

12 February 2026

Parliament of NSW
ATTN: Select Committee on Proposed Energy from Waste Facilities
GPO Box 5341
SYDNEY NSW 2001

Dear Sir/Madam,

Re: Supplementary Questions from the Select Committee on Proposed Energy from Waste Facilities

The Parks, Sydney's Parkland Councils, welcome the opportunity to answer the supplementary questions from the select committee on proposed Energy from Waste (EfW) facilities.

Responses to the Supplementary Questions:

1) Councils gave evidence that waste should, where possible, be managed close to its source. What cost, operational and system impacts arise when residual waste is transported long distances from metropolitan areas to regional facilities?

While transport costs associated with long-distance waste haulage are absorbed within waste collection and disposal contracts and are not, in isolation, the primary concern, the broader operational and system impacts are more significant.

Rail freight is generally one of the more efficient modes of transport for moving large volumes of material over long distances, with potential to reduce heavy vehicle movements on local roads compared to road haulage. Sydney's current waste export by rail is facilitated largely through dedicated transfer terminals at Clyde and Banksmeadow, where residual waste is containerised and loaded onto freight trains for transport to regional facilities. However, councils' main issue is their inability to utilise these rail options as the Southern Freight Line, which connects Sydney to Woodlawn, is effectively at capacity on this route. Further, due to excessive travel times for heavy vehicles within the Sydney metropolitan area, it is not currently practicable for councils in Greater Western Sydney to utilise the Clyde or Banksmeadow intermodals, further limiting their access to Woodlawn. The Spring Farm waste transfer station is approximately 2 km away from the Southern Freight Line, yet waste is trucked approximately 50km each way to the Lucas Heights landfill.

The current inequity of access to waste facilities across Sydney should be considered when reviewing future access to the proposed EfW facilities which will rely on rail freight. Additional waste transfer stations and intermodal infrastructure is required to permit greater access for councils, for example an intermodal near the Spring Farm waste transfer station would

potentially benefit several of The Parks councils. It is also suggested that the State Government considers funding critical waste infrastructure, such as waste transfer stations and intermodals, if private investment is not forthcoming. Without such investment, equity of access to waste facilities will remain limited, raising concerns around efficiency, limited competition, and a lack of system resilience.

The Lucas Heights landfill is expected to reach capacity around 2030, and an extension project has been proposed that could extend operations into the 2040s, subject to planning approvals, which is consistent with objectives of the NSW Waste and Circular Infrastructure Plan. Uncertainty around the ongoing viability of Lucas Heights highlights the need for planning certainty, alternative waste disposal options, effective waste diversion and recovery measures to reduce pressure on the facility.

2) How does increased heavy vehicle waste transport affect councils' obligations and costs in relation to local road infrastructure, including maintenance standards and liability exposure?

Where rail transport is unavailable or constrained, councils are reliant on heavy vehicle transport to move residual waste. Heavy vehicles have a disproportionate impact on road wear and damage when compared with passenger vehicles, resulting in higher maintenance requirements and accelerated deterioration of local road assets. These impacts place additional financial and operational burdens on councils, which are responsible for maintaining local road networks but often lack control over waste transport routes.

It is noted that some proposed regional facilities, including at Parkes and Tarago, intend to transport waste primarily by rail, which would significantly reduce these impacts. However, rail access is not universal and should not be assumed as a default solution unless there is substantial investment in waste transfer and intermodal infrastructure as noted in the response to question 1.

Aside from the expansion of existing landfills, there are opportunities to reduce the need for long-distance transport through smaller-scale local waste treatment. This includes treatment technologies such as anaerobic digestion, pyrolysis and gasification which can be applied to several different and complimentary feedstocks including municipal waste, plastics, tyres, and FOGO. There are also examples of local government led waste treatment initiatives which should be supported, including Liverpool City Council's 'Croc' mattress shredder and associated Green Ceramics MICROfactorie¹ which produces tiles from recovered mattress materials for use in kitchens and bathrooms.

These examples demonstrate the potential benefits of planning certainty and regional support for smaller-scale, locally based waste treatment infrastructure.

3) How does reliance on long-distance transport of residual waste constrain councils' ability to plan, justify or invest in local waste, recycling or landfill infrastructure over the life of existing and proposed EfW facilities?

Reliance on long-distance transport of residual waste to a small number of regional EfW facilities constrains councils' ability to plan for, justify, or invest in local waste infrastructure over the life of existing and proposed facilities.

¹ Liverpool Council MICROfactorie <https://www.smart.unsw.edu.au/news-events/news/new-green-ceramics-microfactorie-liverpool>

In effect, this creates a limited number of disposal pathways, increasing the risk of a de facto duopoly in residual waste disposal. Such concentration reduces system resilience, particularly in the event of an unplanned outage, emergency shutdown, or contractual dispute involving an EfW facility.

This reliance can also discourage investment in waste transfer stations and alternative infrastructure, further limiting councils' operational flexibility. Importantly, it may crowd out consideration of innovative or smaller-scale treatment options.

4) How does the current level and structure of funding available to councils compare with the costs and responsibilities involved in managing residual waste, particularly where waste is transported long distances to regional facilities rather than managed locally?

