

ITEM 2. FINAL ADVANCED WASTE TREATMENT MASTER PLAN – ADOPTION**FILE NO: S101017****SUMMARY**

This report recommends that the final version of the Advanced Waste Treatment Master Plan and associated Technical Appendix be adopted by Council. The Advanced Waste Treatment Master Plan is part of a suite of master plans focussing on energy efficiency, renewable energy, trigeneration and decentralised water.

On 12 May 2014, Council approved placing the draft Advanced Waste Treatment Master Plan and associated Technical Appendix – Gasification Technologies Review on public exhibition. The Advanced Waste Treatment Master Plan together with the Technical Appendix comprises the ‘Master Plan’.

Key stakeholders were consulted as part of the public exhibition process including two public focus groups, a stakeholder briefing, media and other communication. In addition, 136 key stakeholders comprising organisations, individuals and government departments were notified of the public exhibition and ‘one to one’ meetings/presentations were held with four key stakeholder organisations to solicit comment on the draft Master Plan.

In response to the public exhibition held between 15 May and 25 June 2014, the City received 15 submissions or other feedback, which are summarised in Attachment A. The submissions have been reviewed and, where appropriate, the Master Plan has been amended in response to the issues raised. A number of amendments are proposed to be incorporated in the Master Plan for adoption as outlined in Attachment B, and in the final Master Plan at Attachment C.

The proposed amendments improve, but do not materially change, the overall strategic directions outlined in the exhibited draft Master Plan documents.

The final Master Plan provides a blueprint for managing the city’s non-renewable waste into the future. In particular, it outlines a solution that could:

- realise greater than 95 per cent of the City of Sydney Local Government Area’s (LGA) domestic waste diverted from landfill, through a combination of recycling material and converting non-recyclable waste into renewable gas by 2030;
- replace 100 per cent of the City’s own fossil fuel natural gas consumption;
- reduce greenhouse gas emissions across the City LGA by 6.9 per cent, from avoided landfill gas emissions and conversion of non-recyclable waste into renewable gas; and
- provide an opportunity for other councils’ waste or commercial and industrial waste from the City LGA to utilise this innovative technology.

If endorsed by Council, the City will set about developing appropriate implementation actions to see this project realised. The implementation of the Master Plan cannot be delivered by the City alone. The City will need to work cooperatively with its residents and businesses, as well as appropriate delivery organisations in the private sector and other levels of government to deliver the full potential of the Master Plan.

RECOMMENDATION

It is resolved that:

- (A) Council note the Summary of Submissions received during the Public Exhibition Period as detailed in Attachment A to the subject report;
- (B) Council note the Community Reference Group Workshop Outcomes Reports for 3 June and 10 June 2014 as shown in Attachment C to the subject report;
- (C) Council approve the proposed amendments to the Final Advanced Waste Treatment Master Plan, as shown in the Schedule of Proposed Amendments to the Final Master Plan at Attachment B to the subject report and as set out elsewhere in the subject report; and
- (D) Council adopt the Final Advanced Waste Treatment Master Plan and the Technical Appendix as shown in Attachments D and E, respectively, to the subject report.

ATTACHMENTS

(Note – Hard copies of Attachments D and E will be circulated separately from the agenda paper in limited numbers. They will be available for inspection on Council’s website and at the One Stop Shop and Neighbourhood Service Centres).

Attachment A: Summary of Submissions Received during the Public Exhibition Period.

Attachment B: Schedule of Proposed Amendments to the Final Master Plan.

Attachment C: Community Reference Group Workshop Outcomes Reports for 3 and 10 June 2014.

Attachment D: Final Advanced Waste Treatment Master Plan.

Attachment E: Technical Appendix: Gasification Technologies Review.

