Submission No 190

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Organisation: City of Sydney

Date Received: 29 October 2025

CITY OF SYDNEY

City of Sydney
Gadigal Country
456 Kent Street
Sydney NSW 2000

29 October 2025

Our Ref: 2025/623647
File No: X009813.001

The Director
Select Committee on Proposed Energy from Waste Facilities
Parliament House
By email: WasteEnergy@parliament.nsw.gov.au

Dear Committee Secretary,

Select Committee on Proposed Energy from Waste Facilities - City of Sydney submission

I refer to the request from the NSW Legislative Council's Select Committee to provide a submission to the inquiry on proposed energy from waste facilities.

The City of Sydney (the City) welcomes the opportunity to provide a submission to the NSW Select Committee inquiry into proposed energy from waste (EfW) facilities. While the City of Sydney is not a proprietor of energy from waste technology nor a health institution and therefore not qualified to respond to many of the terms of reference for this inquiry, we are a local government responsible for collecting and managing waste and recycling from more than 200,000 residents. As local government we are required to secure long term contracts for the sustainable management of waste and recycling is a key priority.

Although we have ambitious waste reduction and recycling targets, we will continue to require services to manage residual waste and believe that demand will remain for at least the next decade or more as our city grows. We have concerns that with the current rate of approvals for new facilities taking more than 1.5 years for recycling and up to 10 years for residual treatment, demand for capacity will drive costs for community even higher[1].

This submission draws on the City's previous responses to the NSW EPA's Energy from Waste Options Paper (April 2025) and the Draft NSW Waste and Circular Infrastructure Plan (June 2025)

1. EfW should not be considered in isolation but alongside other residual waste treatment

The City has consistently advocated that EfW should only be considered after all higher-order waste hierarchy options (avoidance, reuse, repair, and recycling) have been exhausted and as part of an integrated waste and materials management strategy.

[1] Industry article

Notwithstanding the above and despite the sustained efforts of local and state governments to reduce waste and increase recycling, more than 7 million tonnes of waste were disposed of in landfill in 2023/24. This disposal amount has been relatively stable since 2017/18[2]. As a result, in November 2024 our NSW Environment Minister announced at a Circular Economy Summit in Sydney that without action NSW landfill capacity could be exhausted within 10 years[3].

With the critical and sustained need for residual treatment processing in NSW we strongly urge that decisions regarding EfW proposals should not be considered in isolation, but alongside the environmental, social and economic impacts and likelihood of expanding existing and creating new landfill, currently our only alternative for managing residual waste.

2. Energy from waste should be considered as part of an integrated infrastructure planning framework

The City acknowledges the rationale for the development of precinct-based waste infrastructure as presented in the 2021 NSW Energy from Waste Infrastructure Plan[4] for the development of new facilities. We note however that the original precincts identified in the Plan have failed to progress and of the original 4 locations identified one has been removed by the NSW Government (West Lithgow), and Richmond Valley Council announced in 2023 that they had no intention to develop a facility and were not aware of any other proponents in the region[5].

The protracted development progress for energy from waste facilities suggests a need to revisit the current approach and consider a more principles-based approach to waste infrastructure planning and site selection. Consideration of energy from waste should form part of an integrated statewide plan to accommodate long-term waste infrastructure needs. Planning for residual treatment alongside, rather than in isolation to, recycling and resource recovery infrastructure is vital to demonstrate NSW Government's commitment to achieving its circular economy goals.

3. Meaningful and enhanced community engagement is required to allow for the development of necessary waste infrastructure

It is essential that the community understands waste management is a shared responsibility. Without accessible infrastructure and meaningful changes in behaviour, particularly around increased reuse and recycling, the need for more residual waste treatment capacity will continue to rise.

While the City supports the application of the precautionary principle in siting EfW facilities, particularly in areas with existing air quality concerns, the current policy framework appears inconsistent with EfW being described as both a necessary solution and a prohibited activity, depending on location. This ambiguity risks undermining public confidence.

The NSW Government as a regulator and trusted source of information[6] needs to provide simple, clear and non-technical information for our communities to better

---

[2] https://www.epa.nsw.gov.au/Your-environment/Waste/waste-overview/waste-performance-data
[3] https://www.nsw.gov.au/media-releases/minns-labor-government-taking-action-so-sydney-doesnt-run-out-of-landfill
[4] https://www.epa.nsw.gov.au/sites/default/files/21p3261-energy-from-waste-infrastructure-plan.pdf
[5] https://richmondvalley.nsw.gov.au/no-energy-from-waste-facility-proposed-for-richmond-valley/
[6] https://www.epa.nsw.gov.au/sites/default/files/23p4454-strategic-plan.pdf

understand how waste processing facilities operate, how emissions and other materials left over from the process can be safely managed, and how these facilities compare to emissions from other processes such as landfill. There must be a process for allowing meaningful and robust consultation about waste and how it should be managed. It is also unclear as to why, in the case of EfW the NSW Government is seeking to limit the number of facilities being developed while, noting that the same development restrictions are not applied to new and expanding landfills.

4. Regulatory consistency in development of planning and emissions standards for all similar industrial facilities

The City queries NSW Government approach to limit the geographic application of EfW while simultaneously acknowledging its safe and effective use globally and elsewhere in Australia.

Additionally, the assertion that NSW will apply more stringent emissions standards than those used successfully in the European Union and in WA potentially creates an unworkable regulatory environment. These limitations also contribute to public misconceptions about EfW safety. We urge the NSW Government to provide clear, science-based justification for these limits and to consider aligning with best-practice international standards and other similar industrial processes.

Should you wish to speak with a Council officer about this response, please contact Gemma Dawson, Manager Waste and Circular Strategy on or at

Yours sincerely

Monica Barone PSM
Chief Executive Officer