



ILLAWARRA PILOT JOINT ORGANISATION SUBMISSION TO ENERGY FROM WATSE INQUIRY

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INTRODUCTION

The Illawarra Pilot Joint Organisation (IPJO) is the peak organisation representing Local Government in the Illawarra and Shoalhaven regions. Member Councils include Kiama Municipal, Shellharbour City, Shoalhaven City and Wollongong City Councils.

The IPJO, previously operating as a voluntary association of local government for over 30 years, has continued since 2015 to provide a platform for collaboration under the model it established as one of 5 pilot areas working with State Government. Enablement legislation as a local government entity is expected once consultation on boundaries of other regional joint organisation areas across NSW is completed.

IPJO's boundaries align with State Department of Planning's Illawarra Shoalhaven Regional Plan (ISRP) and the Chair of the IPJO is a joint Chair with the Department of Planning of the Coordinating and Monitoring Committee for that ISRP. The evidence-based ISRP is the principal document supporting the IPJO strategic directions.



IPJO's vision for the region is for “a confident, vibrant and productive region that maximises its potential and looks after its people and environment.”

COMMENT

a) the current provision of waste disposal and recycling

Like other regional areas in NSW, Councils in the Illawarra Shoalhaven are engaged in all aspects of the provision of domestic and some commercial waste disposal and recycling. Unlike within the Sydney metropolitan region, this means the provision, management and eventual decommissioning of landfill facilities, in addition to other functions common to the Sydney metropolitan area such as provision of domestic waste collection services, recycling centres, and waste avoidance and minimization projects.

The region faces some unique challenges. Proximity to the Sydney metropolitan area creates extra pressures on the region's environment and communities from such things as externally generated illegal dumping, from very high tourism visitation, and even from waterborne carried litter washing ashore.

The region also faces challenges shared with other regional areas of dispersed population across a vast area, adding transportation costs to every aspect of waste management.

In addition to individual Council responsibilities and waste industry responses and initiatives, regional collaboration and coordination of effort is funded by the EPA and undertaken by IPJO.

the impact of waste levies

The NSW Government has announced that the Waste Less Recycle More (WLRM) initiative has been extended for a further four years ([attachment 1](#)) with reduced funding. The WLRM Extension initiative continues to be funded from the NSW Waste & Environment Levy. \$465.7 million was provided under WLRM 1 and yet only \$337 million is to be provided under WLRM 2. State budget forward estimates are for the levy to raise \$2,234 million in the 4 year period to 2020. Wollongong, Shellharbour and Shoalhaven communities alone estimate they will contribute nearly 40% of the WLRM 2 (a total of over \$130 million) via the levy. Yet the WLRM 1 and 2 fund programs across many areas of the State not subject to the Levy.

The levy continues to increase revenue to the State Government (\$675M last financial year - \$91M more than in 2014/5). Despite achieving its intent of making the cost of landfilling very high, this is not always having the expected outcome of reducing waste to landfill by driving the competitiveness of expensive alternative technological solutions. Meanwhile population increases and consumerism / consumption increases are tending to offset the gains from increased recycling ... particularly in regional areas where distance plays such a large factor in trying to aggregate sufficient waste to justify the alternatives. Councils in regional areas face the challenge of maintaining an adequate income stream to fund landfill operation fixed costs, as they would still be required for some waste streams not suitable for AWTs.

and the capacity (considering issues of location, scale, technology and environmental health) to address the ongoing disposal needs for commercial, industrial, household and hazardous waste

IPJO is currently undertaking a review of the previous regional waste strategy and developing a new regional waste strategy. Capacity to address the ongoing disposal needs of the region is being assessed as part of that strategic planning. While less constrained than the highly urbanized Sydney metropolitan area, the pressure of urbanization within the Illawarra and Shoalhaven is a very real factor impacting capacity, as is the increasing expectation of our communities that waste disposal impacts be reduced. Odour and transport impacts continue to be the most significant community concerns for the location or expansion of waste technologies in rapidly urbanizing environments and the region faces environmental constraints on suitably locating many industrial or problem commercial facilities, which leads to expensive competition for the suitable sites.

b) the role of ‘energy from waste’ technology in addressing waste disposal needs and the resulting impact on the future of the recycling industry.

IPJO is interested in the potential role of “energy from waste” solutions but feels that its Councils and the communities they represent are largely uninformed on such solutions and their benefits or otherwise. It therefore welcomes this Inquiry as the commencement of informed debate on the matter and would like to see the Committee bring the debate to the region. Discussion of waste management options is too often required to be undertaken in a highly charged and emotive context of specific proposals engendering “nimbyism” and negativity.

IPJO shares community concerns that the waste management hierarchy of “reduce, reuse, recycle” may be disrupted by ‘energy from waste’ technology and the many gains made to embed the philosophy of the hierarchy could be lost. They also consider that the precautionary principle should be invoked when considering the potential of such technology.

c) current regulatory standards, guidelines and policy statements overlooking ‘energy from waste’ technology, including reference to regulations covering:

i. the European Union

ii. United States of America

iii. international best practice

No comment.

d) additional factors which need to be taken into account within regulatory and other processes for approval and operation of ‘energy from waste’ plants

IPJO would like to stress that the application of international best practice and regulations from other jurisdictions should always be tested in the Australian context with due regard to its unique environmental, geographical, attitudinal, and cultural sensitivities and aspirations.

e) the responsibility given to state and local government authorities in the environmental monitoring of 'energy from waste' facilities

No comment.

f) opportunities to incorporate future advances in technology into any operating 'energy from waste' facility

No comment.

g) the risks of future monopolisation in markets for waste disposal and the potential to enable a 'circular economy' model for the waste disposal industry, and

No comment.

h) any other related matter.

No comment.