Submission
No 221

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Organisation: Local Government NSW (LGNSW)

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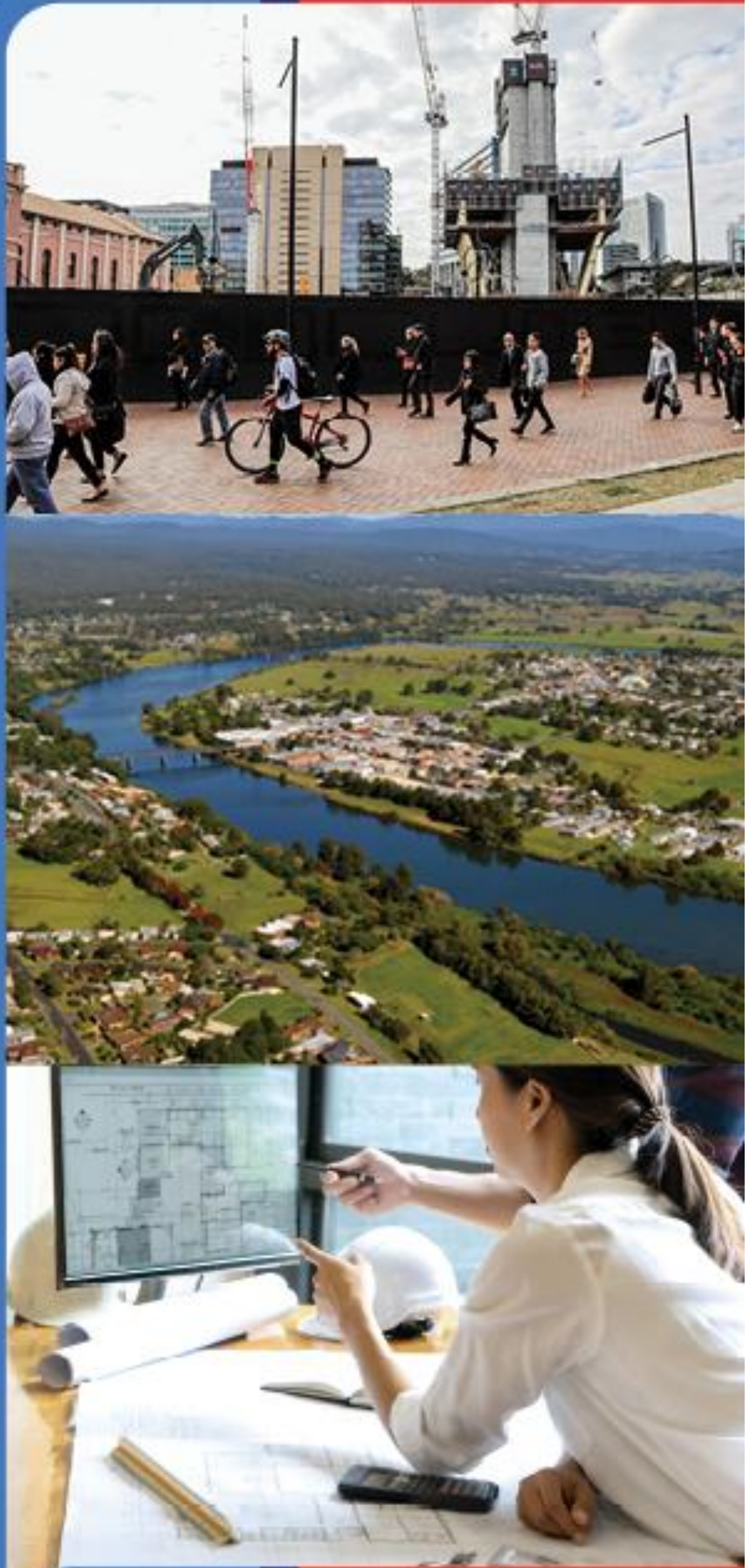
DRAFT SUBMISSION

