Inner South Canberra Community Council

Business Development Unit
Transport Canberra and City Services
GPO Box 158
Canberra ACT 2601

TCCS.BDU@act.gov.au

cc. Andrew Barr MLA, Shane Rattenbury MLA, Rachel Stephen-Smith MLA, Elizabeth Lee MLA, Candice Burch MLA

ISCCC SUBMISSION ON WASTE-TO-ENERGY POLICY

A. Overview

The Inner South Canberra Community Council (ISCCC) appreciates the opportunity to provide its views on what should be considered as part of an ACT Waste-to-Energy Policy. It is important for such a policy to guide future ACT Government in this domain and, in particular, to provide a coherent policy framework for responding to proposals to establish waste-to-energy facilities in the ACT.

As the ACT Government is aware, inner south Canberra residents were very concerned about the proposal last year for a waste-to-energy facility in Fyshwick. About 200 people attended a public meeting hosted by the ISCCC in response to this proposal in August 2017, and there was overwhelming opposition to the facility. There were many concerns, including impacts on human health, on traffic congestion, on the capacity of the ACT Government to regulate such a facility effectively, and about the likely need for large-scale importation of waste from interstate to make such a facility viable.

Experience with the Fyshwick waste-to-energy proposal, earlier community opposition to the Foy waste-to-fuel proposal, and a long history of poor regulation in the waste, building and construction sectors, convince the ISCCC that:

1. **There is no social licence to operate thermal (hot) waste-to-energy processes.**

2. **There is very little confidence that the ACT Government would monitor and regulate thermal waste-to-energy facilities to the required international standards, and enforce standards in a timely way when they are not being met.**

3. **There would be strong community opposition to the importation of waste from interstate as a means of ensuring viability of an ACT waste facility.**

4. **More detailed consideration is needed of the costs/benefits of a Processed Engineered Fuel (PEF) facility. More broadly, there needs to be a comprehensive cost/benefit analysis of the various options, including health and environmental impacts, commercial viability and competition implications, compared to landfill.**

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5. **A more systematic approach is needed to consideration of how the different waste streams within the 300,000 tonnes going to landfill each year may be dealt with.**

6. **A priority is to find higher order uses and markets for large waste streams such as food and other organics, timber and paper/cardboard.**

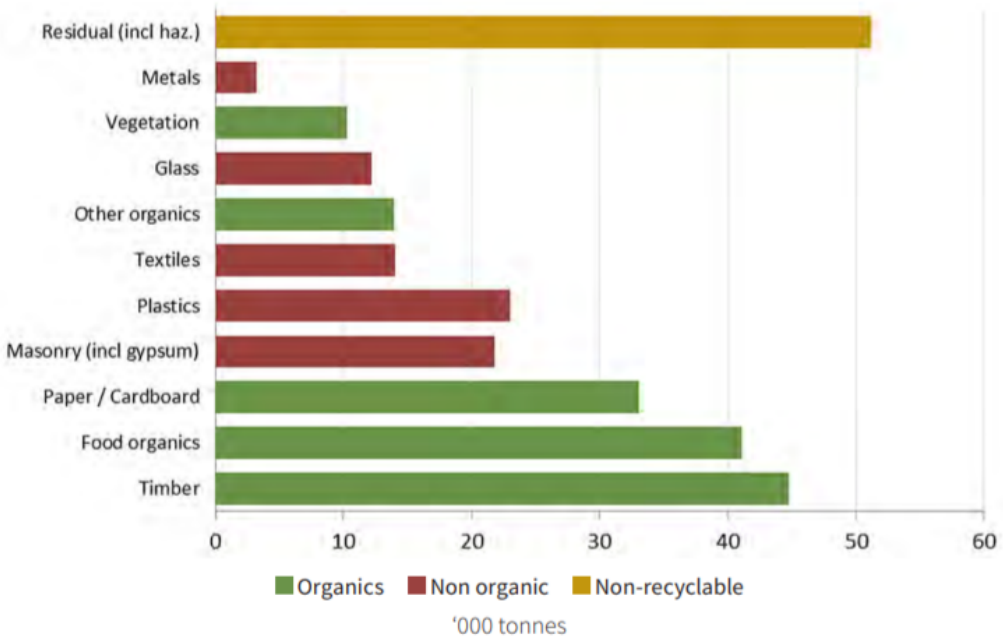
7. **The ISCCC supports other current ACT Government initiatives such as green bins, the new code for waste management in multi-unit developments requiring provision for green bins, and pilot projects exploring how waste in multi-unit developments can be reduced.**