BACKGROUND

1. Sustainable Sydney 2030 included modelling of the reduction of greenhouse gas emissions that could result from the City making an informed choice to re-direct up to 50 per cent of the city's residential and business waste to an energy from waste facility and away from landfill disposal.
2. The Interim Waste Strategy 2012 was adopted by Council on 2 April 2012. This report seeks the adoption of the Advanced Waste Treatment Master Plan, which was identified in that Strategy as part of the integration with Green Infrastructure Master Plans and as one of the necessary pre-requisites to development of a Final Waste Strategy for the city.
3. The Advanced Waste Treatment Master Plan sets out the available technologies to treat the projected levels and types of waste in the City LGA out to 2030. This treatment is intended to supplement avoidance, reuse and recycling activities carried out by the City or supported by the City. The Advanced Waste Treatment will recover energy resources from waste for use within the City as well as additional recycling of materials.
4. The combination of avoidance, recycling and treatment could deliver:
 - (a) a diversion of waste from landfill of up to 95 per cent, well above the 'business as usual' projection of 66 per cent by 2030. This level of diversion from landfill will avoid significant releases of greenhouse gas emissions;
 - (b) together with the reduction of greenhouse gas emissions associated with the use of the largely renewable energy resource provided in the Master Plan, up to 6.9 per cent reduction of greenhouse gas emissions across the City LGA can be achieved; and
 - (c) the provision of a largely renewable energy resource derived from the city's waste with sufficient gas production to allow the replacement of 100 per cent of the City of Sydney's own fossil fuel natural gas consumption.
5. Preliminary financial modelling within the Master Plan suggests that the preferred gasification technology solution is of a similar cost as existing disposal costs currently used by the City. Should the Master Plan be endorsed by Council, this financial modelling will be subject to review as further market investigations are undertaken by the City.
6. As part of the public exhibition, the City ran two Community Reference Group Workshops on 3 and 10 June 2014. Feedback from these sessions has informed the success criteria within the Master Plan for selection of a suitable site to locate any future advanced waste treatment facility, and will inform a future Advanced Waste Treatment Implementation Plan.

ADVANCED WASTE TREATMENT MASTER PLAN

7. The content of the final Advanced Waste Treatment Master Plan is substantially the same as the draft Advanced Waste Treatment Master Plan as summarised in the report to the Environment Committee on 12 May 2014. Additional paragraphs or sections of note included within the final Master Plan in response to the submissions arising from the public exhibition are summarised in this report.

ADVANCED WASTE TREATMENT IMPLEMENTATION PLAN

8. To best address the issue of potential site location, to evaluate risk and devise appropriate contract model, an Advanced Waste Treatment Implementation Plan will be prepared to follow the adoption of this Master Plan. It is also worth noting that both the Federal and NSW Governments provide funding for energy from waste infrastructure projects, and methods for inclusion of Advanced Waste Treatment under the Emissions Reduction Fund have been proposed by a Federal working group.
9. The Advanced Waste Treatment Implementation Plan will also seek the preparation of a Community Consultation and Engagement Plan to meet the requirements of the NSW Energy from Waste Policy Statement, and to address the expectations of the local community identified in the Community Reference Group Workshops held in June 2014.

ENABLING THE MASTER PLAN

10. The necessary enabling actions needed to bring about positive change and to deliver the full potential of the Master Plan at best value were summarised in the report to the Environment Committee on 5 May 2014. It should be noted that none of these enabling actions would constitute a barrier to the successful introduction of the City's Advanced Waste Treatment facility as envisaged in the Master Plan. Rather these Enabling Actions would provide surety or incentives to encourage the timely and more cost effective delivery of the Master Plan objectives.
11. In relation to Enabling Action 6: Establish New Default Greenhouse Gas Emission Values for Post-Advanced Waste Treatment Waste, Council should note that the Federal Department of the Environment is now considering changes to the measurements applied to waste under the *National Greenhouse and Energy Reporting (Measurement) Amendment Determination 2014 (No.1)*. This draft amendment will impact on greenhouse gas emission values as called for in Enabling Action 6 of the Master Plan for a number of factors, including:
 - (a) Combustion of gaseous fuels – changes to use of international standards; and
 - (b) Solid waste disposal on land – provision of new default waste mix percentages and reporting flexibility for waste, depending upon the application of treatment or separation of components within the waste stream.

NSW ENERGY FROM WASTE POLICY STATEMENT

12. The NSW Government released a final version of its Energy from Waste Policy Statement in April 2014. The Policy establishes the criteria by which licencing of energy from waste facilities will be determined. The key criteria are:
 - (a) Technical Criteria – requirements for minimum temperature thresholds and continuous measurement of emissions to protect air quality;
 - (b) Thermal Efficiency Criteria – assurance that a facility is designed for energy resource recovery and not just destruction of waste; and

