



26/ 76 Doggett Street, Newstead
QLD 4006
Phone 1300 795 822
Email admin@acor.org.au
www.acor.org.au
ABN 60 574 301 921

27 July 2015

Metropolitan Waste and Resource Recovery Group

Email: market.assessment@mwrp.vic.gov.au

To Whom It May Concern,

The Australian Council of Recycling (ACOR) would like to make this submission on Metropolitan Waste and Resource Recovery Group's (MWRRG) Waste and Resource Recovery Industry Market Assessment (the Assessment).

ACOR is the peak national industry representative of Australia's resource recovery industry. It represents the industry in advancing its contribution to a profitable circular economy.

While the Assessment encourages proposal to raise the bar with technological advancements in resource recovery, it seems that the Assessment has a rather regressive focus on the potential for new landfill.

Given the objective of the market assessment process is "to gauge the future options and opportunities, challenges and constraints that are facing the waste sector", in order to shape the directions in the development of the draft implementation plan, it would be concerning if MWRRG was inundated with ideas about the development of new landfills, rather than getting more progressive, modern perspectives.

In addition, the contextual information in the Assessment sets out projections for Melbourne waste generation to increase significantly (i.e. from currently 12.8mt to 16.5mt by 2042). In particular, ACOR expresses significant concern on page 10 that:

*"It is estimated that by 2042 approximately 4.2 million tonnes of material will require disposal in the metropolitan region. The projections indicate that **an additional one million tonnes of annual capacity will be required above 2013/14 disposal figures**. The requirement for additional capacity is further compounded when the projected closure of currently operational landfills is factored in".*

This 4.2mt disposal from 16.5mt generation suggests that MWRRG does not expect the resource recovery rate to exceed 75% in the next 30 years. Considering the statewide NSW target is 75% by 2021, and SA and the ACT are already achieving their recycling targets (i.e. above 75%), the lack of aspirational thinking by MWRRG is a quite worrying as it sets out to develop its long term infrastructure priorities.

On page 11, figure 4 (projected disposal) and figure 5 (composition to landfill) show in order to maintain disposal around 3mt per annum (rather than increase 4.2mt per annum) they would need to capture less than 30% of the residual waste stream presumed to be disposed and, considering the composition, there are clearly multiple options that have been well demonstrated in Australia. Most importantly, considering a whole new suite of Energy from Waste options are now becoming available given EPA Victoria's Energy from Waste (EfW) Policy.

On MWRRG's numbers, maintaining existing disposal volumes in 2042 would require about 82% overall diversion rate. Noting there are several countries already exceeding this recovery rate, it clearly is not an impossible goal for Melbourne to keep pace with increasing waste generation by increasing resource recovery capacity, rather than planning to increase tonnes disposed.

In general, ACOR does not see the necessity for new landfills to be included in MWRRG's long term infrastructure plans given the availability of advanced waste treatment technologies, including MBTs and EfW facilities that have been proven internationally and in other Australian jurisdictions. The projections of an additional one million tonnes per annum to landfill by 2042 is completely out of step with other progressive world cities which are planning for significant reductions in disposal volumes over time. Surely the absolute minimum standard for a modern, long term regional plan is to not increase landfill disposal tonnages. A slightly more progressive goal would be to reduce disposal volume over time.

Yours sincerely,



Grant Musgrove

Chief Executive Officer