

Ms Tracy Mackey
CEO
NSW Environment Protection Authority
PO Box A290
Sydney South NSW 1232

**NATIONAL WASTE AND
RECYCLING INDUSTRY COUNCIL**
ABN 22 617 891 899

28 November 2019

Dear Ms Mackey,

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 national members and state affiliates, service most households and businesses across every State and Territory. The NWRIC through its national members and affiliates represent over 450 businesses ranging from small family-owned operators to multi-billion-dollar global companies. They collectively own and operate nearly every private waste and recycling facility 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:

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

The NWRIC welcomes the opportunity to submit feedback on Mixed Waste Organic Outputs (MWO) Position Statement and Transition Package.

Governance

In October 2018 the EPA revoked the general and specific 'Resource Recovery Orders' and 'Resource Recovery Exemptions' for the application of Mixed Waste Organic Outputs (MWO) to land due to risks associated with chemical and physical contaminants.

Industry is concerned about the lack of notice given to facility operators in revoking the order. In excess of 270,000 tonnes a year of mixed organic compost was being produced from these facilities, after processing about half a million tonnes of municipal waste from more than 25 Councils.

To prevent this in the future the NWRIC requests that the NSW EPA insert a formal impact assessment process that includes consultation with all potentially affected parties in the NSW Waste Regulation prior to any amendment or revocation of a Resource Recovery Order or Exemption.

The development of infrastructure capable of displacing landfill in NSW requires hundreds of million of dollars in investment. Without regulatory certainty, these investments will not occur.

COUNCIL MEMBERSHIP INCLUDES NINE FOUNDING MEMBERS

Cleanaway | JJ Richards and Sons | Remondis
SUEZ | Veolia | Solo | Resource Recovery
Alex Fraser | Sims Metals and ResourceCo.

IT ALSO COMPRISES STATE AND TERRITORY AFFILIATES

Waste Recycling Industry Queensland (WRIQ)
Waste Contractors and Recyclers Association
of NSW & ACT (WCRA) | Victorian Waste
Management Association (VWMA) | Waste
Recycling Industry of South Australia (WRISA)
Waste Recycling Industry of Western Australia
(WRIWA) and the Waste Recycling Industry
Northern Territory (WRINT)

Transition package and stranded infrastructure

The ban on mixed waste organics outputs (MWOO) to land in NSW leaves millions of dollars of mechanical biological treatment (MBT) plants stranded.

The NWRIC requests the following changes to the transition package:

- Extension of the Phase One Transition Package until 2024 or until all facilities are fully operational.
- Extension of the landfill levy exemption beyond February 2020, or until all facilities are fully operational.
- Clearer articulation from government of accepted alternative outputs and markets for facilities processing mixed waste.
- The NWRIC does not believe \$6.5m will be sufficient to meet all transition costs and requests that the amount allocated should not be capped but rather allocated proportional to each facility's situation.

Beyond the initial transition package, a long term plan is needed to transition these plants whether they produce an engineered fuel or process a cleaner source of organics.

Long term infrastructure planning for NSW

The NSW EPA *Waste and Resource Recovery Strategy* aims to increase recycling rates to:

- 70% for municipal solid waste,
- 70% for commercial and industrial waste,
- 80% for construction and demolition waste, and
- increase overall waste diverted from landfill to 75% by 2021.

Given the EPA will no longer be permitting the land application of organics from mixed waste streams, the NWRIC is calling on the government to clearly articulate urgently what infrastructure it will accept to meet these targets.

If it is the intention of Government to replace mixed waste composting with combined food and garden organics (FOGO) recovery services, we caution the rollout of these services will take a minimum of 3-4 years and will require significant education of householders and businesses to prevent contamination.

It is vital Government include a pathway for organics recovery in the 20 year Waste Strategy under development, that includes providing for dedicated 'green zones' where food and organic processing infrastructure can be set up.

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

Yours sincerely,



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