and garden waste).

Industry position:

- **Protecting the environment and human health whilst producing safe and quality finished products:** This is paramount and is the industry's primary objective. The industry is focused on sourcing and receiving clean, quality, feedstocks to produce safe and quality in-demand finished products for urban amenity, the built environment, land rehabilitation and agricultural use.
- **Acceptance:** In a household FOGO kerbside service, only Australian certified compostable caddy liners (to Australian Standard AS 4736-2006*) and what you can eat or grow should be put and accepted into a household FOGO bin and service. (*Note: the AS 4736-2006 as at June 2026 is under review of which AORA is an involved stakeholder).

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- **Exceptions:** There are some exceptions to this across the FOGO services offered in Australia due to technology, infrastructure, state-based regulations and individual operators acceptance criteria. It must be highlighted that the introduction of new FOGO services, or the acceptance of materials beyond organics, can directly impact cost, infrastructure investment needs, and compost processing timeframes required to produce safe, quality products.
- **FO and GO (FOGO) is important:** When FOGO is correctly source separated, received into organics recycling facilities and blended with other organic feedstocks (from commercial, industrial and agricultural feedstocks) it adds to the quality of the finished product by adding diversity of microbiology and micronutrients from the composting of the diverse feedstocks.
- **The FOGO contamination challenge:** Currently FOGO contamination rates, vary significantly across FOGO processors and within suburbs, municipal regions and states, from 1% - 15% by weight of inbound volumes. There are many factors contributing to these variances which results in challenges across the supply chain.
- **The industry's current and ambitious target:** Most organics processors are able to process source separated kerbside FOGO and commercial food waste feedstocks with up to a maximum 2% physical contamination (by weight). Hazardous materials, such as batteries, glass, needles and asbestos cannot be accepted under any circumstances. With collective effort, including state and local governments support targeted contamination interventions, AORA expects the 2% target for contamination to be lowered over time.
- **Organics processors need to be supported in imposing cost and contractual requirements:** A shared responsibility is required for the cost of behaviour change, education and contamination management to reinforce the industry's ambition to achieve a maximum 2% contamination of source separated feedstocks.

Industry's first step solution:

- There is a clear role for AORA and state governments to ensure that a clear and compelling story is provided to waste generators (i.e. households), that shares the purpose of a FOGO service and what is created from their FOGO bin 'waste'.

2. Bin collection frequency and its impacts on contamination

The introduction of a FOGO service by local government has resulted in a systems change for households and rate payers. This has been in the form of altered bin sizes and collection frequency to what residents have previously been provided as a waste service covered under their council rates.

The introduction of a FOGO service has typically resulted in a service change as below:

Typical Bin Service	Pre-FOGO introduction (Typical service configuration)	Post-FOGO introduction (typical service configuration)
Red lid bin – general waste	Weekly collection 240L bin	Fortnightly collection Reduced to 120L/140L bin



Green lid bin – Garden waste (FOGO Bin)	Fortnightly collection 240L bin	Weekly collection 240L bin (no bin size change)
Yellow lid bin – glass and paper Recycling	Fortnightly 120L/140L or 240L (Varies by LGA)	Fortnightly 120L/140L or 240L (Varies by LGA)

In some states, the bin service for residents, including collection frequency, is defined in state legislation and may differ between metro and regional areas. This presents an opportunity to review and identify best practice across councils.

There is an opportunity for clear advocacy, with local and state governments, to amend the legislative requirements to enable flexibility to modernise bin collection services and transition to a more waste conscious circular economy and user-centric service design.

NSW research indicates the strongest food waste diversion performance occurs when the service configuration changes the general waste bin to a reduced size and a fortnightly collection, with the introduction of the weekly FOGO service³.

However, organics processors have observed that when the size and collection frequency of the general waste bin is reduced some households put their excess waste into the bin collected weekly, typically the FOGO bin. This is a significant cause of the higher contamination levels being delivered, both from individual bins and from clusters of contaminated bins, that then contaminate the entire load of otherwise clean FOGO.