Select Committee Inquiry into Proposed Energy from Waste Facilities

October 2025



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Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

OVERVIEW OF THE LOCAL GOVERNMENT SECTOR

- Employ nearly **50,000 people**
- Manage more than **1,800 community & public centres**
- Maintain more than **168,000km of roads & bridges**
- Manage more than **$220 billion of community assets**
- Recycle **1.75 million tonnes of waste**
- Spend more than **$2.5 billion each year on caring for the environment**
- Operate more than **380 libraries that attract tens of millions of visits each year**
- Make kerbside waste collections for more than **3.1 million households**
- Manage an estimated **4 million tonnes of waste each year**
- Spend more than **$2.4 billion on culture and recreation**

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Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

As a major land manager and point of contact with the community, NSW councils work tirelessly on the expensive and resource-intensive exercise of managing waste and recycling. Councils carry out this work to provide a clean and safe environment for the community, contributing to an evolving circular economy. LGNSW recognises that examining the place of Energy from Waste (EfW) is an important component of waste management in NSW.

LGNSW welcomes the opportunity to provide feedback to Select Committee Inquiry into Proposed Energy from Waste Facilities (the Inquiry) as this is a matter of importance and concern to local councils and other stakeholders within the local government sector. LGNSW has consulted with councils and other key stakeholders to inform this submission.

This submission is provided as a draft, pending endorsement by the LGNSW Board at its next meeting. The Committee is asked to consider this current version. We will advise of any amendments to the submission in due course.

LGNSW Advocacy Priority

Councils provide waste, recycling and resource recovery services to the community, navigating the complexities of sourcing and/or generating recycling and disposal options. Framed by circular economy principles, they work diligently to reduce the amount of waste ending up in landfill and the environment. Councils recognise that dealing with waste is a whole of community exercise and seek to engage and educate residents, businesses and schools about waste avoidance, recycling and diversion from landfill.

Councils continue to face significant challenges from increasing waste generation, decreasing landfill capacity, and lack of markets for Australian recycled content. All levels of government, as well as business and the community need to work together as we move to a more circular economy where materials and products remain within the economy for longer and waste is reduced.

Energy from Waste (EfW) remains a contentious issue, generating council and community concern primarily in relation to human and environmental health. Attaining social licence for EfW implementations requires a broader approach to community engagement that must not solely rely on local government’s communication capacity and strategy.

The LGNSW Policy Platform consolidates the voices of councils across NSW, reflecting the collective positions of local government on issues of importance and guiding LGNSW in its advocacy on behalf of the local government sector. As set out in the Policy Platform, LGNSW advocates for:

Waste and Recycling

11.2 Transitioning to a circular economy and keeping materials in use for longer which requires a focus on higher-order waste management options, noting that lower-order options can have negative impacts on human and environmental health. As such we:

a. Acknowledge concerns regarding the impact of waste to energy incinerators on communities and the environment.

b. Note that the POEO Regulation prohibits waste to energy in some places and not others.

c. Consider burning waste material to generate energy as an outdated technology and encourage diversion rather than incineration.

Climate Change

LGNSW also advocates for:

10.1 Urgent action to address the climate emergency in a bipartisan manner to make clear, effective and unambiguous steps to avert a climate crisis in NSW, including via a reduction of Australia's carbon emissions through effective mitigation strategies.

10.5 Emission reduction measures through a market mechanism across all sectors of the economy including energy generation, mining, transport, waste, construction, buildings and agriculture (excluding a cull of national livestock).

In relation to EfW specifically, transitioning to a circular economy and keeping materials in use for longer requires a focus on higher-order waste management options, noting that lower-order options can have negative impacts on human and environmental health. From a waste hierarchy perspective, EfW remains the last call and should only be used for non-recyclable materials post-sorting. With appropriate technology and stringent monitoring, EfW is seen by some as a means of re-using these non-recyclables productively and reducing waste to landfill. This may include the treatment of organics, including FOGO, through anaerobic digestion, especially if heavily contaminated or the capacity of current infrastructure to manage it cleanly is exceeded.

