Submission No 148

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Organisation: Hornsby Shire Council

Date Received: 26 October 2025

24 October 2025

NSW LEGISLATIVE COUNCIL
SELECT COMMITTEE ON PROPOSED ENERGY FROM WASTE FACILITIES
Via Online portal: Lodge a Submission

Attention – Select Committee

Hornsby Shire Council Submission to - Inquiry into Proposed Energy from Waste Facilities

Hornsby Shire Council (HSC) welcomes the opportunity to provide a submission to the Inquiry into Proposed Energy from Waste (EfW) Facilities.

This submission will address all elements of the Terms Of Reference, apart from (g) impacts of waste-dumping over a number of decades in the Tarago region, as we have no knowledge of that issue.

Previously, Council has provided extensive feedback to the NSW Environment Protection Authority on energy from waste in the context of the Draft NSW Waste and Circular Infrastructure Plan (Refer to Attachment 1).

The NSW Government is responsible for ensuring that infrastructure and waste services are strategically planned state-wide, now with Sydney Metro local councils and the private sector developing and operating this critical waste management infrastructure – noting the NSW Government has previously had a major direct role in waste infrastructure development and delivery for Sydney metro through the now sold assets and business of Waste Services NSW.

As Sydney Metropolitan Area with a population of approximately 5.5M people, represents over 60% of the NSW 8.5M population, and the city environment is highly constrained to locate critical waste treatment and disposal infrastructure, with over 30 local councils delivering waste services to residential communities, it is highly questionable if such fragmented management will be pragmatically capable of delivering on the required critical waste infrastructure Sydney must have within the tight timeframe of the next 5-7 years.

While we also welcome a new opportunity for genuine interagency collaboration and look forward to the involvement of local government in significantly contributing to solutions that represent value for money services to our communities and which strive to meet the broader goals relating to emissions reduction and safe reuse of valuable resources, we also strongly suggest that perhaps it is time for a new Sydney Waste Authority model to directly deliver the critical waste infrastructure Sydney metro area must have to maintain waste services to residents and businesses, and to maintain a productive economy.

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Council also acknowledges and supports submissions to this Inquiry from Local Government NSW and the Northern Sydney Region of Councils.

Council acknowledges the current waste and recycling crisis and notes the following general context and suggested approaches:

- Growing waste generation levels continue to outstrip any growth in recycling and resource recovery rates, meaning waste disposal tonnages have and will continue to significantly increase, with an ongoing and long-term requirement for around 34-50% significant disposal capacity for the waste generated in NSW.
- Both putrescible and dry waste landfill disposal capacity has approximately 5 years remaining life, with new waste infrastructure development lead times ranging from 5-15 years depending on it being landfill or energy from waste, and whether viable sites have already been secured and dependant on community acceptance.
- The private sector alone, or Sydney local councils individually or under region of council groups, are not well positioned to develop major new landfill or energy from waste facilities in regional areas where these difficult to located facilities need to be accommodated. A centralised approach, with a single NSW Government agency leading critical waste infrastructure development, is more likely to be successful in delivering the critical infrastructure required in the highly constrained timeframes. Urgent leadership and a pragmatic approach is required to be activated now to avoid the current crisis worsening or being unnecessarily drawn out.
- There has not been adequate leadership, strategic or regulatory oversight activity to monitor available critical waste disposal capacity a major metropolitan city depends on, by way of monitoring the remaining available disposal capacity or remaining disposal asset life availability, compared to the rates of waste generation and disposal volumes, and the required timeframe to plan for and deliver new or replacement capacity. Such monitoring and planning systems must be put in place to avoid this problem arising yet again, as was the case in 1999-2000 when North Sydney experienced the same disposal capacity crisis (resulting in the development of the Woodlawn landfill as an emergency measure), and which is again on foot today in 2025.
- That there has been, and currently are, highly difficult and problematic planning, environmental and community acceptance pathways for waste infrastructure facilities development, particularly for critical landfill and energy from waste proposed developments – with a strong need for direct NSW Government intervention to overcome these challenges in the available tight timeframes.
- That a reliance on landfill disposal is not the key problem, but rather the fact that there has been no landfill development activity to replace consumed landfill capacity.
- That developing landfill and or energy from waste facilities within the Sydney metro area is not a realistic goal due to the highly urbanised environment and constrained availability of suitable sites, and there is a great deal of understandable resistance from regional areas to accept Sydney's waste.
- Promoting the need for proponents proposing waste infrastructure developments to gain social licence from the surrounding communities where these facilities are proposed is not realistic, as no community wants a new landfill or energy from waste facility to be located near their homes or community. NSW Government community engagement and general assistance is urgently required to assist clear the way for viable development pathways for critical essential waste infrastructure.
- It is highly likely that EfW plants to be developed will not be operationally available until well after 2035, and given transitioning away from landfill to EfW will be a major community acceptance issue, planning to rely on this transition represents a very high-risk approach for critical waste disposal for a major metropolitan city.

