NWRIC

May 22, 2017

The Hon. Paul Green, MLC
Parliament House
Macquarie Street
SYDNEY NSW 2000

Dear Sir,

The National Waste and Recycling Industry Council (NWRIC) welcomes the opportunity to comment on the NSW Parliament Legislative Council - *'Energy from waste' technology inquiry*.

The NWRIC is a newly formed waste and recycling industry group representing national businesses and state associations**.** Our members hold the majority of the private market capital invested into waste and recycling assets in Australia. The Council advocates on behalf of these companies and associations (see our website - www.nwric.com.au - for more information).

Following the terms of reference, we offer the following;

A) The current provision of waste disposal and recycling, the impact of waste levies and the capacity (considering issues of location, scale, technology and environmental health) to address the ongoing disposal needs for commercial, industrial, household and hazardous waste.

Waste generation is a function of population and economic growth. As waste volumes grow, the Council supports all well structured initiatives to move Australia towards a circular economy.

In a practical sense, this means the progressive application of the waste hierarchy. Energy recovery (including fuel manufacture) has an important role to play in reducing the environmental impacts and creating more economic value from waste materials.

For the waste hierarchy to operate effectively there needs to be realistic short term (10 year) and long term (30 year) planning. The long term planning needs to be 'statewide' and embrace service delivery, infrastructure and support programs. These programs should include waste generator education, product stewardship, waste levies, market support initiatives and reuse support subsidies.

B) The role of 'energy from waste' technology in addressing waste disposal needs and the resulting impact on the future of the recycling industry.

Waste generation rates are growing quickly. If historical generation rates continue, then Australia could create between 70 and 120 million tonnes of waste by 2040 (up from approximately 50 million tonnes today). The Council is concerned that long term State planning does not reflect the growing need for new waste management and recycling infrastructure.

In regard to planning - the major issues identified by industry at this time are the:

1. Development of economically viable markets for recycled materials such as composted garden waste[1] - and glass[2];

2. Allocation of suitable sites for waste recycling and processing - especially for garden waste composting and organic waste (including food waste) anaerobic digestion and energy recovery facilities;

3. Partial replacement of landfilling with energy recovery in capital cities.

The NWRIC supports the introduction of thermal processing of waste in Australia when new facilities are introduced as part of long term infrastructure planning. This means that energy recovery plants should now be included in larger, statewide plans addressing future needs.

Recent experience in Europe, the UK, North America and Japan clearly demonstrates that modern thermal processing is reliable, and that emissions can be managed in a way which maintains the highest levels of public safety.

Following recent public statements, the Council is concerned with any proposal to introduce large buffer distances into the planning, licensing or development consents for new energy recovery facilities. International experience, and the best available science[3], indicates that energy recovery buffer distances are unnecessary. Further, the Council believes energy recovery facilities should be treated in a similar way to other heavy industry facility applications.

For example a study lead by Dr Phillips of Centre for Energy and Resource Technology, School of Applied Sciences, Cranfield University is one of most comprehensive to date on the long term effects of energy recovery plants on civil amenity. It examined property prices seven years prior and after the establishment of an energy recovery plant in a suburban location in the UK, and found no significant effect resulting from the presence of these facilities.

D) Additional factors which need to be taken into account within regulatory and other processes for approval and operation of 'energy from waste' plants.

The NWRIC accepts that thermal processing is capital intensive and as such should only be considered as a partial response to overall waste management. Energy recovery should be adopted in a manner consistent with the waste hierarchy - after recycling and fuel manufacture - and before landfill. The Council notes that energy recovery facilities operate effectively and safely in both Europe and Asia.

G) The risks of future monopolisation in markets for waste disposal and the potential to enable a 'circular economy' model for the waste disposal industry.

Energy recovery is best applied as part of an integrated plan which considers all levels of the waste hierarchy, alongside social and economic factors. Waste management plans are most effective when

[1] Where transport subsidies are needed to haul needed soil carbon supplements to distant agricultural markets.
[2] Where there is a risk of stockpiling.
[3] See - Assessing the perception and reality of arguments against thermal waste treatment plants in terms of property prices. Waste Management, Volume 34, Issue 1, January 2014, Pages 219–225.

local conditions are considered; including markets, transport distances and the needs/values of the local community.

The Council supports energy recovery where these factors have been weighed carefully. Further, the NWRIC submits that high quality, long term State planning is the first step that is required if we are to ensure that Australia moves towards a sustainable, circular economy.

The Council welcomes feedback on its submission to the NWRIC staff.

Sincerely,

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