- (c) Resource Recovery Criteria – assurance that provisions are made to promote source separated recycling through limits surrounding the levels of waste available for use as feedstock in an energy recovery facility based on collection practices.
13. Following the submission from the City to the NSW Environment Protection Authority (EPA) on the draft Energy from Waste Policy in May 2013, the EPA included some additional provisions in the final Policy to allow its consideration to modify the application of the Resource Recovery Criteria to highly urbanised areas such as the City LGA. The City is currently in discussion with the EPA to reach agreement on the application of the Resource Recovery Criteria to the city's waste to allow for certainty of feedstock levels should the City wish to procure a facility.
 14. The final Master Plan notes that the preferred technologies address all three major criteria sufficiently to expect a satisfactory outcome when seeking a licence for an energy recovery facility using the city's waste.
 15. The NSW Energy from Waste Policy also sets a requirement for providing effective information and public consultation about energy from waste proposals. The Master Plan and the Community Reference Group Workshops conducted by the City will form part of the delivery of this requirement.

KEY IMPLICATIONS

Strategic Alignment - Sustainable Sydney 2030

16. *Sustainable Sydney 2030* is a vision for the sustainable development of the city to 2030 and beyond. It includes 10 strategic directions to guide the future of the city, as well as 10 targets against which to measure progress. This Master Plan is aligned with the following strategic directions and objectives:
 - (a) Direction 1 – A Globally Competitive and Innovative City – the Master Plan provides the platform for the City to meet international standards for diverting waste from landfill and improving the recovery of resources in waste. The Master Plan also establishes renewable energy opportunities for the City LGA. The combination of technology solutions, such as the delivery of renewable gas derived from waste to the City via existing gas networks, will drive innovation.
 - (b) Direction 2 provides a road map for the City to become A Leading Environmental Performer – the Master Plan provides the basis for the City to achieve the highest diversion of waste and resource recovery levels in NSW. The Master Plan provides a sound evidence base for facilitating decentralised energy solutions within the objectives. Successful implementation of the preferred solutions in the Master Plan will contribute to meeting the City's greenhouse gas emissions reduction targets and delivery of renewable energy to the City.

- (c) Direction 10 - Implementation through Effective Governance and Partnerships – the implementation of the Master Plan can only be partly delivered by the City alone. The NSW Energy from Waste Policy Statement provides a framework for the City to further develop its preferred solution. Continued engagement with the community and stakeholders will be required to obtain a “social licence to operate” if the project is to be a success. In addition, it is likely that the City will need to partner with other councils and/or use commercial and industrial non-recyclable waste to deliver an operational solution.

Strategic Alignment – Renewable Energy Master Plan

17. On 9 December 2013, Council resolved to adopt the Renewable Energy Master Plan. A key component of the Renewable Energy Master Plan was to replace fossil fuel natural gas supplying the City’s energy needs with renewable gases from waste and other renewable energy sources by 2030. The objectives and technologies outlined in the Advanced Waste Treatment Master Plan will deliver against that resolution.

Strategic Alignment – Interim Waste Strategy 2012

18. The Interim Waste Strategy 2012 was adopted by Council on 2 April 2012. The key focus area 3 of that Strategy called for finalising the Advanced Waste Treatment Master Plan and integrating the treatment systems within the Master Plan with other Green Infrastructure projects. The Strategy also required the Master Plan to seek technical solutions that would reduce residual waste disposal to landfill to less than 10 per cent. The Advanced Waste Treatment Master Plan is aligned with both of these strategic objectives.

Organisational Impact

19. Organisational capacity is already established and committed to within the City to further develop the Advanced Waste Treatment solution as outlined in the Master Plan.

Risks

20. The implementation of the Master Plan cannot be delivered by the City alone, nor can the outcomes be realised in a short time frame. The City will need to communicate its direction effectively to the community and businesses to obtain a social licence to develop such a facility. The success of this Master Plan will depend on the acceptance of this approach for the recovery of energy from waste by the local community, local government and/or project partners.
21. Successful selection of a location for a facility will be essential to implement the Master Plan. The City has obtained strong feedback from the local community that they consider proximity, low traffic impact, and strong community benefits sharing to be of high importance in the choice of location. The development of these success criteria to guide selection of a suitable location should be continued to allow a high level of community participation in the enabling of a decision.
22. The recent NSW Energy from Waste Policy Statement sets a number of criteria that a facility must meet to obtain a regulatory licence to operate. The City is already in discussion with the NSW Government to effectively and efficiently demonstrate how the project meets all of the requisites of the new policy.