- Even if major EfW facilities proceed in NSW, it is highly likely that at least one major new landfill facility will also be required to provide “bridging capacity” until the EfW facilities are operational. It is strongly suggested this could be facilitated by the NSW government establishing a major scale putrescible landfill in one of the many open-cut coal mine voids in the Hunter near a suitable rail line.
- At present it appears that EfW will be located at Goulburn, Lithgow, Parks and Tomago only. The current Veolia Goulburn proposal does not provide any new additional disposal capacity needed. It is also questionable if an adequate rail line exists to move bulk tonnages out of Sydney to Lithgow, noting the proposed site appears highly suitable. It is strongly suggested that other old disused coal fired power stations, in the Central Coast, Lake Macquarie and Hunter Valley areas should also be considered for EfW facilities, as they have existing rail access and connections to the electricity grid.
- NSW Government policy signals are ambiguous and unclear regarding if the Government is banning new landfill development and requiring a mandatory transition to energy from waste to meet Sydney metro and or NSW disposal requirements. This is considered problematic and high risk, given the lack of community acceptance for such EfW facilities. If the NSW Government is actively banning future new landfills and has a policy to transition to energy from waste facilities, it must undertake a broad scale statewide community engagement campaign to explain, justify and gain community support for this critical EfW infrastructure. Such a mandatory transition is likely to be highly problematic for the extended regulatory area (outside Sydney metro area) where most councils operate their own low-cost landfills and would need to bulk up and long haul transfer their waste to EfW facilities at significant cost as this mandatory transition takes effect.
- There is a great deal of uncertainty regarding cost impacts on waste service delivery to NSW residents and businesses from the proposed energy from waste transition, and to date there has been little work to examine this. It is noted that municipal scale mega landfills are likely to cost $100-$400 million, compared to EfW facilities costing in the order of $0.750-$1.5 billion per facility and they are also likely to experience significant cost and time blowouts in the current construction climate, with significantly higher gate rates for customers delivering waste, compared to significantly lower cost landfill facilities. This has the potential to have a major cost increase impact on council’s domestic waste management charges to their residents, with the possibility that such waste charges increase well beyond the general rates charged, and similar impacts to the business community.
- EfW facilities costing between $0.750-$1.5 billion can only be developed by a few companies, consortiums and or investment funds, which is highly likely to greatly restrict and or concentrate market competition, and more importantly, result in future rapid waste disposal cost escalations resulting from a lack of market competition.
- At present it appears that waste sent to future EfW facilities for treatment will not attract the NSW POEO Act Section 88 Waste Levy and this needs to be confirmed in the POEO Act, as there is some concern that when there is a major shift from landfill to EfW disposal and NSW Government losers around $1 billion pa, that there may be a strong future incentive to apply the Waste Levy to EfW to prevent a major NSW Government budget revenue loss.
- If the NSW Government is not banning future landfill development, it is suggested that landfills and EfW technology be allowed to compete in the open market for Sydney’s disposal capacity to assist keep disposal costs in check with improved market competition.
- The NSW Government’s interventions to extend and or expand existing landfills, and potentially reopen closed landfills, to ensure Sydney metro area does not run out of available disposal capacity, should been seen as a temporary interim measure only, and efforts to develop new large scale significant disposal capacity needs to remain on a fast track approach with the utmost urgency and with strong NSW Government leadership and preferably direct intervention.
- If landfills are to remain part of Sydney’s and or NSW’s waste disposal system, it is suggested that increased regulatory standards for landfill gas extraction systems are developed in the NSW Landfill Environmental Management Guidelines to further minimise landfill GHG emissions. This should

include requirements for more intensive horizontal and vertical methane recover pipes, and also that all landfills are required to have a minimum 1 metre plus organic compost interim and final bio-capping layer to ensure any fugitive methane emissions, not captured in the gas extraction system, are bio converted to carbon dioxide. This would also create valuable end markets for lower grade organic composts.

- There is no single NSW Government agency responsible to ensure Sydney metro area has the required critical essential service waste infrastructure a city of over 5 million requires. Perhaps it is timely for the NSW Government to consider establishing a "Sydney Waste Authority" to directly acquire waste infrastructure land, undertake waste infrastructure development and facilitate ongoing operations, while offering disposal services to NSW councils.
- While new EfW facilities will be required to meet current air pollution and emission regulatory standards, these facilities will still result in low level pollution of many forever chemicals that are likely to bioaccumulate within the environment and surrounding communities over the longer term. At present there is not a sound understanding of these potential impacts and communities faced with the possibility of an EfW facility being located nearby have genuine concerns.

Our overarching recommendations are:

1) Council recognises the inquiry is primarily focussed on the two proposed EfW facilities at Tarago and Pakes. However, the establishment of any EfW facilities in NSW must be done within a well thought out integrated waste management infrastructure plan. A detailed, strategic and cohesive long-term framework is required to address the current critical lack of waste disposal and processing infrastructure and capacity in NSW and particularly the Sydney Metro region.

2) Local government has a crucial role to play in providing an on-ground perspective of the day-to-day needs of collecting and processing waste and recyclable materials and should be consulted in the NSW Government interagency working group on waste infrastructure.

3) Infrastructure should be planned for with the detail and rigor that presently accompanies, roads, power and sewerage. It requires collaboration across all relevant NSW government agencies, particularly including DPHI. HSC seeks to better understand how holistic government input is being led and driven in conjunction with industry and local government.

4) Waste management services to Sydney, a city of over 5 million people, should be considered as an 'essential service' and receive adequate attention, planning, investment and development from the NSW State Government, in partnership with Local Government and the private sector.

5) Establishing the required social licence for EFW facilities represents a significant challenge. It does not currently exist with opposition from communities to all proposed EfW facilities in NSW, including Parkes, Goulburn and Lithgow. Stronger, coordinated leadership from all parties including the NSW Government, industry and local communities is required. Additionally, to date there does not appear to have been any EFW financial impact modelling undertaken to demonstrate the cost impacts on transitioning away from landfill to EFW on councils and the community which is recommended to be undertaken and published.

6) HSC considers that if we are unable to establish the social licence and EFW facilities are not operational by 2030-35, then what are our options for essential disposal facilities, and the community needs to share in this challenge as well to better understand the consequences should we not move to a greater reliance on EFW as a residual treatment. Should we be considering the development of one or more major mega landfills in the Hunter within an open cut coal mine void, with a well-

planned network of local transfer stations and a major waste bulking rail head facility to move waste northwards from Sydney. This, whilst in no way a desirable outcome may need to be investigated to provide an achievable, cost-effective long-term waste solution for Sydney.

7) Without adequate safeguards, EfW could displace more sustainable outcomes and compromise council-led zero-waste initiatives. To ensure EfW contributes positively, the Plan must provide clear policy direction, robust criteria, and assurance that EfW is positioned appropriately within the broader waste and resource recovery strategy.

8) NSW state government should ensure that at least 50% of Waste Levy Funds collected are allocated to direct waste infrastructure investment and development. Council believes that more innovative incentive-based solutions that could involve discount or exemption to the waste levy will encourage innovation from local government and the sector.

