



29 June 2018

To the EPA,

RE: Submission to Works Approval application by Australian Paper for a Maryvale paper mill waste-to-energy project

Thank you for the opportunity to provide comments on the proposed Maryvale waste-to-energy power station.

Environment Victoria is one of Australia's leading independent environment groups. With more than 40 member groups and 150,000 individual supporters, we've been representing Victorian communities on environmental matters for almost 50 years. Through advocacy, education and empowerment, Environment Victoria seeks significant and enduring solutions that will safeguard the environment and future wellbeing of all Victorians.

We have a number of concerns about the proposal, outlined below, but these can be distilled into a simple position: we believe Victoria needs to take every opportunity to urgently shift to zero emissions and a circular economy. The proposed waste-to-energy facility would do precisely the opposite to this: it would destroy physical resources and lock in 25 years of polluting electricity supply.

Our specific concerns include:

- **The assumption that the waste stream will continue to have high amounts of organic content.** It is likely that the amount of food and garden waste in the municipal waste stream will decline significantly over time as higher value uses become more common. Paper and cardboard are also likely to be recycled more. If/when these resources are removed, the waste-to-energy facility is likely to be burning higher and higher percentages of plastics – this would make the facility effectively a fossil fuel power station.
- **The sheer scale of the facility creates its own demand and undermines efforts to achieve more sustainable resources outcomes.** The operators of this facility will no doubt want to recover their investment. However, in an ideal world, Victoria should be aiming to significantly cut the amount of waste it produces as we shift towards a circular economy. This would mean an ever diminishing supply of raw materials to feed the incinerator. We are concerned that a push by Australian Paper to recoup their investment would lead to much less sustainable outcomes, effectively forcing things that *could* be recycled to instead provide the fuel for this waste-to-energy facility. This potentially makes it harder for alternative, more sustainable uses of resources to be developed, which is a poor outcome.
- **Assumptions about “avoided emissions” from other electricity generators are questionable.**
 - It is highly misleading to claim that this waste-to-energy facility will necessarily lead to a decrease in Victoria's greenhouse gas emissions. The data supplied with the application confirms that the facility would produce over 200,000 tonnes of CO₂ annually. Attempting to offset these emissions by claiming that it would displace electricity from coal misses the point, and it is not necessarily an accurate



representation of how the energy market works. What is more likely is that the operation of this facility would reduce the output from Victoria's gas-fired power stations, which have a higher short-run marginal cost than the more polluting coal generators.

- When making a decision about the works approval for the expansion of the Loy Yang B power station, the EPA decided that the higher generation and therefore higher CO2 emissions were acceptable because overall emissions in the Latrobe Valley would fall thanks to the imminent closure of the Hazelwood power station. Using the same logic here, the EPA should require the 277,000 MWh of electricity expected to be produced from this waste-to-energy facility to be offset by a reduction in output from the coal generators of 277,000 MWh. Relying on the operation of the energy market to achieve this outcome is flawed.
 - Otherwise, a facility should be judged on its own merit. The operation of this facility is expected to create an additional 350,730 tonnes of greenhouse gases. This should trigger a requirement for a full Environmental Effects Statement.
- **The assessment of total greenhouse gas emissions appears to not include the emissions associated with the transport of the 650,000 tonnes of waste from metropolitan Melbourne to the Latrobe Valley.** A small amount of transport emissions are included for the construction of the facility, and some Scope 3 emissions for waste logistics, but given the volume of additional truck and rail movements, the provided data seems to fall well short of the likely transport emissions associated with running this facility.
 - **The proposed facility lacks best-practice waste sorting.** The proposed 'visual assessment' of waste is insufficient. Should the facility proceed, it should be required to install best-practice front-end resource recovery technology to remove materials that should not be burnt or that could be recycled.
 - **The toxicity of emissions to air, scrubber waste, fly ash and bottom ash remain problematic.** While current technology is superior to past practice with incinerators, inevitably there will still be challenges with persistent organic pollutants and heavy metals. The best available pollution controls should be installed, though these would still likely not capture all toxic emissions to air. We are concerned about the risk of accumulation of persistent organic pollutants on farmland in the surrounding area. Further, the lack of suitable long-term landfill facilities to take the toxic waste and ash means that every possible measure should be taken to remove inappropriate materials from the fuel supply.

To conclude, we are concerned that allowing Australian Paper to burn approximately two thirds of Melbourne's municipal waste is a poor use of material resources which would also lock-in a new source of high levels of carbon dioxide pollution. This is not consistent with efforts to reach zero emissions, nor to create a more sustainable circular economy.

Thank you again for the opportunity to provide comments on the proposal. We would be happy to discuss this in more detail if that is of assistance to your decision-making process.

Regards,

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