23. The City does not control sufficient waste resources to provide full feedstock levels for a facility to achieve the most optimum economies of scale and requires additional sources of waste. The City has kept the business community informed of potential opportunities from energy from waste. The City has also participated in a Regional Waste Strategy with other member councils of the Southern Sydney Regional Organisation of Councils, and is the lead member of the Energy from Waste regional sub-group. The aim of the sub-group is to inform and educate SSROC councils to encourage their deliberations to proceed to an energy recovery solution as part of an integrated waste strategy.

Social / Cultural / Community

24. As part of the public exhibition, the City held two Community Reference Group Workshops on 3 and 10 June 2014. As a result of these workshops, the success criteria for locating a suitable site for a treatment facility have been expanded and re-ordered in the Master Plan to reflect the responses in the workshops.
25. As part of the Advanced Waste Treatment Implementation Plan, a Community Consultation and Engagement Plan will be prepared. This may require additional workshops and community engagement approaches as part of the implementation of the Master Plan.

Environmental

26. The Master Plan identifies the means to deliver diversion of waste from landfill of up to 95 per cent by 2030, well above the 'business as usual' projections. This level of diversion from landfill will avoid significant releases of greenhouse gas emissions. The Master Plan reiterates the City's position for prioritising cost effective reuse and recycling, and for only the remaining "non-recyclable" waste to be sent to an advanced waste treatment facility. This approach follows the existing waste management hierarchy and maximises the environmental benefits of the City's waste management practices.
27. The City of Sydney set targets of reducing greenhouse gas emissions across the entire LGA by 70 per cent below 2006 levels, and for the city to have capacity to meet up to 100 per cent of electricity demand by local electricity generation, both by 2030. The 100 per cent local electricity demand to be met by 70 per cent from trigeneration and 30 per cent from renewable electricity generation.
28. Together with the reduction of greenhouse gas emissions associated with the use of the largely renewable energy resource provided in the Master Plan, up to 6.9 per cent reduction of greenhouse gas emissions across the City LGA can be achieved.
29. The Master Plan identifies that sufficient levels of largely renewable gas could be delivered to allow the replacement of 100 per cent of the City of Sydney's own fossil fuel natural gas consumption, including that for the planned trigeneration systems in the City's own facilities.

Economic

30. The Master Plan identifies that the delivery of substitute natural gas for energy usage in the city provides a low marginal social cost of greenhouse gas abatement. The projected price of natural gas has altered significantly in 2014, and this is expected to increase the value of substitute natural gas that could be delivered from waste.

31. The avoidance of the NSW waste levy is anticipated to reduce costs to the City of up to \$3.9 million per year by 2030, based on the 2013/14 waste levy value. The potential savings to City LGA businesses, should they utilise a facility as described in the Master Plan, are up to \$14.4 million per year based on the 2013/14 waste levy value. Economic modelling outlined in the Master Plan suggests that these savings will be off-set by increased waste processing costs, and hence the cost to the City would be similar to current waste disposal costs (on a "gate fee" basis).
32. The Master Plan proposes more efficient, reliable, sustainable and economic ways to produce and distribute renewable energy, which, if implemented, should result in cost savings to users through reduced costs of renewable energy, avoided network charges and reduced exposure to any direct or indirect price on carbon.

BUDGET IMPLICATIONS

33. Other than costs incurred for the public exhibition of the Master Plan, there are no further budget implications associated with the Master Plan. However, there are a number of enabling actions outlined in the Master Plan, which could have future financial implications for the City. In order for the City to implement these particular actions, approval from Council would be sought where required in accordance with existing financial delegation and approval processes.

RELEVANT LEGISLATION

34. The City is required by the Local Government Act 1993 to raise a charge for the reasonable cost of waste services provided. This includes collection, disposal or treatment systems.
35. The EPA released an Energy from Waste Policy in March 2014. This policy replaces the existing Guidelines for Non-standard Fuels with a set of criteria that allows for expanded opportunities for introducing energy from waste solutions. The Policy criteria permits the use of municipal solid waste and commercial waste as feedstock for energy from waste facilities, subject to emission limits and limits determined by associated waste collection and recycling practices.
36. The City's proposed Advanced Waste Treatment option can meet or address each of these criteria. Restrictions on feedstock permitted may require the City to adjust its waste collection practices or broaden the sources for waste input to include more commercial waste or waste from adjacent councils. These options have been included in the Master Plan, and discussions with the EPA have commenced.
37. Renewable energy is covered by the various Electricity, Gas and Renewable Energy Acts and the Clean Energy Act 2011. However, a new regulatory regime for renewable gas would enable the renewable gas to be tagged, and a gas purchase agreement entered into between the renewable gas generator and consumers in the same way as currently for renewable electricity.