9) The NSW State Government should develop a well-planned and strategically geo-located integrated waste infrastructure network for Sydney that minimises transport costs and the number of waste vehicles on our roads.

10) Urgent NSW Government direct intervention is required to:

    a. Fast track the acquisition, securing and protection of suitable land for waste infrastructure development
    b. Provide leadership and assistance to gain the required social licence for community acceptance of essential waste infrastructure
    c. Fast track planning and environmental approvals for new or expanded waste management facilities within Sydney and or surrounding regions with feasible transit distances
    d. Create difficult to locate industry precincts
    e. Drive value for money services for our communities

Please feel free to contact Chris Horsey, Manager Waste Management, on or if you have any specific questions. We would also be pleased to elaborate

Yours sincerely

Chris Horsey
Manager, Waste Management

TRIM Ref: F2004/08805

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RESPONSE TO TERMS OF REFERENCE

(a) the performance of the technologies proposed for the Tarago and Parkes Energy Recovery Facilities as compared to leading thermal technologies employed in "state of the art" facilities internationally, noting such technologies as proposed are not employed anywhere else on the Eastern seaboard

- Council recognises the inquiry is primarily focussed on the two proposed EfW facilities at Tarago and Pakes. However, the establishment of any EfW facilities in NSW must be done within a well thought out integrated waste management infrastructure plan to ensure they are properly geo-located to the main waste generation areas to minimise transportation impacts and costs. A detailed, strategic and cohesive long-term framework is required to address the current critical lack of waste disposal and processing infrastructure in NSW and particularly the Sydney Metro region.

- Establishing the required social licence for EFW facilities represents a significant challenge. To date it does not currently exist with strong opposition from communities to all proposed EfW facilities in NSW, including Parkes, Goulburn and Lithgow. Stronger, coordinated leadership from all parties including the NSW Government, industry and local communities is required. Additionally, to date there does not appear to have been any EFW financial impact modelling undertaken to demonstrate the cost impacts on transitioning away from landfill disposal to EFW on councils and the community which is recommended to be undertaken and published.

- It is unclear if the Woodlawn, Parkes, Lithgow or Casino EFW facilities will be accepted by the NSW community. While EFW facilities may be able to demonstrate they meet modern emissions standards of the day, the community is still concerned and unaccepting of the long-term pollution risks created by low level toxins (e.g. various dioxins, other forever chemicals and the like) that are emitted and can bioaccumulate in our communities under long term plant operations. A NSW Government lead state wide campaign must address these concerns if a disposal technology transition to EFW is to be successful and community acceptance gained.

- It should also be made clear that energy from waste technologies will come at a greater cost to users (our communities) than new/additional landfill solutions.

- This campaign should also address the fact that Sydney's waste cannot be disposed of (regardless of landfill or EFW approach) in the Sydney catchment, as there isn't adequate space or suitable sites available, and that waste disposal facilities will be located outside of Sydney in regional areas at suitable sites.

(b) the spread of the emissions predicted and the quality of emissions to be generated

- Council supports the NSROC proposal develop transparent emissions modelling and third-party witnessed testing in any new facilities that become operational.
- Rural communities are concerned and suspicious of new waste related processing technologies for Sydney's waste being located in their local area. The fact that EfW technologies were deemed unsuitable for the Sydney air quality basin, but suitable for regional areas, has caused strong community objections where regional residents are feeling like second class citizens having to be impacted on by Sydney's waste disposal pollution impacts.
- Developing trust that the government and EfW proponents will be transparent on all potential emissions and pollutions resulting from new facilities is a basic requirement of gaining social licence. A significant part of the community's concern relates to long-term low-level pollution of a range forever chemicals such as dioxins and their build up with in the local environment. Given putrescible

waste from residents red bins and business waste, contains a broad variety of items like chemicals, batteries, plastics and the like, it is difficult to understand that there will not be long-term low-level pollution, that down the track may cause environmental and or human harm despite having met the regulatory pollution standards of the day. These concerns need to be adequately addressed.

(c) health impacts from currently operating older technology waste incinerators as compared to the proposed newer technology

- All comparisons should be like for like with other modern waste to energy facilities

(d) impacts on human health including on regional town drinking water, rainwater harvesting and soil contamination

- Regional communities are rightly concerned that processing waste from Sydney may lead to adverse consequences on water and soil and resent these possibilities. Leading practice emissions monitoring and concurrent testing regimes for drinking water, harvested rainwater and all potentially polluted soils must be consistent, comprehensive and readily available for scrutinising from affected communities. Residents within certain distances from EfW facilities are also likely to have concerns regarding the ingress of pollutants within their dwellings on a long term basis.

- Comprehensive testing for the purposes of comparison, must be undertaken before, during and regularly after the commissioning of any waste to energy facility.

- Independent robust human health risk assessments (HHRA) should be required.

(e) the impact on agriculture locally and across the wider region

- Local and regional agricultural land managers and producers have every right to be concerned about impacts on soil, air and water that may affect their production levels or the quality of food and fibre they produce.

- Our farmers pride themselves on having a ‘clean and green’ reputation – they need to be assured through a comprehensive and well documented scientific approach, that their natural resources remain unpolluted.

- Once again, rigorous and transparent emissions testing schemes may allay community concerns on this level.

(f) alterations to the Parkes Special Activation Precinct specifically in relation to the proposed Energy Recovery Facility in that region

- Any changes to the current SAP requirements should not compromise the need for rigorous environmental and social impact assessment, community engagement along with requirements for best practice environment/health protections in precinct plants.

(g) impacts of waste-dumping over a number of decades in the Tarago region

- No response

(h) the methodology of emission monitoring employed by leading large scale waste-to-energy facilities in Australia and across the world

- Strong, continuous and transparent monitoring and reporting is required to give councils and the broader community confidence in any emissions from these facilities.

