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17/12/2015

Submission On the Draft Plan
Metropolitan Waste and Resource Recovery Group

DRAFT METROPOLITAN WASTE AND RESOURCE RECOVERY IMPLEMENTATION PLAN

We welcome the opportunity to comment on the Draft Plan and note in agreement as mentioned in the Executive Summary, “***the priority of this plan – is to reduce the need for landfilling by making use of alternative technologies***”.

Please find our comments on the Draft Plan as follows:

- **What do you see as being the key recycling infrastructure for Melbourne?**

The Draft Plan recognizes that Waste to Energy has a role in completing the diversion of waste from landfill in Metropolitan Melbourne. Unfortunately the Plan appears to rely on dated and poorly informed metrics regarding the economics and scalability of these technologies today and consequently DOES NOT factor this technology into the immediate (inside 10yr) infrastructure deployment plan. A **Waste to Energy** plant or **Alternative Waste Technology (AWT)** could be operational and economic at current gate rates with construction in Melbourne in 2016 for operation in 2017 as an immediate and viable option to landfill (particularly in the South East) at comparable costs.

Wind Pacific and our technology partners Jereh, have a medium scale waste to energy technology able to process 100,000 tpa that is typically one third the investment of many other plants making the processing of waste feasible at current landfill costs.

In addition to the growing cost of landfill, there are many environment and social benefits from building this waste to energy infrastructure in strategic locations around the perimeter of Melbourne. This includes changing the transport and logistics dynamics proposed in the current plan that will increase the burden on roads, transit times around Melbourne and the necessity for operators in the S.E. to expand their fleets to accommodate the greater logistic task.

The placement of AWT at a south east, northern and western Melbourne location would see trucks travelling **out** of Melbourne rather than into and through increasingly congested areas.

- **What do we need to consider when planning new infrastructure?**

An holistic approach to planning new infrastructure must include the location, transport and logistical implications of managing waste. At this time the plan appears to be present a compartmentalized perspective of the waste task largely ignoring the transport task and its incremental environmental and social costs. It also fails to consider the potential that AWT, such as Energy from Waste could have, in stimulating industrial co-investment and jobs.

The implementation of “hub and spoke” plan for waste infrastructure is logical but the plan does not really address the potential “length” of the spokes. The hub and spoke system will be far more efficient with the deployment of more distributed infrastructure for the final treatment of residual waste. The shorter the “spokes” the more efficient the logistics task and the more productive, economic and environmentally compliant the metro waste task.

- **What technology do you think has the best potential for increasing recycling/recovery?**

Waste to Energy is currently a missed opportunity in Melbourne’s waste management industry. It has not been considered a viable option in the past due to influence of vested interests and technology proposals that have been either too large, too expensive, poorly supported and consequently uneconomic, and unable to meet the expectations of regulators and community.

The scalable waste to energy technology that Wind Pacific and Jereh is implementing in Australia will disrupt established concepts about AWT. The scalability of the technology presents significant opportunity for more distributed, flexible and compact residual waste disposal locations with the metro catchment. We expect local commitment to this technology being accelerated in the next 12 months.

Many Councils around Melbourne and Victoria are seeking viable AWT proposals and solutions from us in response to their own Strategic Waste Management plans. In addition, many community groups are enthusiastic at this prospect and have been instrumental in lobbying their Councils for the uptake of AWT.

What other action do you think we need to take to reduce our reliance on landfills?

There have been a number of fires at landfills, illegal dumps and within storage areas of industrial processing companies. Often this creates hazardous fumes and smoke and threatens lives and nearby residents.

The current prevalence of poorly managed and “questionable” resource recovery practices in and around metropolitan Melbourne serve to undermine investment in more prudential technologies and resource recovery activities that meet requisite regulatory requirements and preferred policy outcomes. More active pursuit and enforcement of questionable resource recovery operations will enhance investor confidence in more robust waste recovery infrastructure. A broader application of the landfill levy on any waste received

facilities supported by a rebate system that once diversion is in evidence could reduce the practices of stockpiling and dumping across all waste types. Consistency in the application of policy, definition of waste, approved treatment processes and the treatment of waste handlers by the EPA will also encourage investment in more robust technology solutions.

On many occasions these fires are entirely avoidable and have come about from poor landfill management, lack of corporate governance, unreputable operators and insufficient oversight by environment enforcement agencies.

The lack of facilities such as AWT to properly handle many of these waste streams has encouraged the actions which have led to these fires and poor handling practices more broadly.

If you require any further details, please contact Craig Eyes on [REDACTED] or email [REDACTED]