B. Background

The ISCCC is very disappointed that the waste-to-energy information paper did not place the discussion of policy options within a context of information about the composition of waste that goes to landfill. We had to go to the earlier *Waste Feasibility Study Roadmap and Recommendations: Discussion Paper* to find that information.

According to the Waste Feasibility Study, the ACT generates around one million tonnes of waste every year with 70% of the waste diverted from landfill ie about 700,000 tonnes.

Figure 5: Waste streams going to landfill



Source: *Waste Feasibility Study Roadmap and Recommendations: Discussion Paper*, 2018, page 11

As indicated in the figure above, of the remaining 300,000 tonnes going to landfill, timber comprises about 45,000 tonnes, and paper/cardboard less than 35,000 tonnes. One would have thought that higher order uses for those waste streams could be found than incinerating them.

Organics constitute about 65,000 tonnes - about 40,000 food organics, 10,000 vegetation, and under 15,000 other organics. The current ACT Government roll-out of green bins and plans to expand source separation to include food organics should help divert this waste stream from landfill. We

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recognise that there need to be markets for the products, and businesses to process the organic material for those products.

After the above are diverted from landfill, what remains?: plastics; masonry (including gypsum); textiles; glass; and metals. These appear to total about 75,000 tonnes.

Finally 'residual' waste comprises about 50,000 tonnes. This includes hazardous materials, clinical waste, asbestos, and unusable materials such as by-products of other demolition recycling processes. According to the Waste Feasibility Study, this is "waste that is likely to be landfilled in perpetuity as it has no further potential for beneficial use".[1]

C. Conclusion

The ACT Government's *Information Paper: Waste to Energy (WtE) in the ACT*[2] suggests that, on the basis of the Waste Feasibility Study, "the ACT will be unlikely to meet its target of 90% resource recovery, or move beyond 80% resource recovery, without some form of WtE".

Suggesting that the ACT will be unlikely to move beyond 80% resource recovery seems to lack ambition. It means the ACT Government considers it can only divert from landfill about 100,000 tonnes from waste streams identified in the figure above. We would like to understand better the basis for this low ambition, as it is not clear from the information paper.

Certainly, there would not appear to be a sufficiently large waste stream in the ACT to justify the establishment of a thermal waste-to-energy facility that operates 24 hours a day and 7 days a week. Such a facility would probably require importation of waste from other jurisdictions to make it viable. ISCCC experience with community reaction last year to the proposed Fyshwick waste-to-energy facility indicates that any future proposals for such a facility would be opposed strongly by the community.

Insufficient information was provided during this consultation process about the costs/benefits and impacts of Processed Engineered Fuel (PEF) facilities. Indeed, there is no discussion of costs to residents of the ACT, commercial viability and health impacts of each of the options (and compared to the present landfill system). The information paper is also silent on the issue of competition. At present, competitive tenders for waste management are possible because waste collection firms can have equal access to landfill. However, construction of an expensive thermal or non-thermal waste facility would effectively afford the operator a monopoly.

There are further opportunities to reduce waste going to landfill through current and proposed ACT Government initiatives. Besides the roll-out of green bins, and the announced FOGO initiative, the ISCCC is pleased to see that a proposed new code for waste management in multi-unit developments provides for such developments to include green bins. We are also pleased to hear that pilot projects are being carried out to see how waste in multi-unit developments can be reduced. The ISCCC looks forward to seeing the outcome of those pilots, and perhaps in participating in such projects in future.

Regards

Marea Fatseas
Chair
14 December 2018

[1] ACT Government, *Waste Feasibility Study Roadmap and Recommendations: Discussion Paper*, page 11.

[2] ACT Government, *Information Paper: Waste to Energy (WtE) in the ACT,* 2018

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