The quantity of contamination by weight can't be measured until FOGO is unloaded at organics recycling facilities. Measuring contamination is slow, costly, and often impractical, as space is required for tipping and storing FOGO prior to processing. Removal of contamination also results in disposal of a significant proportion of woody organic materials that cannot be cost effectively separated from the contaminants, reducing effective landfill diversion. For these reasons, the cost of, and responsibility for, decontamination is often borne entirely by the organics processor.

Industry Position:

The organics recycling industry strongly supports local governments to have more autonomy and flexibility in their service configuration and design to meet the needs of their residents, community and seasonal fluctuations. Many residents can adapt to smaller bins collected less frequently without contaminating recycling services, but there are always some in any LGA who can't. Where there is a genuine need for additional red bin capacity it must be easily available and capacity to pay must be considered. Where FOGO contamination is unnecessary, deliberate and repeated, bins collection services must be suspended or removed. Collaboration, timely and ongoing consultation, and data sharing is the foundation of a FOGO service that maximises landfill diversion and delivers quality of recycled organics products.

³ <https://www.epa.nsw.gov.au/sites/default/files/2025-02/analysis-nsw-food-and-garden-bin-audit-2023.pdf>
Accessed 7/5/2026.



- **FOGO system performance:** Should prioritise quality diversion, waste conversion and contamination rates over simple maximization of landfill diversion. FOGO service and performance should be measured by the quantity and quality of recycled organics produced, rather than the total tonnes collected.
- **Ongoing education and clear communication:** FOGO messaging should be simple, culturally appropriate, and locally relevant. This is critical to reducing contamination and improving participation. Communications should connect waste generators actions with clear organics recycling outcomes through compelling localised storytelling.
- **Strong accountability mechanisms led by local government:** This is required to manage contamination at the source. Local government and organics recycling service providers should jointly implement consistent contamination management approaches, including automated systems such as AI Contamination Detection (AICD) cameras on collection trucks to identify contaminated bins and loads, and to establish consistent warnings and escalation pathways for repeated non-compliance.
- **FOGO Fit-for-Purpose Service Design:** Design should support both community needs and resource recovery outcomes with flexible, fit-for-purpose service models that balance household amenity, participation, and contamination reduction objectives. This may also involve engagement with other government agencies and services, such as housing and community outreach agencies.
- **Data and evidence-Led Policy:** AORA and state and local governments should align to implement a continuous improvement and evidence-based FOGO service design guide to inform policy from data collected along the supply chain to understand the impacts of collection frequency, contamination management approaches, education programs and interventions on FOGO performance. Product stewardship programs and other parallel waste and resource recovery initiatives should be monitored for their effectiveness. Monitoring, feedback, and adaptive management should underpin long-term FOGO program success and continuous improvement that is shared across local government.

Industry's first step solution:

To back up the industry's message about the quality of material going into FOGO bins, AORA should set up a reliable data feedback loop. This could include a standard way to measure contamination and report on it -so improvements across the FOGO supply chain are guided by real data, not guesswork.

3. Caddy liner use, confusion and behaviour change

There are varied opinions across the organics recycling industry of certified compostable (CC) caddy liners in a FOGO service. Data and studies available from pre, during and post FOGO implementation, show that CC caddy liners do improve household participation and convenience in FOGO services. Importantly they remove potential barriers to participation, such as removing the “ick factor”⁴. Although, there is no one size fits all approach when it comes to the use of CC caddy liners in a FOGO

⁴ [Analysis of NSW Food and Garden Bin Audit Data – August 2023](#) – accessed 7/5/2026



service, from a household, business or processor perspective. The provision or endorsement of CC caddy liners in a local government FOGO service remains largely optional for local governments. There are successful case studies of councils that do and that don't supply CC caddy liners as part of their FOGO service, and both approaches still require ongoing behaviour change and community education.

From an industry perspective, it is evident they do contribute to:

- user confusion about the inclusion of other 'compostable' or 'biodegradable' or 'plant-based materials'. These non-certified compostable bags are not compliant (or haven't been tested) with the established standards (such as AS 4736) and are not accepted into FOGO services. Their inclusion in the FOG bin contributes to physical and chemical contamination.
- Other physical contamination being concealed within an acceptable bag (intentionally or unintentionally.) See photos in **Appendix 1**.

