

NSW EPA Draft Waste and Circular Infrastructure Plan

Hunter Joint Organisation submission – June 2025

Introduction

The Hunter Joint Organisation (Hunter JO) is the statutory local government entity established by the NSW Government, under the *NSW Local Government Act 1993*, to support the ten member Councils of the Hunter Region to work together for better rural and regional outcomes, and to enhance the way local and state governments work together to plan and deliver important regional infrastructure and investment.

Member Councils of the Hunter JO are:

- Cessnock City Council
- Dungog Shire Council
- Lake Macquarie City Council
- Maitland City Council
- MidCoast Council
- Muswellbrook Shire Council
- City of Newcastle
- Port Stephens Council
- Singleton Council
- Upper Hunter Shire Council

The Hunter JO also serves as the voluntary regional waste group under the NSW EPA's [Regional Networks for Effective Waste Management \(RENEW\) program](#), which is comprised of the ten Member Councils, as well as Central Coast Council.

The Hunter JO welcomes the opportunity provided by the NSW EPA to provide feedback on Chapter 1 of the Draft Waste and Circular Infrastructure Plan (the Draft Plan). The submission has been developed in consultation with the waste managers of the Hunter JO's member councils, although does not necessarily encompass the complete view of each council. The individual councils may also make independent submissions.

We are pleased to see the release of the Draft Plan and are supportive of the EPA taking a leading and active role in the delivery of critical waste and resource recovery infrastructure. As mentioned in the Draft Plan, this work is particularly important to address the looming "landfill crisis" in Greater Sydney and the approaching Food Organics Garden Organics (FOGO) diversion mandate. Similarly, planning and investment in strategic infrastructure is essential to achieve the NSW Government's target of an 80% resource recovery rate by 2030 (Waste and Sustainable Materials Strategy, 2021) across all waste streams, and transition to a circular and low carbon economy.

We understand that while this initial chapter of the Draft Plan is largely concerned with landfill and FOGO infrastructure servicing Greater Sydney, subsequent chapters will be released later in 2025 with a focus on regional NSW and reuse and recycling infrastructure. We look forward to the opportunity to review those chapters when they are released.

Streamlining planning process to fast-track expansion of existing landfills

Overall, the Hunter JO supports the proposed actions to improve and streamline the development assessment process for applications to expand existing landfills. However, more detail will need to be provided about what qualifies as a “priority landfill” for the purposes of a streamlined assessment. Furthermore, we suggest that the actions to expediate the assessment of landfill expansion applications should apply beyond the landfills that service Greater Sydney. Waste infrastructure is critical to regional and rural areas of NSW as well, and planning complexity puts pressure on the limited resources of local government who often own and operate this infrastructure.

There are existing landfill sites across regional NSW, including the Hunter and Central Coast, that may have current or future capacity to process residual waste from Greater Sydney. These do not appear to have been considered in the capacity assessment presented in the Draft Plan. While it makes sense not to simply assume that alternate sites are willing and able to accept additional waste, **the Hunter JO encourages the EPA to engage with owners and operators of significant regional landfills** to understand the potential role these facilities could perform in addressing the expected shortages. Examples of significant sites within the Hunter and Central Coast region include the Buttonderry Waste Management Facility (Central Coast Council), and the Summerhill Waste Management Centre (City of Newcastle).

Building resilience by enabling planning for energy-from-waste

As outlined in our [recent submission on the NSW Energy from Waste Options Paper](#), the Hunter JO supports the NSW Government’s policy to enable the development of Energy from Waste (EfW) projects in regional NSW, particularly the Tomago Precinct within the Hunter region. Our view is that EfW can deliver better resource recovery and environmental outcomes than landfill for certain residual waste streams, and we consider it to be an important part of the future waste infrastructure mix.

However, the putrescible waste infrastructure capacity projections shown in Figure 4 of the Draft Plan relies heavily on the development of EfW projects that have not yet secured development consent. While the declaration of EfW permissible precincts will give confidence to project developers, there remains significant uncertainty about the length and cost of the development assessment process for proponents, a barrier identified for all waste infrastructure in the Draft Plan. Additionally, securing social license for EfW projects is a concern, as there is a perception amongst the community that these facilities present significant risks to environmental and human health.

The Hunter JO therefore encourages the EPA to support the development EfW projects to increase the likelihood that they will be successfully delivered to provide the processing capacity need identified in the Draft Plan. The establishment of an EfW precinct at Tomago must be supported by a robust environmental assessment and planning process that ensures appropriate and effective controls are put in place to manage impacts of this site on the surrounding environment and community. While we believe that locating the precinct within an existing industrial area is appropriate for this type of development, it will be critical to the success of the project to ensure that any impacts are mitigated, especially given the expected community

sensitivity to EfW and the proximity of the site to sensitive environmental areas including the Ramsar Convention listed Hunter Wetlands National Park. While we recognise the importance of robust development and environmental assessment processes to mitigate any impacts of EfW projects, the **NSW Government should also explore providing EfW proposals (in appropriate locations where social licence exists) with more streamlined planning pathway and/ or support services** similar to those that are earmarked in the Draft Plan for proposals to expand existing landfills. A focussed, streamlined, yet comprehensive planning pathway needs to commence soon in order to be ready for commencement in alignment with need. Secondly, **the NSW Government should lead community engagement and education activities, and fund local government engagement activity, to build the community's understanding of the role of EfW** in modern waste management, its benefits (especially compared to landfill), and how impacts can be controlled.