Some councils have referred to precedents for best practice in EfW recovery set by other jurisdictions, such as in Europe and Japan, as demonstrating rigorous and effective emissions controls. However, this has not ameliorated concerns across all councils and their communities.

Response

The Inquiry into the Proposed Energy from Waste Facilities sets out a set of questions in its Terms of Reference (TOR) as investigating:

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
b) the spread of the emissions predicted and the quality of emissions to be generated
c) health impacts from currently operating older technology waste incinerators as compared to the proposed newer technology
d) impacts on human health including on regional town drinking water, rainwater harvesting and soil contamination
e) the impact on agriculture locally and across the wider region
f) alterations to the Parkes Special Activation Precinct specifically in relation to the proposed Energy Recovery Facility in that region
g) impacts of waste-dumping over a number of decades in the Tarago region
h) the methodology of emission monitoring employed by leading large scale waste-to-energy facilities in Australia and across the world
i) alternative solutions to reduce and manage residual waste produced by Greater Sydney, and
j) any other related matters.

LGNSW has collated feedback from across local government to inform this submission. Councils' responses to the (TOR) coalesced into questions around the following themes:

1. Technology, Innovation, and System Integration
2. Emissions, Health, and Environmental Risk
3. Investment Viability, Market Confidence, and Economic Competitiveness
4. Equity, Regional Fairness, and Social Licence
5. Governance, Policy Coherence, and Long-Term System Design

LGNSW notes that EfW remains a lower order consideration on the waste hierarchy. The EPA needs to ensure the technology is robust, well monitored, causes no harm to human health or the environment, and that community engagement is not left up to councils to undertake. The following response expands on these themes and also draws on LGNSW's previous NSW EPA Energy from Waste Framework and Options submission.

1. Technology, Innovation, and System Integration

Thermal treatment of waste that involves or results in energy recovery is currently prohibited in NSW, unless the activity has been issued an exception under the POEO (General) Regulation 2022. The primary exception is if the activity is carried out in the gazetted areas of Tarago and Parkes Energy Recovery Facilities.

Councils drew strong distinctions between outdated mass-burn incineration technologies and newer, cleaner alternatives such as gasification, pyrolysis, and biochar systems. The latter are seen by some councils as more modular, adaptable, and appropriate for local or regional applications, contrasting with the risks and social opposition associated with large-scale combustion plants. Concerns were raised that the technologies proposed for NSW have not all been proven under Australian conditions, with councils calling for evidence-based evaluation and demonstration before approval.

International examples, such as Sweden's integrated EfW models, highlight the importance of pre-sorting and the benefits of mini-MRFs (materials recovery facilities) to remove recyclables before combustion, ensuring that only non-recyclable residuals are treated thermally. Some councils also advocated for smaller, distributed facilities co-located with industrial users or existing waste infrastructure, enhancing system resilience and reducing long-haul waste transport. Integration with industrial energy demand, particularly as part of NSW's decarbonisation strategy, was seen as key to achieving both environmental and economic benefits. Importantly, councils argued that the cost of enhanced and additional pre-processing must not fall to them beyond current practices.

Councils had previously noted that the terminology used to define EfW processes impacts innovation and market development in relation to the range of materials accepted. As discussed in the previous submission, Section 142 of the POEO (General) Regulation 2022 prohibits energy recovery from thermal treatment of waste (except in the designated precincts) and therefore the definition of 'thermal treatment' is pivotal. The NSW EPA is proposing to change the definition of 'thermal treatment' to:

- Expand the exclusions to allow processes that treat waste to produce 'like for like' products or inputs for those products, not only for plastic.
- Expand the exclusions to allow for processes that make a product that has a clear environmental benefit in line with criteria specified in the regulation or guidelines.