Sydney's waste disposal costs are among the most expensive in Australia due to several factors, including:

- the highest waste levy in the country, currently \$174.20 per tonne;
- a limited number of contractors capable of delivering municipal waste collection services; and
- a constrained number of landfill and disposal options, compounded by restricted access to intermodal facilities, which effectively limits disposal sites.

These costs, and any increases, are ultimately transferred onto ratepayers through council rates. Since 2010, IPART has decided not to limit the increases councils can pass on for domestic waste management² which is partly due to many Councils' waste management costs increasing at a rate higher than CPI. Because the community generally does not link increases in rates with rising waste disposal costs, there is little financial incentive for households to reduce, reuse, or divert waste from landfill, other than being limited by the size of their red bin. This contrasts with the primary intent of the waste levy which is to drive a circular economy by making landfill disposal more expensive.

5) Based on council experience with long-term waste contracts, how does reliance on a small number of regional EfW facilities affect councils' exposure to contractual, financial or service risks if those facilities are disrupted or constrained?

Based on councils' experience with long-term waste contracts, reliance on a small number of regional EfW facilities increases exposure to contractual, financial, and service delivery risks if those facilities become disrupted or constrained.

This risk profile is not dissimilar to the current situation, where a large proportion of Sydney's residual waste is transported to the Woodlawn facility. Such concentration reduces councils' bargaining power, limits alternative disposal pathways, and increases the potential for cost escalation or service disruption.

6) How does long-term reliance on regional residual waste facilities affect councils' ability to respond to future changes in waste policy, recycling targets or emerging waste technologies?

Long-term reliance on regional residual waste facilities may limit councils' ability to respond to future changes in waste policy, recycling targets, or emerging waste treatment technologies.

² IPART Domestic waste management annual charges <https://www.ipart.nsw.gov.au/domestic-waste-management-annual-charges>

Long contract durations and infrastructure lock-in can constrain councils' flexibility to adopt improved or lower-impact solutions as they become available.

It is imperative that any proposed Energy from Waste (EfW) facility operates in a manner that maximises diversion of recyclable and reusable materials prior to treatment, so that the EfW process does not undermine existing recycling streams and Waste and Sustainable Materials (WaSM) strategy targets. It is acknowledged that the current NSW Energy from Waste Policy Statement captures this.

7) Councils gave evidence that landfill will remain unavoidable for managing residual waste, and that current waste reduction and recycling targets are not being met. Given the current waste strategy does not provide a clear pathway for maintaining or expanding landfill capacity, what elements would need to be addressed for the strategy to function as a complete and workable system rather than relying primarily on regional EfW facilities?

The NSW Waste and Circular Infrastructure Plan proposes to streamline approvals, particularly for infrastructure and the expansion of existing landfills, but is ultimately reliant on industry to drive expansion. The previous lack of public and private investment has led to the current waste crisis. We seek a holistic, whole-of-government approach to waste management that includes consideration of state-funded infrastructure where necessary. This is not unprecedented; for example, Sydney Water, as a statutory state-owned corporation, is currently investing in a biorefinery that will have capacity to process FOGO waste.

Councils also support outcomes of the WaSM strategy such as plastic reduction targets, and the Draft Product Lifecycle Responsibility Regulation which will allow for expanded and mandated product stewardship schemes. Priority products include soft plastics, e-waste, waste tyres, and batteries (both embedded and loose). Batteries, including those in low-cost imported consumer goods sold online, are causing significant operational and safety risks, including truck fires, emergency tipping of hot loads, and facility fires. Councils would appreciate mandatory product stewardships schemes taking ownership of collection and recycling of some waste streams.

Notwithstanding, Australia's circularity rate is currently around 4.3% and is lower than the global rate of 6.9%³ and further work needs to be done to improve this.

Ethical and transparent waste management is also necessary. Oversight is needed to ensure Australian waste is not illegally exported, contributing to environmental pollution or modern slavery, as has been observed in relation to e-waste and textiles.

8) Could you please advise if each of your member councils would support an energy-from-waste facility located in their Local Government Area?

Currently none of The Parks' Waste Alliance councils, being Camden City Council, Campbelltown Council, Liverpool City Council, Penrith City Council and Wollondilly Shire Council, have adopted a formal position supporting EfW, noting that currently EfW is prohibited in Greater Sydney, and there are currently no proposals for such a facility.

Any future proposals would need to be subject to a rigorous planning and assessment process, including consideration of environmental, social, and community impacts.

³ ABS Circular Economy <https://www.abs.gov.au/statistics/measuring-what-matters/measuring-what-matters-themes-and-indicators/sustainable/circular-economy#:~:text=In%202024%2C%20the%20circularity%20rate,the%20Circularity%20Gap%20Report%202025>

The Parks' councils remain committed to achieving their waste and resource-recovery objectives and progressing towards net-zero emissions targets, with priority given to waste avoidance, reuse, recycling, and recovery outcomes consistent with circular-economy principles.

It is noted that Wollondilly Council's 2021 community survey regarding waste found that 67% of respondents supported EfW, with only 9% against, indicating some community support.

Please feel free to contact our Regional Waste Coordinator Jeremy Manion by email at jeremy.manion@the-parks.nsw.gov.au or myself, Joanna Kubota, Executive Director of The Parks by email at joanna.kubota@the-parks.nsw.gov.au should you have any questions.

Yours sincerely,

Joanna Kubota
Executive Director
The Parks, Sydney's Parkland Councils