

ACOR POLICY STATEMENT RESOURCE DERIVED FUELS (Energy from Waste)

1. Studies have concluded that the potential exists for over 10% of our electricity needs could be met by Energy from recovered source materials. This potential resource (which is currently being wasted to landfill) can be recovered as energy by effective Policy on Energy from Non-Standard Fuels.
2. ACOR supports a policy which encourages the recovery of this resource, while avoiding unacceptable adverse impacts on the community or the environment.
3. The Policy should encourage recovery of energy utilising a variety of existing & potential source materials and technologies, including co-firing and dedicated energy plants, where this can be done safely & sustainably
4. All source materials for Non-standard Fuels should be pre-processed to separate materials and recover recyclables where economically recoverable, so that only residual streams are directed to the production of Non-standard fuels. ACOR does not however support predetermined recycling thresholds (as these will vary from source to source).
5. ACOR believes the Policy should direct its focus to protection of the environment by reference to emission standards rather than by attempting detailed regulation of inputs. Industry should employ the most effective & economical strategies for resource recovery in fuel design.
6. ACOR believes these fuels should not be subject to regulation of input specifications. Provided recyclables and 'hazardous wastes' are removed before fuel manufacture, any attempt to regulate the input specifications of these engineered fuels, whether from mixed sources or otherwise, creates unnecessary technical and legal complexity. Fuel should be designed to the specification of the customer to meet the technical requirements of the energy plant. The control of environmental impacts should principally be managed by regulation of emissions at the energy plant, which will in turn dictate the necessary quality of fuel sources.
7. The use of recovered non-standard fuels should not impose unnecessary or excessive monitoring or regulation beyond that needed to protect the receiving environment. Appropriate emission standards, modelled on European standards, having

regard to national and international practice for monitoring & auditing, should be applied to energy recovery & co-firing plants.

8. The use of non standard fuels for co-firing energy or other production plants using standard fuels should not result in a material change of license conditions where emissions standards are otherwise met.

25 October 2011