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SUBMISSION TO: WOODLAWN ADVANCED ENERGY RECOVERY CENTRE

Our brief submission focusses on the extent of risk that the Woodlawn facility poses to future recycling of collected materials.

1. The nature of waste to energy facilities requires long term contracts to support their investment and ongoing financial viability. Consequently it can lock in a lower value single use of potential recyclables as opposed to the far better pathway of a circular economy such as FOGO and reuse. This unwelcome situation will be highlighted in local and state government reporting with a distinction being made between energy and other recycling activity in waste management reports (as occurs in the National Waste Report). Energy recovery proponents have always focussed on the "diversion from landfill" outcome, rather than circular economy.

It is notable that energy from waste facilities in Europe, frequently championed by proponents, are being downgraded under circular economy strategies, both as acceptable parts of advanced strategies and as greenhouse gas contributors.

2. Veolia already have waste supply contracts with councils via the landfill disposal route and the proposal allows Veolia to apportion this supply (380,000t of "residual waste") to energy production, without regard to the council or regional group of councils' (and the community's) higher value recycling desires and targets in their waste management plans both now and in the future.
3. Appendix I notes that 80% of Veolia's contracted supply is energy from waste eligible with the consultant stating that government recycling stretch targets are unlikely to be achieved. This appears to be integrating recycling failure (and the current energy from waste policy thresholds) over the next 10-20 years into the proposal. In fact it is likely that the targets (for example, plastics) will be increased over that time – not be unachievable. The recycling of our MSW and C&I waste is currently under significant review due to international, domestic and public pressures. The large Veolia proposal should not inhibit in any way, the development of better outcomes.
4. The proposal relies on the current sorting approach producing residual waste under low quality technology, prior to arriving at the energy facility with what appears to be an entirely unacceptable check via a limited, single annual audit at the incinerator entrance (see Appendix G, S6.4, p18).

5. In general, the checking approach both for recyclables and undesirable wastes when classified as residual wastes, with emission risks from the mixed waste receivables, is inadequate. A better approach would be to test every batch with more advanced techniques, not periodically.

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Director

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