(i) alternative solutions to reduce and manage residual waste produced by Greater Sydney, and

- EfW could lock councils into long-distance, costly long-term contracts, potentially undermining future recycling or circular economy initiatives

- A solution to this potential problem is to implement “waste-arising” contracts for councils, where councils commit residual waste left after recycling, not fixed volumes

(j) **any other related matters**.

- A bigger-picture waste and circular economy narrative for the communities of NSW remains absent from current NSW Environment Protection Authority documents and broader planning processes in NSW.

- Without this, the State will struggle to bring NSW communities onside with the bold waste management reforms needed to achieve State and Federal recovery targets.

- The Inquiry should recommend the NSW Government expedite release of the updated Chapter 1 along with subsequent Chapters of the NSW Waste and Circular Infrastructure Plan by the end of 2025.

- The Draft NSW Infrastructure and Circular Infrastructure Plan is without strategic context and lacks clarity on how it fits within a broader, long-term infrastructure framework, or how it contributes towards net zero and circular economy.

- It is acknowledged that many of the measures considered in Draft NSW Infrastructure and Circular Infrastructure Plan are interim measures. More clarity in short, medium and long-term measures to deal with the NSW infrastructure crisis is urgently required in coming chapters of The Plan. A far more comprehensive, detailed, strategic and cohesive long-term framework is required to address the current critical lack of waste disposal and processing infrastructure in NSW and particularly the Sydney Metro region.

Attachment 1

Hornsby Submission to: Draft NSW Waste and Circular Infrastructure Plan

Submission - Draft NSW Infrastructure and Circular Infrastructure Plan

Hornsby Shire Council (HSC) welcomes the opportunity to provide feedback to NSW Government on the recently released Chapter 1 of the Draft NSW Waste and Infrastructure Plan. Please see Council's recommendations below. These are also provided with additional detailed comments as part of the full HSC submission.

1. Many of the measures considered in this plan are interim measures. Council recommends more clarity in short, medium and long-term measures to deal with the NSW infrastructure crisis. A far more comprehensive, detailed, strategic and cohesive long-term framework is required to address the current critical lack of waste disposal and processing infrastructure in NSW and particularly the Sydney Metro region.
2. Local government has a crucial role to play in providing an on-ground perspective of the day-to-day needs of collecting and processing waste and recyclable materials. Local government participation is not adequately considered in the current stakeholder consultation or strategic collaborative processes that accompany it, such as the NSW Government interagency working group on waste infrastructure.
3. Infrastructure should be planned for with the detail and rigor that presently accompanies, roads, power and sewerage. It requires collaboration across all relevant NSW government agencies, particularly including DPHI.
4. Waste management services to Sydney, a city of over 5 million people, should be considered as an 'essential service' and receive adequate attention, planning, investment and development from the NSW State Government, in partnership with Local Government and the private sector.
5. It is Council's understanding that the required social licence does not currently exist with opposition from communities to all proposed EfW facilities in NSW, including Parkes, Goulburn and Lithgow. Stronger, co-ordinated leadership from all parties including the NSW Government, industry and local communities is required.
6. Given the lack of social licence and the projected costs of EfW, the NSW State Government should investigate the development of one or more major or landfills in the Hunter, with a well-planned network of local transfer stations and a major waste bulking rail head facility to move waste northwards. This would provide a more cost-effective long-term waste solution for Sydney.
7. All NSW transfer stations that were previously corporatised and then privatised during the sale of Waste Service NSW assets, should be handed back to local government, ROCs or corporations of local government entities. This should be facilitated by the NSW state government.
8. NSW state government should ensure that at least 50% of Waste Levy Funds collected are allocated to direct waste infrastructure investment and development
9. The NSW state government should develop a well-planned out and strategically geo-located integrated waste infrastructure network for Sydney that minimises transport costs and the number of waste vehicles on our roads.
10. Urgent NSW Government intervention is required to:
    a. Fast track the acquisition, securing and protection of suitable land for waste infrastructure development
    b. Provide assistance to gain the required social licence for community acceptance of essential waste infrastructure
    c. Fast track planning and environmental approvals for new or expanded waste management facilities within Sydney and or surrounding regions with feasible transit distances
    d. Create difficult to locate industry precincts

Hornsby Shire Council – Submission responding to:
Draft NSW Waste and Circular Infrastructure Plan
June 2025

Summary

Hornsby Shire Council (HSC) welcomes the opportunity to provide feedback to NSW Government on the recently released Chapter 1 of the Draft NSW Waste and Infrastructure Plan (The Plan).

Our submission will be structured in four parts:

1. Recommendations
2. Initial comments and general feedback
3. Responses to the Plan's Themes
4. Detailed comments

Section 1

Recommendations

1. A bigger-picture waste and circular economy narrative for the communities of NSW remains absent. Without this, the State will struggle to bring NSW communities onside with the bold waste management reforms needed, if we are to achieve State and federal recovery targets. The Plan is without strategic context and lacks clarity on how it fits within a broader, long-term infrastructure framework, or how it contributes towards net zero and circular economy. The Plan is described as "Chapter 1," but only two other chapters are mentioned on page 10 (regional challenges and supporting recycling and reuse infrastructure.) Without knowing other focus areas, or how Chapter 1 connects to later chapters, stakeholders can't understand the overarching direction, intent, or alignment with other State strategies.

2. It is acknowledged that many of the measures considered in this plan are interim measures. More clarity in short, medium and long-term measures to deal with the NSW infrastructure crisis is urgently required in coming chapters of The Plan. A far more comprehensive, detailed, strategic and cohesive long-term framework is required to address the current critical lack of waste disposal and processing infrastructure in NSW and particularly the Sydney Metro region.

3. Local government has a crucial role to play in providing an on-ground perspective of the day-to-day needs of collecting and processing waste and recyclable materials. Whilst we consider that local govt feedback has been considered in the development of this draft, our crucial role in working with communities to understand the waste challenge, educate our communities on sustainable futures Local government participation is not adequately considered in the current stakeholder consultation or strategic collaborative processes that accompany it, such as the NSW Government interagency working group on waste infrastructure.