Industry position:

The industry acknowledges CC caddy liners play a role in enabling households to participate in food waste diversion and FOGO services. Although there is a reluctance to encourage CC caddy liners, at the present time, due to the current overall levels of physical contamination in FOGO streams. There are also operational, technological and human difficulties in differentiating (at pace on decontamination lines) between CC caddy liners and all other non-certified bags entering the system.

- **CC caddy liners should be supported where they align with processor capability and shared contamination management strategies between processor and local government:** Acceptance and provision of CC caddy liners should be determined by local government jointly with their FOGO service provider, informed by local processing infrastructure, technology, and operational requirements. AORA supports the use of CC caddy liners as part of the transition to food organics (FO), when supported with clear community behaviour change education and where certification is verified.
- **Costs and benefits of CC caddy liners needs to be evaluated for their impact on participation, contamination, and processing outcomes at a local level between local government and their FOGO service provider:** While liners may support household participation, their operational, contamination, and financial impacts must be considered across the full FOGO supply chain and stage of FOGO service within an area. While caddy liner contamination exists in feedstocks, this may impact price and costs of FOGO processing until such time that shared contamination management strategies and targeted interventions achieve sustained minimum contamination thresholds.
- **Nationally consistent standards and clear CC caddy liner product identification is critical to reducing contamination and consumer confusion:** CC caddy liners should be easily identifiable through nationally standardised certification, labelling, and/or bag colour requirements. This will improve correct disposal behaviour, reduce confusion and costly contamination risks. South Australia has imposed and regulated a successful ban on single-



use plastic bags, replacing all retail produce plastic bags with CC caddy liner bags that can then be used in a FOGO bin. See **Case Study 1**, in *Food Organics and Garden Organics Implementation and Processing Guide*⁵. This systems approach is a successful supply chain intervention that eliminates unintentional use of non-certified CC caddy liners.

- **National regulation and compliance frameworks are required to address misleading environmental claims and greenwashing:** Stronger national oversight is needed to ensure products marketed as 'compostable' meet verified performance standards appropriate for Australian composting processing systems, such as AS 4736. Independent verification is available for manufacturers through the Australian Bioplastics Association certification program⁶ and should be encouraged.
- **Industry's priority is to protect feedstock quality and produce safe quality products:** The use of CC caddy liners must be financial viable and raise the industry's capability to produce safe, quality finished products. Where there is contamination, in part related to CC caddy liners, there needs to be a process in place to support data sharing, and a shared responsibility to address the contamination cause and hot-spot led by the local government with the support of the FOGO processor.

Industry's first step solution:

- Support the current 2026 review process of AS 4736-2006 and the subsequent collective efforts to advocate for more defined and consistent language and guidance on caddy liner products causing confusion in composting feedstocks that claim 'compostable', 'biodegradable', 'plant-based' etc.

4. Hazardous contaminants – i.e batteries, vapes, glass and needles

Hazardous physical contaminants are products that create a significant and unacceptable risk to people, plant, equipment and the environment. These contaminants affect the entire waste and resource recovery supply chain, including organics recycling. These products are entering organics recycling streams incorrectly, without notice and at unacceptable levels, indicating failures elsewhere in the chain. Put simply, hazardous contaminants should not be entering kerbside waste collections

There is currently inadequate large-scale accessible collection, drop-off or extended producer responsibility or stewardship programs for these hazardous waste products across Australia. The community lacks the awareness of the dangers these products present when disposed of incorrectly and there are insufficient incentives to correctly dispose of these products. Without these accessible and large-scale education and product stewardship programs the organics recycling industry will continue to face daily operational risks and escalating financial costs to manage these contaminants.

⁵ <https://www.dcceew.gov.au/sites/default/files/documents/fogo-implementation-and-processing-guide.pdf>
Case Study 1, Accessed 01/06/2026.

⁶ <https://bioplastics.org.au/certification/> accessed 01/06/2026.