PUBLIC CONSULTATION

38. The Master Plan findings were presented in a City Briefing to 120 external invitees on 15 May 2014, and in other public and industry presentations since then.

39. The draft Advanced Waste Treatment Master Plan was placed on public exhibition from 12 May to 25 June 2014 as outlined in the timeline below:

12 May 2014	Council approved public exhibition of draft Master Plan
12 May to 25 June 2014	'one to one' briefings/consultations with four key stakeholder organisations
15 May 2014	Public exhibition of Master Plan commenced
15 May 2014	City Briefing, Town Hall
17 May 2014	Advertised in The Sydney Morning Herald
21 May 2014	Advertised in Central Sydney Magazine
3 June 2014	Community Reference Group Workshop 1 – Redfern Oval Community Room
10 June 2014	Community Reference Group Workshop 2 – Redfern Oval Community Room
11 June 2014	CEO notification email letter sent to 136 contacts
25 June 2014	Public Exhibition closed

40. The documents were made available on the City's website and hard copies were also exhibited and available at the Town Hall House One Stop Shop and all Neighbourhood Service Centres.
41. The exhibition of the draft Master Plan was advertised in The Sydney Morning Herald and Central Sydney Magazine, with 136 notice letters sent by email to key stakeholders in government, peak environmental groups, industry groups and associations, and members of the Better Buildings Partnership.
42. Council approved the public exhibition of the draft Advanced Waste Treatment Master Plan at its meeting on 12 May 2014, with a requirement for two Community Reference Group Workshops during the public exhibition period.
43. The feedback from the Community Reference Group Workshops has been compiled into two reports, one for each workshop, and these reports are included at Attachment C.
44. Key stakeholders were consulted as part of the public exhibition process, including the two Community Reference Group Workshops, briefings, media and other communications as outlined below.
45. A discussion on the content of the City's Master Plan as part of a seminar panel run by industry on Energy from Waste was held on 18 June 2014 to an audience of 58 industry, consultancy and local government stakeholders.
46. Ongoing consultation and approvals will be required when actions identified in the Master Plan are implemented.

Community Reference Group Workshops

47. Two Community Reference Group Workshops were held on 3 and 10 June 2014 at the Redfern Oval Community Centre.
48. The meetings provided an opportunity for randomly selected participants to understand the issues and research, hear directly from the City's experts, ask questions and provide structured feedback for consideration by the City.

49. Fourteen community members participated in the workshops in Redfern, which allowed for in depth deliberation and discussion.
50. The issues discussed in the workshops included the need for considering Advanced Waste Treatment, loss of landfill capacity, preserving recycling, use of technologies internationally, the benefits of the City's proposed technical solution, the importance of locating a facility, the impact on the community and the future strategies for managing waste and recycling across the City LGA.
51. Of the issues raised during the workshops, the City garnered specific community comments on the criteria that would need to be addressed regarding the selection of an appropriate site for locating a facility. The criteria most important to participants were:
 - (a) Proximity to the source of the waste – participants thought that a facility closer to the source of wastes would minimise the impact zone, and would reduce transport costs, emissions, road damage, and traffic noise. Preferences were indicated for the facility to be located within the city boundaries. However it was highlighted that distance to residential areas would also need to be considered;
 - (b) Transport access – participants indicated a preference for sites that could, if feasible, be accessed by rail. There was some concern around trucks traveling through suburbs, and it was noted that a 'pathway of least impact' should be considered in order to minimise impacts on residential areas;
 - (c) Noise and odour pollution – it was suggested that the facility should be located where noise and odour impacts on residents could be minimised, and preferably unnoticeable. It was also suggested that operating hours of the facility would need to be taken into consideration in determining the potential impacts of noise and odour; and
 - (d) Aesthetics – participants thought that the facility should be attractive, landscaped, and become an integrated part of the local area.
52. Other location criteria raised in the workshops included:
 - (a) effects on traffic;
 - (b) planning zones;
 - (c) price of land;
 - (d) anticipating future urban changes;
 - (e) away from rivers and the sea; and
 - (f) generating jobs in areas of high unemployment.
53. These criteria were reflected in the success criteria developed by the City for Enabling Action 1, and will be used to inform the Advanced Waste Treatment Implementation Plan following adoption of the Master Plan.

