



## **ACOR SUBMISSION TO QUEENSLAND ENERGY FROM WASTE POLICY DISCUSSION PAPER**

The Australian Council of Recycling (ACOR) takes this opportunity to provide a submission to the Queensland Government's Energy from Waste (EfW) Policy Discussion Paper.

ACOR is the national peak body for the recycling sector with some 50 member companies operating across the spectrum of recycling activities of:

- recyclate collection, sorting, reprocessing and recycled content product manufacturing;
- recycling supply chains in the municipal, commercial & industrial, and construction & demolition spheres, including packaging from all spheres, and;
- recyclate streams from domestic kerbside materials to e-waste materials.

The resource recovery sector in Australia, including value-adding to collected glass, metal, plastic and paper packaging recyclate and its remanufacture into new products, represents around 50,000 employees and around \$20 billion of contribution to GDP (while the packaging sector is thought to employ around 30,000 people and contribute around \$15 billion to GDP.)

In general, ACOR believes that EfW does have a role in integrated waste minimisation and should be considered a legitimate means of resource recovery. The role of EfW should fit within the waste hierarchy and be complementary of "conventional" recycling systems, particularly in terms of extracting environmental and other value from residual wastes from recyclate collection, sorting and remanufacturing processes.

To that end, together with other resource recovery infrastructure, governments need to make planning provision for EfW. It is also noted that EfW can take a number of

forms and scales, including large-scale MSW and small to mid scale PEF or RDF using pre-processed fuel.

We consider the development of an EfW policy to be a necessary and positive step.

### **General Comments on Proposed Principles**

ACOR generally supports the proposed principles, in particular those that support and protect the waste hierarchy and the ability of the recycling industries to operate at a higher order than EfW. These include the principles below:

- Principle 2. The Queensland Government must consistently apply the waste hierarchy. Regulation and policy must ensure that energy recovery does not undermine recycling, and that disposal does not undermine appropriate energy recovery.
- Principle 3. Energy recovery is only appropriate for residual wastes which it is not practically or economically viable to recycle.
- Principle 4. The composition of residual waste will change over time as recycling improves and Queensland transitions to a circular economy. EfW facilities must be designed to accommodate this change.

As always, the devil is in the detail and in how these principles are included in the policy, considered during planning and environmental approvals, and monitored during operation of EfW facilities.

Key to protection of the waste hierarchy is the definition of “residual” waste and how this definition may change over time. This applies to all waste streams, as well as for the residuals from recycling facilities such as MRFs.

### **Consultation questions**

Specific comments on relevant consultation questions is provided below.

- *Question 1: Do you agree that energy should be extracted from residual waste materials rather than disposing of those materials to landfill, if there*

*are no other available alternatives for reusing or recycling the waste materials?*

ACOR Response: As expressed above, ACOR believes that EfW does have a role and is legitimate resource recovery. The role of EfW should fit in the waste hierarchy and be complementary of "conventional" recycling systems, particularly in terms of extracting environmental and other value from residual wastes.

- *Question 4: What role should facility operators, collection contractors and local councils be expected to play in ensuring that only appropriate residual waste is accepted for energy recovery?*

ACOR Response: Consistent with the current policy and regulatory framework for waste facilities, the environmental authority for an EfW facility is responsible for clearly articulating waste acceptance criteria. The operator is then responsible for operating within these criteria.

ACOR believes responsibility should remain with the State Government in terms of environmental monitoring of EfW facilities.

The State Government also has the key role for establishing the strategies and policies that dictate the definition of residual for each of the different waste streams that may be produced or transported by local councils or collection contractors.

- *Question 5: What should the requirements be for safeguarding current and future resource recovery? Does the solution involve segregation, pre-processing or both?*

ACOR Response:

The necessary safeguards for resource recovery include far more actions and policies than just segregation or pre-processing. For example, developing appropriate procurement and product stewardship regimes that have clear growth pathways to ensure the commercial viability of the higher-

order recycling industry and to allow the recycling industry to invest and grow over time.

At a practical level, the requirements for safeguarding current and future resource recovery are likely to differ for different waste streams due to the differences in the practical or economic viability of recycling and how this may change over time. For example, for MSW, the solution may focus on source separation (ie separation at the household). For C&I and C&D waste streams it may focus on pre-processing with a push for greater source separation of particular waste streams over time.

*Question 6: Should the Queensland Government ban specific materials from landfill, or from both landfill and EfW facilities?*

ACOR Response: Landfill bans need to be considered on a nationally coordinated basis in order to prevent waste leakage and market distortions.

- *Question 9: What aspects of the current planning and assessment framework do you think require clarification?*

ACOR Response: As expressed in previous Queensland Government waste sector consultations, ACOR believes there needs to be greater emphasis on establishing a strategic waste planning and development consent framework, including for infrastructure projects of regional or State significance. This applies for both recycling and EfW facilities.

