



12 December 2019

Michael Masson, Chief Executive Officer
Level 33
140 William Street, Melbourne
Victoria 3000

Dear Mr Masson,

Re: Recycling and resource recovery infrastructure – Evidence base report October 2019

SUEZ welcomes the opportunity to contribute a follow-up submission to Infrastructure Victoria's Recycling and Resource Recovery Evidence Base Report. SUEZ is a global resource management leader. As experts in water and waste management, our team provides solutions that help to supply 7 million Australians with safe drinking water and divert 1.2 million tonnes of waste from landfill every year. In terms of waste and recycling, we operate more than 100 waste management facilities across the country.

SUEZ's operations in Victoria are extensive and we are well-placed to provide a response to this submission. We currently own and operate two engineered Smart Cell landfills in Hampton Park and Dandenong South, as well as operating an Organic Resource Recovery Facility in Epping, Construction & Demolition Resource Recovery Facility in Hampton Park in partnership with ResourceCo and we have recently received and EPA licence for a soil processing facility in Dandenong in partnership with Ventia.

We are providing advice to this report because SUEZ strongly believes that the circular economy is key to growth in the industry and provides multiple benefits including job creation and developing a more sustainable model of consumption overall. It takes combined responsibility and action from government, industry and waste generators to achieve this outcome. Our advice will refer to a few specific key points within the report:

5.3: Better enable use of products containing recycled materials.

SUEZ supports point 5.3 regarding the reuse of recycled materials in infrastructure and procurement opportunities. Across the world, SUEZ works with partners to turn Bottom Ash residue from energy from waste facilities into road base aggregate. The energy from waste process inherently includes material recovery. While materials with calorific value are recovered for energy, metals are recovered and by products from the process can be further processed and used as a road construction material, as is common practice in Europe. Government leadership, support and policy to enable this opportunity to take place will provide a genuine, circular and closed loop solution.

5.4: Provide clarity to the waste-to-energy sector:

SUEZ supports point 5.4 regarding the role that energy from waste plays in the sector over the next 20-30 years and the need for a stable state policy on the technology. SUEZ agrees that Victoria needs stability around policy settings and direction on the technology to support department approvals and recognition on where it plays a role in the waste hierarchy and circular economy in Victoria. SUEZ also supports the point regarding a review of the waste levy to incentivise infrastructure. SUEZ believes that the levy should be increased to at least \$100 per tonne to enable energy from waste to be an economically viable alternative to landfill.

6.2.2: Beyond the bin – recycling infrastructure for Victoria’s future:

SUEZ would like to point out and counter the point regarding the pre-sorting requirements for energy from waste in the table on page 23. SUEZ believes that if energy from waste requires pre-sorting, then so should the current disposal as landfill. Broader community and state wide education is the best way to ensure that recyclables are not in the red bin instead of pre-sorting. The “dirty MRF” process would add significant cost to the energy from waste process resulting in significant cost increases to Councils and ratepayers who are already facing pressures due to the increased cost of recycling, without a guaranteed improved outcome. Investment is therefore much better spent by government and industry to improve quality of recovered materials in the yellow bin as well as promote education in community to ensure waste is separated at source. In Europe, EfW has proven to be a flexible option for the treatment of residual waste. As additional source separation of recyclables has occurred with households in countries such as Germany and Belgium, EfW has proven adaptable to the changing waste mix. This approach will equally provide a greater return on investment for the government and can still work in harmony with a thriving energy from waste sector.

6.4.3: Waste to energy policy:

SUEZ supports the need for an energy from waste policy in Victoria. Although, this specific point in the report highlights that energy from waste can damage recovery rates, which SUEZ strongly disagrees with. This is not the industry nor SUEZ’s experience in Europe which is supported by empirical data – see Eurostat table below. Separately, the policy can be technology agnostic, although it needs to recognise that the reliability and commercialisation of technology is essential to long term operations.

Municipal waste landfilled, incinerated, recycled and composted in the EU-28, 1995 to 2017

Municipal waste landfilled, incinerated, recycled and composted in the EU-28																						change (%) 1995-2017		
1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012.0	2013	2014	2015	2016		2017	
million tonnes																								
Landfill	145	143	144	141	140	140	136	132	125	118	110	108	107	101	98	93	86	79	73	68	64	60	58	-60
Incineration	32	32	35	35	36	39	40	41	41	44	48	51	52	55	54	57	60	59	62	64	65	68	68	111
Recycling	25	28	32	35	40	40	42	46	47	49	52	54	60	60	61	63	64	66	65	68	71	73	74	196
Composting	14	16	17	18	19	24	24	26	26	28	29	31	32	34	35	35	34	35	36	38	38	41	43	205
Other	10	14	12	12	12	11	12	12	12	13	16	13	11	11	9	6	5	6	6	5	7	6	6	-43
kg per capita																								
Landfill	302	296	299	290	288	288	278	269	255	239	221	220	215	201	195	185	171	156	145	134	126	117	114	-62
Incineration	67	68	72	73	75	80	82	85	85	90	98	104	104	109	111	114	119	118	122	126	127	134	133	97
Recycling	52	59	66	72	82	83	88	95	97	99	105	109	119	120	122	124	128	130	128	134	140	143	144	175
Composting	30	34	36	37	40	49	50	53	54	57	59	62	64	70	68	69	67	70	72	74	75	81	81	175
Other	22	29	26	24	25	24	24	24	24	27	33	27	22	21	15	12	12	12	12	10	12	11	15	-32

Source: Eurostat (online data code: em_wasmun)

As an expert in energy from waste solutions, we are able to provide reference points and detailed information to meet the concerns and needs of our partners and the Government. We would welcome the opportunity to meet with you and discuss this project in more detail with Australian Paper. To arrange a meeting please do not hesitate to contact Laura Turnley, Head of Corporate Affairs and Internal Communications on 0417 107 283 or Laura.Turnley@suez.com

Yours sincerely,

Nat Bryant
State General Manager - Victoria
SUEZ Australia