LGNSW notes that expanding the exclusions to the definition will enable more materials (other than plastic) to be processed and remanufactured, thereby contributing to the circular economy. This change should assist the policy to remain flexible and encourage innovation including different approaches to achieve better environmental outcomes.

Recommendation 1: That the NSW Government works with all impacted councils and responds effectively to any concerns raised in each case.

Recommendation 2: That the NSW Government fully examine proven EfW technologies such as gasification and pyrolysis that have demonstrated low-emission performance internationally, whilst also requiring independent validation and demonstration of their performance under Australian operating conditions prior to large-scale deployment.

Recommendation 3: That where EfW is considered appropriate and has council and community support, as part of management of end of life waste, the NSW Government mandates pre-sorting and material recovery integration (e.g. mini-MRFs) to ensure EfW complements recycling and does not replace it.

Recommendation 4: That where EfW is considered appropriate and has council and community support, the NSW Government prioritise co-location with industrial energy users to enhance efficiency and support renewable energy transition pathways and consider distributed system designs involving multiple smaller regional facilities near waste sources to minimise haulage emissions and strengthen local circular economies.

2. Emissions, Health, Processing and Environmental Risk

Emissions and Health

Councils and communities are deeply concerned about EfW emissions and wastes, and opinions remain divided across the local government sector. Concerns over air quality, human health, and hazardous waste residues were central to councils' discussions. LGNSW has received council comments regarding emission monitoring cycles, emission limits and up-front processing requirements.

Continuous emissions monitoring, independent verification, and public disclosure of real-time data were viewed by councils as essential for community trust. Councils stressed the need to benchmark emissions performance against global best practice and to contextualise results against other major pollution sources (e.g. coal-fired power, transport, landfill) to improve transparency and understanding. A comparative approach would provide a more equitable understanding of emissions monitoring requirements across waste management systems.

Councils raised concerns regarding air pollution control residues (APCr), the fine particulate waste from flue gas cleaning, which are hazardous and lack safe disposal options in Australia. While bottom ash reuse in road construction is proven internationally, Australia's absence of a national APCr treatment or containment strategy poses long-term environmental and liability risks, especially if on-site containment cells degrade over time. There is a view that without addressing this gap, EfW cannot claim environmental responsibility or public credibility.

Recommendation 5: That EfW regulations should focus on the EfW facility outputs and their impact on human and environmental health with the onus on the operator to meet the output standards, regardless of the plant inputs.

Recommendation 6: That the NSW Government mandate continuous, publicly accessible emissions monitoring with third-party verification of performance, and incorporate contextualised emissions communication to help the public understand relative risks and benefits.

Recommendation 7: That the NSW Government require independent health impact assessments and long-term community health monitoring for EfW projects, and that the NSW EPA establish transparent emissions benchmarking and reporting protocols aligned with EU and OECD standards to support public health protection and accountability.

Recommendation 8: That the NSW EPA work with federal government to develop a national framework for APCr management, including safe transport, treatment, and storage infrastructure.

Processing Requirements and Environmental Risk

In relation to potential input restrictions and pre-processing requirements for materials destined for EfW facilities, councils are concerned over the heightened risks around hazardous materials such as batteries. Should council pre-sorting of material destined for EfW be mandated, this would impact kerbside collections and place an extra burden on councils. Regulations that focus on output standards would enable responsibilities to be shared across key stakeholders. Precedents have been set for this in other states, such as South Australia, where kerbside source separation is accepted as adequate.

By remaining flexible rather than mandated, councils' pre-processing strategies can continue to address the challenges posed by kerbside contamination, such as batteries, in a pro-active and responsive manner. This also avoids loss of potential waste streams that are not always source separated, such as commercial and industrial waste:

Recommendation 9: Where EfW is considered appropriate and has council and community support, pre-processing of materials for EfW (beyond the existing settings) must not be mandated for councils but is a required shared responsibility across key stakeholders.