4. Infrastructure should be planned for with the detail and rigor that presently accompanies, roads, power and sewerage. It requires collaboration across all relevant NSW government agencies, particularly including DPHI. HSC seeks to better understand how holistic government input is being led and driven in conjunction with industry and local government.

5. Waste management services to Sydney, a city of over 5 million people, should be considered as an 'essential service' and receive adequate attention, planning, investment and development from the NSW State Government, in partnership with Local Government and the private sector.

6. Establishing the required social licence for EFW facilities represents a significant challenge. It does not currently exist with opposition from communities to all proposed EfW facilities in NSW, including Parkes, Goulburn and Lithgow. Stronger, co-ordinated leadership from all parties including the NSW Government, industry and local communities is required.

7. HSC considers that if we are unable to establish the social licence then what are our options and the community needs to share in this challenge as well to better understand the consequences should we not move to a greater reliance on EFW as a residual treatment. Should we be considering the development of one or more major or landfills in the Hunter, with a well-planned network of local transfer stations and a major waste bulking rail head facility to move waste northwards. This, whilst in no way a desirable outcome may need to be investigated to provide an achievable, cost-effective long-term waste solution for Sydney.

8. All of the NSW transfer stations in the Sydney metropolitan area were previously corporatised and then privatised during the sale of Waste Service NSW assets. Whilst the injection of private sector capital has undoubtedly provided benefits to the economy there have been unfortunate consequences which in the view of Council have effectively reduced competition and increased costs to communities whereby additional travel costs have added to the expense of delivering waste services. Innovative solutions are required to address these issues.

9. NSW state government should ensure that at least 50% of Waste Levy Funds collected are allocated to direct waste infrastructure investment and development. Council believes that more innovative incentive-based solutions that could involve discount or exemption to the waste levy will encourage innovation from local government and the sector. Waste avoidance needs further consideration and development

10. The NSW state government should develop a well-planned out and strategically geo-located integrated waste infrastructure network for Sydney that minimises transport costs and the number of waste vehicles on our roads.

11. Urgent NSW Government attention to the following chapters is required including possible direct intervention to intervention is required to:
    a. Fast track the acquisition, securing and protection of suitable land for waste infrastructure development
    b. Provide leadership and assistance to gain the required social licence for community acceptance of essential waste infrastructure
    c. Fast track planning and environmental approvals for new or expanded waste management facilities within Sydney and or surrounding regions with feasible transit distances
    d. Create difficult to locate industry precincts
    e. Drive value for money services for our communities

Section 2

2a - Initial comments

Chapter 1 of The Plan, while addressing some initial short-term actions needs to be part of a much more comprehensive, detailed, strategic and cohesive long-term framework to address the current critical lack of waste disposal and processing infrastructure in NSW, particularly Sydney Metro which is acutely impacted.

Chapter 1 refers to future waste infrastructure detailed planning activities, however local government and the waste sector in general, has been waiting on this Plan's development to provide not only the required waste infrastructure strategic leadership, but more importantly specific details on what waste infrastructure is needed, where it needs to be located and how its development will be facilitated within the very tight timeframes remaining before significant capacity issues are critical.

The NSW Government cannot rely on individual councils, joint procurements between local councils or the private sector to facilitate the development of critical waste infrastructure that Sydney Metro Area requires, as the scope of the required infrastructure development is not compatible with these existing processes. NSW State Government intervention is required.

It is unclear what subsequent Chapters will be released or their timeframes, however Hornsby Shire Council notes the critical importance of the NSW Government moving at speed to avoid a situation where Sydney does not have disposal capacity and waste has nowhere to go.

Circularity goes well beyond collection, disposal and processing. Innovation in the design and development elements of new products and materials must be supported as well as the development of end markets for these materials. The combined procurement power of all levels of government can play a critical role in market development.

While circular waste infrastructure is very important and part of the required structural changes needed to establish onshore secondary waste processing, it is strongly suggested that circular waste infrastructure planning is separated out from this essential waste infrastructure plan, that must focus on and deliver the required solutions to ensure that Sydney's basic waste services can continue to function.

Waste is an essential infrastructure service to 128 local government communities across NSW. As such, it should be planned for with the detail and rigor that presently accompanies, roads, power and sewerage.

Waste management services to Sydney, a city of over 5 million people, should be considered as an "essential service" and receive adequate attention, planning, investment and development from the NSW State Government, in partnership with Local Government and the private sector.

Local government has a crucial role to play in providing an on-ground perspective of the day-to-day needs of collecting and processing waste and recyclable materials and is not adequately considered in The Plan or any of the stakeholder consultation and or strategic collaborative processes that accompany it.

Individual councils across Greater Sydney are not in a position to undertake the required regional planning activities or to directly facilitate waste infrastructure development based on an integrated network of waste facilities covering:

- accessible and strategically located transfer stations to bulk up and move putrescible and dry waste/organics,
- rail-head transport nodes (intermodals) to load wastes for long haul transport to regional area processing or disposal facilities,
- organics processing facilities for separated garden organics and mixed food and garden organics,
- dry waste landfills,
- putrescible waste landfills,
- energy from waste facilities and
- localised collection fleet depots servicing one or more LGAs,

1b - General Feedback:

Landfills/Energy from Waste Facilities

- The Plan should acknowledge that waste generation is increasing, and resource recovery growth is not keeping pace with generation growth, meaning for the foreseeable future, waste disposal is likely to be maintained around 50% and our communities must have access to adequate and reliable disposal capacity as a pragmatic need for essential waste services.
- Chapter 1's plan to extend and augment existing putrescible and dry waste landfills is a very positive and greatly needed to provide interim waste disposal capacity to avoid a situation where Sydney runs out of adequate disposal capacity.
- A focus must be maintained on both putrescible and dry waste landfills, as restricted disposal capacity is already being felt by local councils by way of limited disposal options and rapidly escalating gate rates for both waste types.
- This extension and augmentation of exiting landfills approach will only provide interim capacity and does not address the fundamental long term capacity needs of Sydney.
- New landfill development across the state has stagnated and as landfill capacity is constantly being consumed, replacement landfill assets taking 5-10 years to establish, must urgently be permitted to be planned, approved and developed.
- There needs to be clear leadership from the NSW Government on its preferred waste disposal approach. That is, if the NSW Government wants to phase out landfills as the primary disposal option, and facilitate a transition to Energy from Waste facilities as the replaced preferred disposal approach/technology, then the NSW Government must undertaking broad scale and extended community engagement and communication campaigns to let the NSW community know of such a policy shift, the reasons why, the benefits, and to gain the broad social licence that is required to allow this to occur.
- To date (i.e. the last 25 years) the NSW community has not shown an acceptance of energy from waste or incineration technologies for fears related to air pollution and not wanting to see Sydney's waste transported to regional areas for incineration.
- It is unclear if the Woodlawn, Parkes, Lithgow or Casino EFW facilities will be accepted by the NSW community. While EFW facilities may be able to demonstrate they meet modern emissions standards, the community is still concerned and unaccepting of the long-term pollution risks created by low level toxins (e.g. various dioxins and the like) that are emitted and can bioaccumulate in our communities under long term plant operations. A NSW Government lead campaign must address these concerns if a disposal technology transition to EFW is to be successful and community acceptance gained.
- It should also be made clear that energy from waste technologies will come at a greater cost to users (our communities) than new/additional landfill solutions.
- This campaign should also address the fact that Sydney's waste cannot be disposed of (regardless of landfill or EFW approach) in the Sydney catchment, as there isn't adequate space or suitable sites available, and that waste disposal facilities will be located outside of Sydney in regional areas at suitable sites.
- Further to this, adopting a more pragmatic approach than the current EFW Policy or this Chapter 1 is needed by way of asking the simple question - where is the best place to locate EFW facilities in NSW? It seems clear that closing or closed coal fired power station sites would be a logical and compatible land use choice. The NSW Government should be facilitating such an approach rather than relying on the private sector to go it alone at the risk of failure and the state being walked into a serios disposal capacity crisis that will not have a quick fix.
- If the NSW Government wants to remain agnostic on its preferred disposal approach, then it needs to NOT restrict the development of new major landfill developments and statements such as "new

landfills are a last resort option" should be removed from the chapter as it sends a confused message.

- On that subject, it is noted that around 25 years or so ago, north Sydney had a similar waste disposal capacity crisis that gave rise to the NSW Government assisted establishment of Woodlawn landfill being developed. To waste sector professionals, we are unfortunately back at this point again, and NSW State Government intervention is not only needed, but is critical.
- It is strongly suggested that with the pending closure of a number of Hunter open cut coal mines, and the many disused voids at active mines, again the pragmatic question of where a new cost-efficient landfill for Sydney could be located, gives rise to the answer as the Hunter being the most logical option.
- Moving waste into the Hunter, either for landfill and or EFW disposal, will need a further major rail-head waste bulking transfer station (intermodal) to be established within Sydney. The Waste Infrastructure Plan needs to specifically address this need and undertake detailed site analysis to identify suitable intermodal facility locations that facilitate waste movement into the Hunter. Further to this, it is strongly suggested that the NSW Government could assist with suitable site land acquisition, site development, and non-private sector site administration, all using Waste Levy funds, to provide timely solutions to the waste infrastructure crisis.
- Given the landfill capacity crisis on our doorstep and that fact there is no time to waste, such strong leadership needs to be brought forward by the NSW Government urgently. The NSW Government cannot sit on the sidelines wanting to rely on local councils and or the private sector to solve this waste infrastructure crisis, as when the crisis develops to the stage that councils, local businesses and the waste sector do not have disposal capacity, it will become a State Government matter to resolve without the required available time to do so. Now is the time to act with some decisiveness to avoid the crisis severely impacting all stakeholders.
- Hornsby Shire Council is also concerned that transitioning to EFW will significantly increase local councils cost structure for domestic waste services (and also for business waste disposal), adding additional and avoidable cost of living pressures on our community.
- To that end, it is of interest to ask if the NSW Government has undertaken any cost benefit or other financial analysis that may examine this matter to allay such concerns.
- If EFW will significantly increase these cost structures, is it that developing one or more major or landfills in the Hunter, with a well-planned network of local transfer stations and a major waste bulking rail head facility to move waste north-wards, would provide a more cost effective long-term waste solution for Sydney.
- There are also concerns regarding trying to send additional quantities of waste south bound on the rail network, as Veolia have repeatedly stated there is no more rail capacity to increase the existing tonnage moving south. To that issue, it may be strategically prudent for Sydney to also have a northern rail line approach, to allow for increased rail volumes, and to add more resilience to Sydney's waste systems.
- Critical decisions need to be made in the next 6 months regarding pursuing either EFW facilities or a new major landfill for Sydney, to enable the next 4-5 years for such facilities to be developed. We cannot afford to take another 2-4 years before a clear and decisive position is taken. An action orientated plan needs to be developed demonstrating the key actions and timeframes to deliver this critical waste disposal infrastructure for Sydney so all stakeholders have the confidence there is an achievable plan in place. NSW Government intervention, and drive must be provided.

Waste infrastructure ownership and operation

- The Plan's streamlined planning process, waste infrastructure concierge and establishing a NSW Government interagency working group for waste infrastructure are acknowledged positive initiatives.
- The Plan states that waste infrastructure in NSW is owned and operated by the private sector or local councils, and that it is the role of these parties to design and deliver waste infrastructure.
- Hornsby Shire Council takes issue with this statement and suggests this is not accurate. The NSW Government has in the past directly planned, designed, developed and operated most of Sydney Metros waste infrastructure, providing a well established and coordinated cost effective integrated network of waste infrastructure that Sydney relied upon.
- Given the current waste infrastructure crisis, and the severe lack of time to undertake what needs to be achieved, it may very well be that the NSW Government is best placed to again undertake essential waste infrastructure planning, design, development and operations, to avoid Sydney having a significant waste disposal crisis.

