



**CONSERVATION
COUNCIL** ACT REGION

Submission to ACT Government City Services

MRF & FOGO facilities

June 2023

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

Elle Lawless, Executive Director, director@conservationcouncil.org.au.

Introduction

The Conservation Council ACT Region welcomes the opportunity to provide comment on the scoping documents for the ACT Government's proposed new Materials Recovery Facility and Food Organics and Garden Organics facility¹.

The Council supports the construction of a new FOGO facility at the chosen site in Hume and the rebuilding of a mixed materials recovery facility on the existing site. Re-establishing recycling processing in the ACT is critical to recovering the confidence of Canberrans to put their valuable waste materials into the appropriate bins.

Diverting food waste from landfill is essential to reducing greenhouse gas emissions, and the ACT Government is aware of the imperative to rapidly cut emissions from all sources as damaging climate change accelerates.

The Government must, however, not allow the building of these facilities to divert efforts from the top of the waste management hierarchy: avoidance. The scale of both facilities, particularly FOGO, should be designed to be modular, to accommodate current waste levels but be responsive to efforts to reduce consumption, rather than require "feeding the beast" to maintain financial viability.

Community education must drive a shift in thinking from "waste management" to "circular economy". This requires us to reconceptualise "wastes" as "byproducts", ie that outputs from one process become inputs to another process either onsite or at a completely different operation. Many organic byproducts could have higher-value uses than being composted, if they can be managed to an appropriate quality. Government could support this transfer of materials through:

- Mapping these processes, inputs and outputs across the ACT via an online platform that enables organisations to connect.
- Removing regulatory barriers to higher value uses (e.g. Goterra's insects could become protein for human consumption).

The Council provides the following comments on selected aspects of the MRF and FOGO facilities.

Materials recovery facility

The Conservation Council recommends the building of a mixed materials recovery facility to world best practice standard.

The greater the sorting capacity and technological capabilities of the facility, the higher quality the recovered materials will be, ensuring that these materials have a high market value which will help fund the facility.

For example, glass should be sorted by colour and feed back into glass production rather than being downgraded into trench filler. Plastics should likewise be sorted by quality and colour to feed back into circular production to reduce demand for virgin plastics.

¹ ARUP, 2022, ACT FOGO waste facility: EIS Scoping Document, https://www.planning.act.gov.au/data/assets/pdf_file/0011/2069651/SUPP-202200016-EIS.pdf

The Government should take the opportunity to collect and process a wider range of post-consumer products, partnering with local enterprises to invest in adjoining processing facilities for complex materials and feeding these back into the local market to support a circular economy. Technical nutrients such as plastics, metals, glass, concrete, textiles and minerals should be returned to technical cycles to reduce extraction of virgin resources. Invest in research collaborations, such as SMaRT@UNSW and the CSIRO, to develop solutions for complex wastes such as disposable coffee capsules, rubber tyres, electronics, medical wastes and mattresses.

For further discussion, see the Conservation Council's submissions on the Tarago Veolia Woodlawn Waste to Energy facility² and the Draft ACT Circular Economy Strategy³.

The new facility should also include collection and processing of soft plastics, given the complete failure of REDcycle and the national industry to address this massive problem.

Food and organics facility

The Conservation Council defers to the expertise of Canberra's food and organic waste and circularity enterprises:

- Capital Scraps
- Goterra
- Capital Brewing - circular use of their own organic byproducts
- Food2Soil
- Global Worming
- OzHarvest

The Council supports the choice of in-vessel composting, given consideration of a range of other options and potential impacts of each. However, these large systems produce a significant amount of methane that should be secondarily treated with proper air handling systems. Thus, we recommend implementing state of the art biofiltration for methane reprocessing to achieve better climate outcomes from the new facility.

While the Council supports the ACT facility accepting FOGO from NSW regional towns, it should closely monitor the contamination levels of imported wastes and collaborate with regional councils to provide appropriate education to ensure high quality material. The FOGO facility should be designed to be modular to quickly establish initial collections then expand or dismantle as required in the future.

Ideally, a collection and processing system that separates food waste from other organics would deliver differentiated and higher quality products as well as greater emissions reductions.

The Conservation Council recommends that commercial food waste be collected separately from household mixed FOGO and diverted to higher-value uses. The Government should also

² Conservation Council ACT Region, 2022, Submission to NSW Government Major Projects: Woodlawn Advanced Energy Recovery Centre, https://conservationcouncil.org.au/wp-content/uploads/SUBMISSION_VeoliaWoodlawnIncinerator-CCAC-TR-Dec2022.pdf

³ Conservation Council ACT Region, 2022, Submission to ACT Government: Draft ACT Circular Economy Strategy, https://conservationcouncil.org.au/wp-content/uploads/SUBMISSION_CircularEconomyStrategy_Dec2022-CCACTR.pdf

work with other producers of large quantities of FOGO waste to reduce the creation of that waste, and divert usable organic by-products to higher-value uses. Capital Brewing is an excellent example of this. Goterra also has an excellent system for processing commercial scale food waste into animal feed. The Government should be exploring regulatory barriers preventing Goterra's product from being cycled back into high-quality protein for human consumption.

Community scale composting should be supported to fill the gap while we wait for larger scale technology to catch up.

As much as practicable, products from the FOGO facility should be used locally to improve soil condition, and support urban greenery and biodiversity objectives. It should also be available for sale to local residents and businesses.

Other factors

It is critical that the new facility manage odour, dust and airborne particulates so as to ensure good air quality and social acceptance of the facilities.

Water flow across the sites must be managed to avoid washing of toxins and particulates into local waterways.

The Government should ensure state-of-the-art fire suppression systems are installed in both facilities to avoid a repeat of last year's fire.

The Government should also ensure that collection trucks are restricted in size so as to safely navigate all Canberra streets without compromising mature trees and planning for active travel infrastructure.

Community education

The new facilities must be supported by significant investment in community education to minimise contamination of both comingled recycling and FOGO collected from households. Lack of education leads to high contamination rates which leads to poor quality products which cannot be sold, leading in turn to failure of economic viability of the facilities. Money spent on education is well spent. A counter-example is the highly contaminated organic waste exported from Sydney to Veolia's Woodlawn facility, leading to unsaleable product that ends up dumped in landfill, completely defeating the purpose of collecting it from households.

Community education could be delivered in partnership with enterprises such as Capital Scraps, the Canberra Environment Centre and SEE-Change. This education should commence well ahead of completion of the facility and the start of scaled-up collections.

Circular economy

The ACT Government should invest further in developing a circular economy for Canberra. See the Conservation Council's submission on the Draft ACT Circular Economy Strategy.

This should include advocating at the national level for compulsory stewardship schemes across all product categories, and mandatory recycled content targets. These are essential for driving producer responsibility, funding to invest in recovery and processing, and markets for recovered materials.