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11 December 2017

Ms Anthea Sargeant
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2000

Dear Anthea,

RESPONSE TO SUBMISSIONS REPORT SSDA 6236: THE NEXT GENERATION ENERGY FROM WASTE EASTERN CREEK - SUPPLEMENTARY RESPONSE TO SOCIAL LICENCE ISSUES

Reference is made to the Response to Submissions (**RTS**) Report prepared by Urbis Pty Ltd (**Urbis**) on behalf of The Next Generation NSDW Pty Ltd (**TNG**) for the State significant development application (**SSDA**) 6236 and subsequent supplementary response to social licence issues dated 21 October 2017 issued to the Department of Planning and Environment (**DPE**).

The RTS Report addressed the Government, agency, organisation and community submissions lodged in relation to the exhibition of the Amended Environmental Impact Statement (**Amended EIS**) between December 2016 and March 2017. The Supplementary correspondence dated 21 October 2017 identified an additional Proponent Commitments for the TNG Energy from Waste (**the EFW Project**) in response to the issue of social licence that was raised within the submissions and the current Parliamentary Enquiry into Energy from Waste in New South Wales.

This letter is submitted as an addendum to the RTS report and previous correspondence to provide additional information on the Proponent Commitments for the EFW Project.

Background

The Amended EIS at page 382 make the following observation (emphasis added)

The importance of the recovery of energy from waste as part of effective waste management is reflected in *NSW Energy from Waste Policy Statement 2014*.

*The Environmental Protection Authority (EPA) recognises that the recovery of energy and resources from the thermal processing of waste has the potential, as part of an integrated waste management strategy, to **deliver positive outcomes for the community and the environment**. Energy from waste can be a valid pathway for residual waste where:*

- *Further material recovery through reuse, reprocessing or recycling is not financially sustainable or technically achievable;*
- *Community acceptance to operate such a process has been obtained.*



The diversion of waste from landfill, reducing the potential for methane emissions, while also providing a form of low carbon, renewable energy, is recognised by the NSW Government and relevant technical agencies as making an important positive contribution to the targets for dealing with waste.

The commitment identified in the correspondence of 21 October 2017, seeks to further contribute to the as follows:

*Upon the commencement of construction of the EfW Project the Proponent will progressively provide **free of charge** to homeowners of up to 1,000 dwellings in the immediate area, **fully installed**, 3kwh roof top solar installations.*

This commitment will also satisfy the objectives of the National Energy Guarantee Policy that power is provided by a range of methods and will deliver a direct community benefit to residents of the local area.

Update to Statement of Commitments

The Proponent is aware of the continuing concern expressed by the community regarding the composition of waste and the potential for inappropriate materials to enter the waste/fuel stream and result in adverse impacts to the environment and broader community.

The Proponent addressed this issue in the RTS Report by obtaining independent waste audits prepared by accredited waste auditors, EC Sustainable, to determine the waste stream composition that will be received by the EfW Facility. The audits and analysis was submitted to NSW EPA and demonstrate (as expressed within the RTS Report) the following:

- *An absence of hazardous materials or special wastes.*
- *A high degree of homogeneity as a result of the extensive degree of processing to which the materials are subject during resource recovery.*
- *The Quality Control processes to be implemented will maintain chlorine levels well below 1%.*
- *The Quality Control processes to be implemented will ensure Treated Wood Waste continues to be sent to landfill, i.e. not used as feedstock for the facility.*
- *The chemical profile of floc waste demonstrated by the audits is comparable to European results, and given positive results in European examples for processing floc waste, the proposal is supported and provided for in the facility design.*

Notwithstanding the above, the Proponent is cognisant of reassuring the safety of the facility to the community. In response to continued concerns, the Proponent is now making the following addition to the submitted Statement of Commitments, that:

In addition to the 24 x 7 remote computer access monitoring which will be available to the NSW EPA the Proponent will fund [as part of the licence fee] the NSW EPA the cost of employing a full time onsite EPA inspector with full access, empowered to inspect and verify the residual waste fuel stream on a 24 hour basis.

This commitment will be delivered from commencement of operations and during the first full year of commercial operation of the EfW Facility and thereafter as agreed between the facility operator and the regulator based on outcome criteria.



This commitment will deliver full transparency of the waste fuel stream to the regulatory bodies.

If you have any questions please don't hesitate to contact me at on 82337678 or by email cbrown@urbis.com.au.

Kind regards,

A handwritten signature in black ink that reads "Clare Brown". The signature is written in a cursive, flowing style.

Clare Brown
Director