3. Investment Viability, Market Confidence, and Economic Competitiveness

Some councils have noted that the 'locking in' of specific precincts may give a commercial advantage to specific commercial operators in the waste arena who own the allocated land. Competitive neutrality requires a robust approach to precinct selection that aligns with the upcoming *NSW Waste Infrastructure Needs Analysis*.

In addition, EfW investment in Australia faces a challenging financial landscape. Some councils cited the issues faced by the projects in Western Australia (East Rockingham, Kwinana) as a cautionary example of technical and financial fragility, which led to major investor write-offs and reduced market confidence. In the current regulatory and market environment EfW is not cost-competitive with landfill and councils are concerned that the waste levy may end up being increased to achieve parity and support the viability of EfW. This would be unpalatable for communities and councils.

Without government co-investment, financial guarantees, and long-term energy offtake agreements, proponents are unlikely to attract credible financiers or technology partners. Some councils stressed the importance of clear risk-sharing mechanisms to prevent cost blowouts being passed on to local governments and ratepayers. Aligning EfW with state energy and decarbonisation goals, through integration with commercial enterprises and regional energy planning, could improve project stability and help secure industrial offtake partners.

Recommendation 10: That the NSW Government introduce government-backed co-investment and risk-sharing models to de-risk private capital participation and thus strengthen the sustainability of the waste management supply chain and associated infrastructure.

Recommendation 11: That the NSW Government review waste levy and energy pricing structures to ensure equitable costs for councils and enable true competitiveness comparisons for waste treatment and management options.

Recommendation 12: That the NSW Government require clear financial transparency and contingency planning to avoid local government exposure to cost overruns e.g. contractual obligations, transport, disposal of excess materials from disasters such as floods or fires.

Recommendation 13: That the NSW Government support stable, long-term offtake agreements with industrial or grid partners to underpin financial viability.

Recommendation 14: That the NSW Government examine how EfW fits best within NSW's clean energy transition strategy, ensuring consistency with decarbonisation targets and including comparatives with existing technologies such as landfills and coal-fired systems.

Recommendation 15: That the NSW Government use the NSW Waste Infrastructure Needs Analysis when identifying and developing infrastructure precincts, and that equity is applied to precinct selection to avoid unfair advantage to specific commercial organisations.

4. Equity, Regional Fairness, and Social Licence

Equity and Regional Fairness

In our consultations with councils, regional fairness emerged as a defining issue, with a widespread perception that Sydney is exporting its waste burden to regional areas. Councils argued that such arrangements undermine social licence and exacerbate existing inequalities between metropolitan and regional NSW. Some councils pointed out that long-distance waste transport increases both carbon emissions and system vulnerability, especially under climate-related disruptions such as floods or bushfires.

Councils expressed frustration at the lack of transparent site selection processes and the absence of clear regional benefit-sharing mechanisms. Without tangible returns, such as local jobs, infrastructure, or affordable energy access, hosting EfW facilities can be perceived as an imposed environmental burden rather than a shared opportunity.

Recommendation 16: That the NSW Government commit to transparent, criteria-based site selection processes that balance urban and regional impacts.

Recommendation 17: That the NSW Government establish regional benefit-sharing frameworks, ensuring host communities receive economic, energy, and infrastructure dividends.

Transport Considerations

EfW currently benefits from being free of the waste levy, creating an opportunity and incentive for increased diversion from landfill to the end of use waste stream. However, costs involved in transporting waste to sites outside of the Sydney basin may result in increased charges. Councils support the principle for waste to be managed, whenever possible, close to its source. However, the POEO (General) Regulation 2022 and Division 28 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 set out the current controls for thermal energy from waste developments, stating that, unless exempt, thermal treatment of waste resulting in energy recovery is prohibited. While LGNSW recognises that this is currently under review, we note that some councils have commented that environmental outcomes, especially those relating to transport, would be improved if waste is treated close to its source of generation. These councils have questioned the decision-making process around gazetted EfW site choices and presented arguments for alternative sites closer to where waste is generated.