The commentary and evidence aligned with the industry's call for urgent national action on all hazardous contaminants is extensive and included in the Senate Inquiry, *No time to waste 2025*⁷, the statutory review of the *Product Stewardship Act 2011*⁸, *ACCC Lithium-ion batteries and consumer product safety Report, 2023*⁹ and most recently sector advocacy leadership from the Australian Council of Recycling's (ACOR) Policy Paper, *When to intervene: A trigger framework for initiating an effective product stewardship and EPR schemes*¹⁰

Industry position:

All organics recycling facilities have made significant investments to ensure the safety of staff and raise awareness across a range of emerging dangerous contaminants being received, the dangers they present and how to safely manage, dispose and escalate incidences involving these contaminants. Coordinated national action and legislation would correctly cost and account for the lifecycle management of these products, such as extended producer responsibility or stewardship schemes.

- **Organics recycling facilities are fast moving and highly mechanical environments:** When these contaminants are received they present operational risks. The impacts and costs are disproportionate to the waste generators, or local governments who are responsible for the waste generators who incorrectly dispose of these items.
- **Governments at all levels should strengthen disposal pathways, incentives, and enforcement mechanisms for hazardous waste materials:** Accessible, affordable, and well-promoted disposal options are required to prevent hazardous materials entering kerbside waste and organics streams. Current regulatory and compliance frameworks do not adequately deter incorrect disposal behaviours or reflect the realities of contamination risk within kerbside collection systems.
- **Regulatory settings and contamination thresholds must be practical, evidence-based, and proportionate to real-world collection system risks:** Zero-tolerance approaches for contaminants such as asbestos may not reflect the uncontrolled or monitored nature of household waste streams and should be supported by risk-based regulatory frameworks.
- **"Accept all" contractual provisions need to be removed:** These are inappropriate where processors cannot reasonably control or have visibility of incoming contamination risks.
- **Improved data sharing and transparency across councils, contractors, and processors:** Timely data-informed reporting and information sharing can support contamination prevention, accountability, intervention strategies and informed contract and regulatory settings.

⁷ https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Wastereduction/Report - accessed 01/06/2026.

⁸ <https://www.dccew.gov.au/environment/protection/waste/publications/product-stewardship-act-review-report> - accessed 01/06/2026.

⁹ <https://www.accc.gov.au/system/files/lithium-ion-batteries.pdf> - accessed 01/06/2026.

¹⁰ <https://acor.org.au/wp-content/uploads/2026/02/260223-ACOR-Product-Stewardship-Trigger-Framework.pdf> - accessed 01/06/2026.



Industry's first step solution:

- AORA and industry to continue advocating to state and federal government with sector peers for urgent national action on all hazardous contaminants to remove these products from kerbside collections.

5. Chemicals of concern and inconsistent jurisdictional interpretations

Chemicals of concern, emerging chemicals of concern and forever chemicals are present in feedstock. Regulating these contaminants at the point of resource recovery simultaneously with new or imminent regulation at the source or manufacturing end of the supply chain is an ineffective approach to removing community concern, mitigating human and environmental harm. A staged, science-based, risk vs benefit assessment is required to underpin a period of transition. This will

Industry Position:

- **There is a need for an integrated and structured national process to efficiently prioritise, evaluate and manage emerging chemicals of concern across the product lifecycle:** In an increasingly circular economy, there is a need for a more integrated and consistent national mechanism for identifying, monitoring, evaluating, and managing new contaminants. This could enhance, or build from the Australian Industrial Chemicals Introduction Scheme (AICIS), the Industrial Chemicals Environmental Management Standard (ICHEMS), the National Environment Management Plan (NEMP 3.0) and be reflected in industry standards such as AS 4454.
- **For efficiency and optimal human and environmental health outcomes, chemicals of concern should be managed with guidance provided through a nationally coordinated, science-based framework:** National guidance should set clear, consistent limits and be embedded within standards, reflect emerging technical feasibility, testing limitations, and evolving scientific understanding. This approach would support alignment and consistent interpretation across jurisdictions, minimise regulatory duplication, and recognise the increasing importance of circular economy outcomes and maintain confidence in compost products and support interstate movement of feedstocks and finished products.
- **Standards and regulatory frameworks should recognise differing feedstock characteristics, end-use applications and risk profiles of compost-derived products:** A fit-for-purpose approach will better reflect product quality, intended use and market needs, while supporting confidence in resource recovery outcomes.
- **Management of chemicals of concern across the supply chain:** Regulatory responses should prioritise prevention and upstream controls where contaminants originate, rather than placing disproportionate responsibility on end-of-stream organic recycling processors.
- **Industry operates at the dynamic intersection of resource recovery and the national agenda to further enable the circular economy to return organic nutrients to the environment:** Organics processors have very little control over the chemical composition of the feedstocks they receive, and little visibility at present to the extent of physical contamination of those feedstocks. This leads to an opportunity for regulators to look at regulation from a circular economy principles lens and outcomes-based approach to