Chapter 1 Level of Detail

- Chapter 1 of the Plan lacks sufficient planning and details that are required to establish core waste infrastructure deficiencies and needs for Sydney Metro which represents 5 million people of NSW's 8 million population.
- Sydney Metro should have its own detailed essential waste infrastructure plan, noting councils in Sydney do not have their own land or access to land to develop waste facilities.
- There needs to be an analysis of existing waste infrastructure and specific gap infrastructure needs identified for Sydney Metro.
- For gap infrastructure that is required, as waste management involves transport logistics, it is critical that geo-location aspects of essential waste infrastructure are carefully planned.
- Individual local councils must be consulted to identify where critical waste infrastructure needs to be located so we have a cost-efficient waste system in Sydney.
- Hornsby Council recommends the NSW Government undertake a process to explore how the privatised waste transfer stations (E.g. Ryde and Seven Hills etc) can be put back into the hands of local councils or groups of local councils under ROCs or forming a corporatised model/group. Having these transfer station facilities administered by local councils would allow greatly improved access to these transfer stations and give councils better cost control of their waste services.
- It appears that numerous Sydney Metro councils will be implementing a separate FO and GO approach to meet the NSW Government's FOGO Mandate. As such, garden organics processing facilities are still required and open windrow composting facilities are much needed, particularly for north Sydney councils, with Kimbriki being the only accessible processor, and highly limited market competition.
- As an example, Hornsby Shire Council has identified a potential site that can be used for multiple waste facility purposes, including establishing a garden organics processing facility, and transfer station facilities for FO and bulky waste, and possibly putrescible waste. NSW Government intervention and assistance could be provided by way of resolving constraints under a land acquisition Deed from the State Government, fast tracking rezoning application, and importantly providing Waste Levy exemptions for a period of time to free up council domestic waste management funds for direct investment into critical waste infrastructure. Having the NSW Government directly supporting stakeholders that bring forwards waste infrastructure development projects is much needed to provide the waste infrastructure development at the pace to avoid the crisis.

- Alternatively, Hornsby Shire Council would like to see the establishment of additional open windrow garden waste composting operations established at the closed landfill sites of Eastern Creek and Veolia's Horsley Park Landfill facilities, to introduce more garden waste processing capacity and importantly to facilitate more market competition to assist reduce rapidly escalating gate rates.
- Further Chapters of this Waste Infrastructure Plan need to address the specific waste infrastructure needs of Sydney, detailing what specific infrastructure is needed and where it needs to be located to form a proper integrated waste infrastructure network that allows for waste to be collected from local residents and businesses, taken to strategically located networks of transfer stations, intermodals or directly to waste processing facilities. Such waste infrastructure needs to be equitably distributed across all regions of Sydney so that no council areas are disadvantages and pay disproportionately higher waste management costs.
- To date it is unclear if the NSW Government intends on undertaking the above referred detailed waste infrastructure planning that is critical to address the current lack of waste infrastructure problems.
- The NSW Government cannot simply rely on local council joint procurements, or private sector proponents, even with fast-track planning approaches, to solve the current waste infrastructure crisis issues in the very limited timeframes that are available.
- Establishing specific VENM/ENM disposal facilities is a very positive step to reduce pressures on existing landfills. This initiative could go further by way of – requiring all developments that excavation materials to test VENM/ENM characteristics (plasticity/pass sizes etc) so that if the material is useful for landfill interim or capping material, it can be easily identified and beneficially diverted for these purposes. Where VENM/ENM needs to be disposed of, it is suggested that again a pragmatic approach be facilitated, where old quarry voids in Sydney (and elsewhere) are identified to be used as disposal locations. Or even better reverse borrow pits, where material is deposited, stored and potentially reclaimed when fill materials are required on major civil projects. This approach was successfully implemented in Canberra to divert VENM/ENM away from Mugga Lane putrescible landfill, to a newly established VENM/ENM borrow pit at the old disused Mugga Lane Quarry.
- Protecting existing waste facilities from urban encroachment and managing threats to close essential waste facilities is a positive action under Chapter 1. However, more details on how this is proposed to occur would be useful to provide the required assurances.
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Section 3 - Responses to the Plan's Themes and questions contained in the online survey

Theme 1: Streamlining planning processes to fast-track expansion of existing landfills

How strongly do you agree or disagree with the following proposed actions?

- Establish a streamlined planning pathway for modifications to priority existing landfills
- Rapidly assess proposed modifications to existing priority landfills
- Consider reopening closed landfills to unlock waste capacity for red lidded bins
- Establish a waste infrastructure concierge to provide planning advice and support to applicants
- Investigate alleviating pressures on existing landfills by diverting Virgin Excavated Natural Material and Excavated Natural Material from disposal and storing them for future reuse

HSC agrees in principle to all of these statements.
Being a northern Sydney Council, we have a strong view that new landfills or EFW should be considered in the Hunter region, utilising the numerous existing mining voids or coal fired power stations.

Theme 2: Building resilience by enabling planning for energy from waste

How strongly do you agree or disagree with the following statements?

- Energy from waste can build the resilience of our waste management system
- Energy from waste can reduce our reliance on landfills
- What are your thoughts on this theme?

It is Council's understanding that the required social licence does not currently exist with opposition from communities to all proposed EfW facilities in NSW, including Parkes, Goulburn and Lithgow. Stronger, co-ordinated leadership from all parties including the NSW Government, industry and local communities is required. EfW faces a long, hard pathway to community acceptance and may pose cost exposure significantly greater than landfilling.

EfW could be a viable alternative as a primary processing method for residual waste once high value recyclables have been stripped from that stream. However, given the comparative costs of developing landfill sites versus EfW sites are approximately $200 million compared to $1.5 billion, EfW would significantly drive up the costs for disposal to local government and its ratepayers. As part of finalising a waste infrastructure plan, an important head of consideration should be the cost to communities and ultimately capacity to pay.

HSC would be very concerned if EfW's elevated cost structure had to be recovered as part of disposal costs in the Domestic Waste Management Charge (DWMC) which are already imposing a significant burden on local communities.