Transportation increases costs, risks, environmental impacts and contradicts the aims of the NSW Government regarding emission reductions, raising questions as to whether Infrastructure NSW has earmarked funding to manage the increased demands placed on the road system for transportation of waste to the regions.

Recommendation 18: That the NSW Government minimise long-haul waste transport by developing regionalised resource recovery networks closer to waste generation points.

Recommendation 19: That EPA and Infrastructure NSW explore alternative sites with interested councils, especially those with pre-existing transport networks (such as rail), for potential inclusion in EfW precincts.

Social Acceptance and Community Engagement

The issues around community engagement with EfW continue to be raised by councils as a concern. LGNSW recognises the need to meet NSW's 80% diversion targets and consistently advocates for a holistic approach to waste management, including community engagement with waste hierarchy actions. However, EfW lacks strong public support with some councils opposing it, consistent with local community sentiment. If it is to proceed, proponents and the NSW Government must provide information and respond to questions in relation to environmental safety / emissions, landfill reduction, assurance of exhaustive resource recovery prior to EfW application and strict regulation and monitoring.

For effective EfW implementation, community agreement is essential. Some councils have noted the advantages it offers for energy production, landfill reduction and job creation. They have also noted that building trust in EfW technology requires education that addresses all reasonable concerns in the community, especially those around potential emissions and pollution.

Such communications will be vital in creating a social licence to operate such facilities. While both industry and councils can assist, experience has shown that without effective support from government, one-off development proposals are likely to face significant community opposition. As a minimum, community benefit sharing frameworks and the positive outcomes of these facilities must be of sufficient scale and impact that they earn social acceptance. Once a fair framework is in place, an education piece can promote community understanding around waste generation, management options and the potential environmental and economic benefits of system choice. The limited visibility of the NSW EPA in community engagement processes has also eroded confidence, highlighting the need for consistent, independent oversight.

Recommendation 20: That the NSW Government and proponents apply a more strategic effort to build social licence, with better integration of EfW into planning and recovery targets, plus a requirement that local government will not solely be responsible for building social licence.

Recommendation 21: That the NSW Government embed community engagement from the earliest stages of project planning, implementing co-design approaches to enable meaningful community participation in monitoring, risk communication, and local decision-making, and ensure ongoing EPA-led public engagement and oversight from project inception through to operation.

5. Governance, Planning, Policy Coherence, and Long-Term System Design

Councils have highlighted that NSW's waste, energy, and planning frameworks operate in silos, creating uncertainty and inefficiency in waste management decision-making, including EfW. The current fragmentation across ministerial portfolios limits the state's ability to deliver an integrated, circular resource recovery system. EfW should not be treated as an isolated technology but as one element within a coherent waste hierarchy that prioritises avoidance, reuse, and recycling before thermal treatment.

Councils advocate for a "joined-up" governance approach, anchored in the NSW Waste and Circular Infrastructure Plan (under review), to coordinate EfW with organics processing, recycling, disaster waste management, and net-zero strategies. Long-term spatial planning, based on infrastructure mapping and capacity modelling, is essential to determine where EfW facilities best fit within the broader waste system. Clear leadership and consistent policy direction would provide both industry certainty and community assurance.

Governance and Planning Approval Challenges

LGNSW recognises work currently underway in relation to the waste levy and waste infrastructure needs in NSW, and we continue to advocate for a connected approach.

Some councils have identified that the NSW Government's Industrial Lands Action Plan (ILAP) could be leveraged as a tool to expedite the identification, acquisition, and protection of suitable land for waste infrastructure. It is critical that this is done in close consultation with local government. The ILAP could include an *Essential Services – Waste Management and Resource Recovery* infrastructure category to identify suitable waste infrastructure locations and shield current waste facilities from urban encroachment. This could include:

- Waste bulking and rail-head access facilities.
- Waste transfer stations.
- Materials recycling or organics processing facilities.
- Community recycling and reuse centres.
- Waste collection vehicle depots.
- Landfill facilities.
- Energy-from-Waste (EfW) facilities.

