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.
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