

Regulatory Reform Projects
Environment Protection Authority
GPO Box 2607
Adelaide SA 5001

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Via email:

SA EPA epainfo@sa.gov.au;

Mr White: brian.white@sa.gov.au;

Mr Sergi: steven.sergi@sa.gov.au;

Mr Circelli: Tony.Circelli@sa.gov.au;

Dear Mr Circelli,

The National Waste Recycling Industry Council (NWRIC) is the national peak body representing waste and recycling businesses. We work to improve waste and recycling services for all Australians.

Our members¹ and affiliates², service most households and businesses across every State and Territory. The NWRIC's 450 plus members range from small family-owned businesses to multi-billion-dollar global companies. They collectively own and operate nearly every private waste and recycling asset in Australia for collecting, recycling, processing and treating waste.

The NWRIC members work together and cooperatively share a vision for a fair, safe, innovative and sustainable waste and recycling industry. The NWRIC members do this by:

- transforming waste into resources for reuse or energy;
- ensuring the safe handling, disposal and treatment of non-recyclable and hazardous waste; and
- providing a safe and clean environment for the community.

The NWRIC welcomes the opportunity to comment on *South Australia's Consultation on Position statement on Thermal Energy from Waste Activities*.

Response to policy paper

Waste hierarchy

The NWRIC agrees with the SA EPA's positioning of energy recovery on the waste management hierarchy as higher than disposal and below recycling. After all recycling opportunities have been practically achieved, it is surely better to recover energy from the residual material rather than dispose of it to landfill.

Hence the primary function of thermal energy from waste could be categorised as energy recovery from materials which cannot otherwise be economically recovered or reused. It is not disposal of waste and hence should be clearly separated from any equivalence with landfill.

¹ Australia's nine largest waste & recycling companies: Alex Fraser Group (Hanson), Cleanaway, J. J. Richards and Sons, Solo Resource Recovery, Sims Metal Management, Suez, Remondis, ResourceCo and Veolia.

² Waste Recycling Industry Association, Queensland (WRIQ), Waste Contractors and Recyclers Association of NSW (WCRA), The Victorian Waste Management Association (VWMA), Waste Recycling Industry Association of South Australia, Waste Recycling Industry Association of Western Australia (WRIWA) and the Waste Recycling Industry Northern Territory, WRINT.

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Waste levy liability

The proposed application of the solid waste levy to the input stream of energy recovery facilities is inconsistent with its position on the waste hierarchy and will make these facilities commercially unviable. Therefore, the industry is calling for the removal of this provision from the draft statement, in order to incentivise infrastructure with a better environmental outcome.

NWRIC believes this is inconsistent with all other state energy from waste policies. According to South Australia's Recycling Activity Statement³ - the State sent 873,000 tonnes of material to landfill in 2016/17. Despite the State's best efforts to establish a circular economy, not all material is suitable for recycling.

This is typically because the material is too contaminated for either composting or material recovery (due to POPs, heavy metals, PFOS/PFAS or other toxins). The recovery pathway for this material then is either direct combustion to recovery energy and heat, or fuel manufacture.

As the consultation policy position describes, thermal recovery for energy would be subject to a levy, but the manufacture of solids fuels would not. However, the NWRIC recommends the EPA consider that diversion to energy recovery warrants genuine environmental benefit, which is similar to fuel manufacture.

These environmental benefits include;

- A double greenhouse benefit from the displacement of methane generated in landfills, and the displacement of coal use to create electricity.
- The destruction of persistent organic pollutants which may otherwise contaminate groundwater through landfill leachate.

The economic benefits include;

- The creation of low cost energy, some of which is renewable, onto the South Australian grid.
- Jobs resulting from the creation and operation of facilities.

The establishment of thermal energy recovery facilities would also assist the SA Government to meet its State greenhouse and renewable energy targets.

Feedstock eligibility criteria

The inclusion of "wood, timber, or other homogeneous organic waste" as a potential feedstock type is of concern. Despite a number of eligibility criteria that apply to such material, the NWRIC believes this opens up a possible loophole that could be exploited, to the detriment of the currently established, strong and sustainable composting industry. With perhaps the exception of contaminated organic materials. We do not believe that any source separated organic waste materials should be eligible for use in thermal EfW activities.

³ [Green Industries South Australia - South Australia's Recycling Activity in 2016-17.](#)

We raise that contaminated biosolids (with PFOS/PFAS and other persistent organic pollutants, or heavy metals) are suitable only for landfill or energy recovery. Therefore, we propose the strategy consider the end pathway for current or future flows of contaminated biosolids.

Markets for Processed Engineered Fuels

In regard to fuel manufacture, the NWRIC notes that domestic markets for process engineered fuels are largely saturated, and therefore, this material would likely need to be exported. However, as recent export restrictions have indicated, our Asian neighbours may in the future look to turn away international supply in favour of using domestic fuels. Therefore, it is important for government to consider the stability of any overseas and interstate markets when formulating its policy.

As a general principle the NWRIC considers domestic solutions to our waste management problems will create a more resilient industry.

For further information please contact NWRIC Secretary Alex Serpo, (secretariat@nwrlic.com.au - 0417 932 303), in the first instance.

Yours sincerely,



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