Recommendation 22: That the NSW Government adopts a holistic approach to the planning of waste facilities, whereby EfW facilities are planned in alignment with the Waste Infrastructure Plan and receive coordinated government support, rather than relying solely on the EPA.

Recommendation 23: That the NSW Government establish a cross-agency governance framework integrating waste, energy, and planning portfolios, and requiring improved collaboration across government agencies to ensure waste infrastructure is strategically planned, coordinated, and responsive to existing concerns about disjointed planning efforts.

Recommendation 24: That the NSW Government ensures EfW retains its position in the waste hierarchy and complements, not competes with, recycling and organics recovery.

Recommendation 25: That the NSW Government create a state-level EfW advisory body for oversight, policy coherence, and continuous improvement.

Recommendation 26: That should EfW proceed, the NSW Government integrate EfW policy explicitly with NSW's Circular Economy and Net-Zero strategies, ensuring long-term alignment.

Recommendation 27: That the NSW Government develop statewide infrastructure mapping and spatial planning to guide EfW site selection and scale.

Conclusion

LGNSW thanks the Select Committee for the opportunity to provide input into the Proposed Energy from Waste Facilities in NSW Inquiry. LGNSW's recommendations to the Inquiry reflect matters raised by councils, in particular around the environmental credentials of emerging technologies and addressing community and environmental concerns. Transparent monitoring processes and enhanced holistic infrastructure planning, ensuring equitable site selection and a structured community engagement process would contribute to a more transparent and effective planning approach. Some councils commented on the site selection processes and the potential benefits of integration of EfW on former industrial sites as a means of reducing transport-related emissions and processing waste close to its source. Others were concerned about their communities' reactions.

Social acceptance remains a pivotal challenge for EfW projects, as exemplified by councils' diversity of views. Where councils support EfW and a fair framework for community benefits is in place, a well-structured public education initiative, similar to those used for renewable energy projects, is necessary to build trust and social licence. Without government-led efforts to inform communities and engage stakeholders, EfW developments risk continued resistance and potential project failures that will impact meeting landfill diversion targets.

LGNSW in general considers burning waste material to generate energy as an outdated technology and encourages diversion rather than incineration. We advocate that further refinements in regulatory clarity, equitable site selection, emissions control, and public engagement strategies are necessary. LGNSW is keen to work with the Inquiry on enabling a collaborative approach across government, industry, and community stakeholders that addresses resource preservation, waste avoidance and diversion from landfill.

For further information or to discuss this submission, please contact Esther Landells, Senior Policy Officer - Waste.

Summary of Recommendations

1. Technology, Innovation, and System Integration

1. That the NSW Government works with all impacted councils, and responds effectively to, any concerns raised in each case.
2. That the NSW Government fully examine proven, EfW technologies such as gasification and pyrolysis that have demonstrated low-emission performance internationally, whilst also requiring independent validation and demonstration of their performance under Australian operating conditions prior to large-scale deployment.
3. That, where EfW is considered appropriate and has council and community support, as part of management end of life waste, the NSW Government mandates pre-sorting and material recovery integration (e.g. mini-MRFs) to ensure EfW complements recycling and does not replace it.
4. That, where EfW is considered appropriate and has council and community support, the NSW Government prioritise co-location with industrial energy users to enhance efficiency and support renewable energy transition pathways and consider distributed system designs involving multiple smaller regional facilities near waste sources to minimise haulage emissions and strengthen local circular economies.

