

Mr Chris Ritchie
Director, Industry Assessments
Department of Planning and Environment
GPO Box 39
Sydney
NSW 2001

22 May 2018

Dear Mr Ritchie,

Eastern Creek Energy from Waste Facility (SSD 6236)

The Independent Planning Commission seeks additional information to assist with its determination of the above proposal.

Please find attached to this letter a series of questions for the Department of Planning and Environment, to which the Commission requests a response.

The Commission would appreciate a response by no later than **1 June 2018**.

The Commission also invites the Department to provide comments to the applicant's response to the Department's Assessment Report, which was provided to the Department on 21 May 2018.

Should you wish to discuss any of the questions raised please do not hesitate to contact David Koppers – Team Leader.

Yours sincerely,



David McNamara
Director, Secretariat
Independent Planning Commission

Questions for the Department of Planning and Environment

- Is the shutdown process proposed by the applicant international best practice?
- Please provide a background on the necessary 'safety margin' that EnRisks has assumed in its report (Table 13) in addition to the modelled Human Health Risk Assessment and Air Quality Impact Assessment outcomes. Are there other similar jurisdictions that have adopted similar (or other) levels of safety margin?
- In addition to the potential Human Health Risk Assessment and Air Quality Impact Assessment outcomes, and scenarios 2 and 5, are there any other actual known health and/or air quality outcomes? Is there some data to support EnRisks' 'safety margin' assumptions?
- Please provide further explanation as to why the Department considers Ferrybridge to be an inappropriate 'reference facility', particularly in reference to the composition of the feedstock (refer to Table 4 on page 5/8 of ERM's response in Appendix C, from the applicant's additional information dated 21 May 2018).
- Does the Department assume that feedstock is diverted from higher use priorities? Is it assumed that the plant would run at full capacity even if insufficient 'appropriate' feedstock is available?
- Can the EPA confirm that the landfill has or can be appropriately licensed to receive residual ash from the facility (including if it did contain floc)?
- Please provide a comparison of the greenhouse risks/benefits and overall impact on energy costs? Note that the Department acknowledges potential greenhouse gas savings from reduced volumes of residual waste being sent to landfill and the recovery of energy from waste).
- What constitutes international best practice in regard to waste stream quality assurance?
- Are there any disincentives to not burn more waste or conversely are there commercial incentives to burn waste?
- Is the scrubber technology input agnostic? i.e. does it perform the same role regardless of input materials?
- Are the Department and government agencies satisfied that the existing regulatory framework gives significant confidence that the project can be appropriately regulated if approved?