Sydneyoursay.com.au

54. The dedicated green infrastructure page at: SydneyYourSay.com.au/greeninfrastructure recorded the following activity for the period 15 May to 25 June 2014:
- (a) 1,099 site visits;
 - (b) 1,324 page views;
 - (c) 885 unique visitors;
 - (d) 7 video plays – Advanced Waste Treatment video;
 - (e) 36 downloads of the Master Plan;
 - (f) 73 downloads of the Advanced Waste Treatment fact sheet; and
 - (g) 135 downloads of the Advanced Waste Treatment infographic.

Submissions

55. Council received 15 submissions or other feedback from the individuals or organisations listed below in response to public exhibition of the draft Master Plan:
- (a) Individual A;
 - (b) Individual B;
 - (c) Individual C;
 - (d) Individual D;
 - (e) Individual E;
 - (f) Waste Management Association – NSW Energy from Waste Subgroup;
 - (g) Southern Sydney Regional Organisation of Councils;
 - (h) Office of the NSW Small Business Commissioner;
 - (i) Total Environment Centre;
 - (j) Sydney Water;
 - (k) Plastic Forests Pty Ltd;
 - (l) SITA Australia Pty Ltd;
 - (m) New Energy Corporation Pty Ltd;
 - (n) NSW Environment Protection Authority;
 - (o) The University of Sydney; and
 - (p) Community Reference Group Workshops feedback.

56. A summary of the submissions received and responses to the issues raised are set out in Attachment A. Issues raised relate to:
- (a) locating a facility;
 - (b) providing sufficient waste to make a viable contract;
 - (c) the need to ensure the city's recycling levels are maintained;
 - (d) generating a clean syngas, suitable for substitute natural gas conversion;
 - (e) the maturity of gasification technologies;
 - (f) the inclusion of commercial waste and/or other waste streams in the process; and
 - (g) the need to address the provisions of the NSW Energy from Waste Policy Statement.
57. The following statements in support of the Master Plan were made in submissions received:
- (a) The Waste Management Association of Australia Energy from Waste NSW subgroup "welcomes the City's progressive approach to waste management and the recognition that energy from waste can play an important part in the processing of the residual waste stream."
 - (b) The Southern Sydney Regional Organisation of Councils states "the Master Plan offers significant opportunities for the Southern Sydney region."
 - (c) "The Office of the Small Business Commissioner supports the proposed introduction of an Advanced Waste Treatment facility to reduce the costs of waste disposal."
 - (d) Sydney Water states "the Draft Advanced Waste Treatment Master Plan presents an exciting vision and commitment to a more sustainable future for Sydney."
 - (e) "SITA believes Energy from Waste (EfW) facilities will play an essential role in future efforts to reduce waste and increase resource recovery."
 - (f) "New Energy is excited by the vision and leadership the City has shown in putting together this Plan and will be actively supporting the goals from its position in the Energy from Waste sector."
 - (g) The NSW EPA states that "the use of non-recyclable waste that would otherwise end up in landfill as proposed in the Advanced Waste Treatment Master Plan is consistent with the EPA's NSW Energy from Waste Policy Statement."
 - (h) "The University of Sydney welcomes the strategic approach taken by the City to address its resource recovery, waste management and carbon emissions challenges. The high ambition level set by the City is commendable."

PROPOSED AMENDMENTS TO THE MASTER PLAN

58. The proposed amendments to the Master Plan are set out in Attachment B.
59. The final Advanced Waste Treatment Master Plan is provided in Attachment D.
60. The proposed amendments to the Technical Appendix are set out in Attachment B. These amendments relate to the alterations to the data for the Low Temperature Scenario of the Gasification Technologies Review, where the reference facility was altered from APS to Entech to accommodate closure of the APS reference facility and the preference to use the Australian developed technology of Entech as a reference facility. The amendments address feedstock criteria and emissions results. The amendments improve but do not substantially alter the major strategic findings of the Technical Appendix in relation to the preference for technologies that can deliver high waste diversion and a refined syngas suitable for substitute natural gas upgrade.
61. The proposed amendments improve but do not substantially change the strategic directions of the exhibited draft Master Plan.

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