2. Emissions, Health, Processing and Environmental Risk

5. That EfW regulations should focus on the EfW facility outputs and their impact on human and environmental health with the onus on the operator to meet the output standards, regardless of the plant inputs.
6. That the NSW Government mandate continuous, publicly accessible emissions monitoring with third-party verification of performance, and incorporate contextualised emissions communication to help the public understand relative risks and benefits.
7. That the NSW Government require independent health impact assessments and long-term community health monitoring for EfW projects, and that the NSW EPA establish transparent emissions benchmarking and reporting protocols aligned with EU and OECD standards to support public health protection and accountability.
8. That the NSW EPA develop a national framework for APCr management, including safe transport, treatment, and storage infrastructure.
9. Where EfW is considered appropriate and has council and community support, pre-processing of materials for EfW (beyond the existing settings) must not be mandated for councils but is a required shared responsibility across key stakeholders.

Summary of Recommendations cont'd

3. Investment Viability, Market Confidence, and Economic Competitiveness

10. That the NSW Government introduce government-backed co-investment and risk-sharing models to de-risk private capital participation and thus strengthen the sustainability of the waste management supply chain and associated infrastructure.
11. That the NSW Government review waste levy and energy pricing structures to ensure equitable costs for councils and enable true competitiveness comparisons for waste treatment and management options.
12. That the NSW Government require clear financial transparency and contingency planning to avoid local government exposure to cost overruns e.g. contractual obligations, transport, disposal of excess materials from disasters such as floods or fires.
13. That the NSW Government support stable, long-term offtake agreements with industrial or grid partners to underpin financial viability.
14. That the NSW Government examine how EfW fits best within NSW's clean energy transition strategy, ensuring consistency with decarbonisation targets and including comparatives with existing technologies such as landfills and coal-fired systems.
15. That the NSW Government use the NSW Waste Infrastructure Needs Analysis when identifying and developing infrastructure precincts, and that equity is applied to precinct selection to avoid unfair advantage to specific commercial organisations.

4. Equity, Regional Fairness, and Social Licence

16. That the NSW Government commit to transparent, criteria-based site selection processes that balance urban and regional impacts.
17. That the NSW Government establish regional benefit-sharing frameworks, ensuring host communities receive economic, energy, and infrastructure dividends.
18. That the NSW Government minimise long-haul waste transport by developing regionalised resource recovery networks closer to waste generation points.
19. That EPA and Infrastructure NSW explore alternative sites with interested councils, especially those with pre-existing transport networks (such as rail), for potential inclusion in EfW precincts.
20. That the NSW Government and proponents apply a more strategic effort to build social licence, with better integration of EfW into planning and recovery targets, plus a requirement that local government will not solely be responsible for building social licence.
21. That the NSW Government embed community engagement from the earliest stages of project planning, implementing co-design approaches to enable meaningful community participation in monitoring, risk communication, and local decision-making, and ensure ongoing EPA-led public engagement and oversight from project inception through to operation.

Summary of Recommendations cont'd

5. Governance, Planning, Policy Coherence, and Long-Term System Design

22. That the NSW Government adopts a holistic approach to the planning of waste facilities, whereby EfW facilities are planned in alignment with the Waste Infrastructure Plan and receive coordinated government support, rather than relying solely on the EPA.
23. That the NSW Government establish a cross-agency governance framework integrating waste, energy, and planning portfolios, and requiring improved collaboration across government agencies to ensure waste infrastructure is strategically planned, coordinated, and responsive to existing concerns about disjointed planning efforts.
24. That the NSW Government ensures EfW retains its position in the waste hierarchy and complements, not competes with, recycling and organics recovery.
25. That the NSW Government create a state-level EfW advisory body for oversight, policy coherence, and continuous improvement.
26. That should EfW proceed, the NSW Government integrate EfW policy explicitly with NSW's Circular Economy and Net-Zero strategies, ensuring long-term alignment.
27. That the NSW Government develop statewide infrastructure mapping and spatial planning to guide EfW site selection and scale.