Finally, EfW projects should be complemented with **investment and support for the development of resource recovery infrastructure**. This will ensure valuable materials are not simply used as feedstocks for EfW but are diverted to a higher and best use, supporting the development of NSW's circular economy. We understand resource recovery and circular economy infrastructure will be addressed in subsequent chapters of the Draft Plan.

Strategic planning to meet the waste management needs of growing populations

The Hunter JO supports the NSW Government's actions to strategically plan for new waste infrastructure and protect existing waste infrastructure from the encroachment of incompatible land uses and developments.

Pressures on waste sites from urban and residential expansion are experienced, albeit to a lesser extent, in the Hunter region too. A good example is the Summerhill Waste Management Centre, a regionally significant landfill and resource recovery site that is owned and operated by the City of Newcastle. This site is being encroached upon by a planned and approved residential subdivision on the surrounding land¹, despite opposition from City of Newcastle on the grounds of inconsistency with modern planning policies². This development is likely to be sensitive to the impacts of the site's existing activities, such as odour and vehicle movements, and complicate the planned future expansion of the landfill and development of essential associated infrastructure, including improved road access. While it may be too late to prevent or alter this development, it exemplifies **the need to proactively protect significant waste infrastructure from incompatible land uses**. We would like to see the considered and addressed by the subsequent chapters of the Draft Plan that examine the needs of regional NSW.

We agree with the Draft Plan's identification of the need for strategic and whole-of-government planning and investment in new waste infrastructure, and we are pleased to see the NSW EPA and Property Development NSW (PDNSW) nominated as lead agencies responsible for coordinating this work. Modern, adaptive and suitably located infrastructure is needed to meet the community's waste management needs, and to increase recovery rates and circularity. However, a number of

¹ <https://newcastleweekly.com.au/summerhill-a-logical-sustainable-and-affordable-solution-nelmes/>

² <https://newcastle.nsw.gov.au/getattachment/77d306c8-2671-45a0-8d67-88eca7e834df/Item-7-2-Lord-Mayoral-Minute-HCCRPP-Winten-DA-Minmi.pdf>

challenges or barriers exist that are stopping or slowing the delivery of this infrastructure by councils and the private sector. For example, within the Hunter region, there is a dearth of available FOGO processing capacity and transfer infrastructure, with Remondis in Lake Macquarie being oversubscribed and Loop Organics in Singleton being too far from the metropolitan areas of the Lower Hunter, meaning no commercial organics collection is available. While several projects are planned, none are confirmed nor are they likely to be operational prior to the commencement of the business FOGO mandate in 2026. MidCoast Council are in the process of developing a significant 95,000mt FOGO processing facility at Tuncurry, but this will not be ready until 2027. Another example is that in the Upper Hunter, resource recovery services are often not available or not financially viable for councils. Aggregation and transfer infrastructure could help overcome these barriers. The NSW Government could facilitate the development of this infrastructure through the identification and/ or supply of land, financial support, and coordination of stakeholders including councils, services providers, and infrastructure developers.

We encourage the NSW Government to **consider the waste infrastructure needs of regional NSW in the subsequent chapters of the Draft Plan and provide similar support to the regions as is being suggested for Greater Sydney.** This could include:

- Analysing the current and planned infrastructure capacity and any gaps.
- Identifying and supplying land for significant infrastructure, with a focus on the adaptive reuse of mine sites as operations wind down.
- Continuing to invest in regional coordination through programs like the Regional Capacity Support Program (RCSP)³, to provide a mechanism for council waste teams to work collaboratively.
- Reinvesting an equitable portion of the waste levy into infrastructure development and procurement support in regional NSW.

Overall, the Hunter JO is supportive of the NSW EPA's efforts to improve the strategic delivery of waste infrastructure across NSW. We appreciate the opportunity to comment on this initial chapter of the Draft Plan and look forward to the release of the subsequent chapters, including a focus on regional NSW. We encourage the NSW EPA and their NSW Government colleagues to engage regional councils as a part of this process.

Should you have any further queries please don't hesitate to contact Chris Dart, Circular Economy Program Lead, Hunter JO at chrisd@hunterjo.nsw.gov.au or on 0460 038 197.

Yours Sincerely



Cr Sue Moore
Mayor, Singleton Council
Chair Hunter Joint Organisation

³ <https://www.epa.nsw.gov.au/Your-environment/Waste/local-council-operations>