correctly apportion risk, costs, accountability and incentives at the right point in the supply chain.

Industry's first step solution:

- AORA on behalf of industry to continue advocating for national harmonisation of interpretation and application of NEMP 3.0 guidance on limits and transition monitoring for priority emerging contaminants, such as priority PFAS compounds.

6. Processor investment in decontamination infrastructure, innovation and technology

The industry is committed to the transformation of clean, diverse, usable organic feedstocks into safe, quality and in-demand organic recycled products that deliver against end market and customer needs and specification. AORA and the industry is driven by working actively with input feedstock providers and end-users to balance the two in order to return a nutrient and carbon rich organic resource back to the environment to enhance soil health and fertility to support better plant and environmental outcomes.

Contamination in an organics processing facility ranges widely. It includes things like plastic packaging, which staff or machinery can spot and remove on the picking line with relative ease, to the more challenging elements such as broken glass or and sharp needles that are not easily visible. At the most dangerous end, it includes gas cylinders, vapes and batteries — items that can self-combust in a fast, highly mechanical environment, putting people, plant and equipment at risk.

Industry Position:

- **Industry is making significant investments in infrastructure, innovation and technology enhancements:** The industry's continuous improvement approach is occurring across collection, processing, and end-product format development to improve recovery rates, improve product outcomes, improve financial viability and manage ongoing contamination risks.
 - For a single processor that can be a multimillion-dollar piece of equipment, in addition to around the clock staffing for a dedicated decontamination line, and community education officers. These costs and investments need to be factored into FOGO contract costs that are ultimately passed onto rate payers, who are unaware of their intentional or unintentional contamination behaviour and the resulting impacts down-stream.
- **Our waste streams and requirements are growing more complex, yet our kerbside and approach to waste management as a society haven't quite kept pace:** This is evident in outdated contractual terms and conditions that do not reflect shared risk and accountability for a range of persistent and emerging contaminants, linear regulation that isn't keeping pace with circular economy needs and challenges, and escalating risks, costs and systems



thinking interventions not being applied at the most effective point in the waste supply chain.

- **Education and engagement along the waste supply chain is critical to a functioning waste system:** Processor investment in community and waste generator education is filling a structural or information gap that exists or that needs increased focus to reduce identified contamination hot spots or issues. Industry has a collaborative and supportive focus to work with all aligned stakeholders to increase community education to reduce contamination in the most appropriate way for the area, although this needs to be a shared responsibility.
- **There is an opportunity for industry and local government to collaborate and provide regular, timely and usable communication data:** Data on conversion, diversion, and environmental outcomes should demonstrate the value of investment in organics recovery systems and returned local impact of products returned and applied to local public spaces.

Industry's first step solution:

- AORA with industry input should develop a reporting template for processors to share with local government to underpin consistent waste conversion, contamination trend data and impactful local storytelling that compliments existing data collection by local government and EPA's on waste conversion and quality of diversion. This will support end to end visibility and community education messaging around organics recycling and the narrative of what happens to your FOGO waste (FOGO resource).

Appendix 1 – photos of received general and caddy liner type contamination, including a caddy liner concealing non-organic household items.



Appendix 2 – photos of received hazardous physical contaminants, vapes, gas cylinders, plastic, needles, assortment of batteries, and glass.