Although landfilling poses risks in terms of localised land and water pollution, these may be preferable to decreased air quality that impacts on a much larger area by the community. EfW will have long-term low-level high-toxicity air pollutants and particulates that can contaminate soils, houses etc and bioaccumulate in humans and animals.

Theme 3: Strategic planning to meet the waste management needs of growth populations

How strongly do you agree or disagree with the following proposed actions?

- Establish lead NSW Government agencies for strategic waste planning – agreed.
- Establish an accelerated planning pathway for new priority waste infrastructure – agreed.
- Plan for long-term waste infrastructure needs – agreed.
- Facilitate transfer station upgrades – agreed, but local government must see the details and be consulted – see below.
- Clarify planning assessment requirements and update the assessment pathways for waste infrastructure – agreed.
- Enhance the strategic protection of new and existing waste infrastructure assets – agreed.
- Enable Local Government's strategic planning – Strongly agreed.
- What are your thoughts on these actions? Are there any potential benefits or risks you'd like to raise?

The HSC perspective is that we would like to see all the NSW transfer stations that were previously corporatised and then privatised during the sale of Waste Service NSW assets, to be handed back to local government ROCs or corporations of local government entities. This should be facilitated by the NSW state government.

Section 4 - Other detailed comments

The Waste and Circular Infrastructure Plan must specifically address the needs of Greater Sydney Region, with over 5 million of the state's 8 million population. The plan must incorporate a detailed geo-specific waste plan for greater Sydney. This should incorporate planning for railheads, transfer stations and analyse gaps in current and planned infrastructure. For example, a new Sydney metro/north Sydney major rail head waste bulky and transfer station that has capacity to move large volumes north to the Hunter – possibly in Cowan.

This Plan must examine or involve:

- Extensive consultation with and participation from local councils within the area the Plan applies to. The Plan must be far more detailed than capacity and gap assessments. It must look at what facilities are required and where they need to be located. To date we don't think this level of consultation or participation has been undertaken by the NSW EPA

- Existing waste assets and extending their useful life through urgent augmentation and expansion works is a much-needed interim measure only. However, it will only serve a short period and longer-term waste infrastructure is still required.
- How councils can get better access to existing transfer stations, particularly where waste needs to be moved to facilities owned by others. This could involve negotiated facility buy backs from local councils or groups of councils.
- A well-planned out and strategically geo-located integrated waste infrastructure network for Sydney that minimises transport costs and the number of waste vehicles on our roads
- A state government established fast-track planning and environmental approval pathways for essential and critical waste infrastructure development
- To establish difficult to locate industry precincts within Sydney and to acknowledge the employment opportunities these facilities will bring. We also need to protect existing waste facilities from urban encroachment and pressure to relocate to regional or rural areas
- State government assistance to ensure community understanding and acceptance of the need to locate waste facilities as simply relying on proponents to gain a "social licence" from local residents to site a waste facility near them has proven to be very difficult.
- The state government should facilitate a process where councils directly investing in waste infrastructure have 50-100% reduced upfront waste levy payment obligations, with the released funding to be spent on agreed infrastructure projects.
- Urgently address the current waste infrastructure crisis facing Greater Sydney before it is too late to plan and develop this essential infrastructure a city requires.
- Undertake what would normally take ten years and this will require state government intervention and assistance, or we risk rubbish piling up on our streets around 2030.

It will be critical for the NSW Government to undertake appropriate Sydney Metropolitan Area waste infrastructure planning, investment and development, that facilitates key waste management assets including:

- A network of transfer station hubs at strategically located sites across Sydney Metropolitan Area, that allows local collection vehicles to operate in a cost-efficient manner and reduces traffic on our roads and GHG emissions
- Adequate organics processing facilities for garden organics and food organics to support the NSW Government's 2030 Food Organics and Garden Organics (FOGO) Mandate, noting there is a major organics processing capacity shortfall at present
- Critical landfill capacity, for both putrescible and dry waste landfills currently receiving over 50% of Sydney's waste, must be facilitated by allowing the expansion of existing landfill facilities and or the urgent creation of new landfills
- An urgent review of the NSW Government's Energy from Waste (EfW) Policy that currently restricts the locations where EfW facilities are permitted – noting Lithgow and Hunter areas are highly suitable for EfW
- Ensuring at least 50% of Waste Levy Funds (a state tax to discourage landfilling waste) collected by the NSW Government are returned for direct waste infrastructure investment and development
- Council also notes the FOGO Mandate utilised by the NSW Government as a key non-financial legislated lever to facilitate the required changes sought by Government policy. Given the current acute cost of living crisis our community faces, Council calls on the NSW Government to look to phase out this Waste Levy approach and establish further similar legislated changes such as requiring all waste to be pre-processed to extract recyclables prior to being permitted to be

disposed of in landfill or EFW. The savings this would deliver to local councils could be used to provide improved waste services at no cost to our community.

Urgent NSW Government intervention is required to:

- Fast track the acquisition, securing and protection of suitable land for waste infrastructure development
- Provide assistance to gain the required social licence for community acceptance of essential waste infrastructure
- Fast track planning and environmental approvals for new or expanded waste management facilities within Sydney and or surrounding regions with feasible transit distances
- Create difficult to locate industry precincts

Future of the Waste Levy

HSC proposes that the NSW Government should abolish the Waste Levy by 2030 as it is unnecessarily economic blunt instrument that is driving up waste management costs to residents and businesses at a time when communities cannot afford it and recommend an urgent transition to a legislative approach where identified waste streams and materials are mandated to be recycled rather than disposed on to landfill or EfW.

Additionally, that between 2026-2030 all Waste Levy funds collected by the NSW Government be set aside in a Government Reserve Fund for high priority essential waste infrastructure development projects.

HSC recommends that the state government supports opportunities for groupings of Sydney/Hunter councils that may like to form a LG Corporation or similar entity and enter into a PPP or similar with an open cut coal mine owner/company to establish a new extended term (>50 years) mega landfill in the upper Hunter as a more cost-effective waste disposal option than EfW.