

Dear staff,

Our organisation has only become aware of the submission date for this process today so I will only make a brief but important statement on the process as time is limited given the three hour difference to EST.

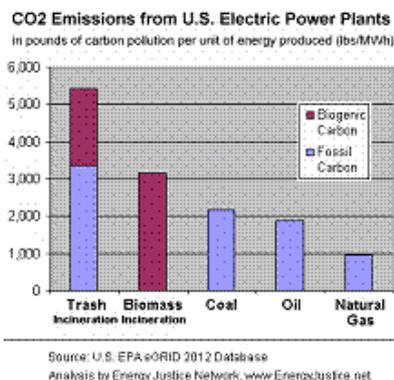
The Alliance for a Clean Environment (ACE) is a peak environmental justice NGO in Western Australia promoting Zero Waste practices and renewable energy.

Our organisation shares the view of many global scientists and international organisations that Waste to Energy incineration does not generate renewable or green energy largely on the basis that it relies on fossil fuels in the form of petro-chemical derived plastics for its feedstock.

The technologies included in the definition of incinerators by the EU regulators and the USEPA include gasification, pyrolysis, combustion and plasma arc.

Any waste burned in these processes for energy recovery destroys valuable biogenic resources that should be directed to composting and anaerobic digestion and contributes significantly to climate change.

Waste to Energy incineration has been labelled the dirtiest form of energy generation as it has been demonstrated to produce more CO<sub>2</sub> per unit of energy than coal or gas fired power.(see graphic below)



Burning biomass has also been suggested in some circles as a renewable form of energy that should receive accreditation. However new regulatory studies in the US and UK have exposed the poor carbon accounting behind the biomass burning claims and concluded that it does not qualify as a renewable energy source in the mid-long term due to its impacts on carbon sinks and displacement of the timber recycling industry feedstock.

ACE would therefore like to make it clear that it does not support the inclusion of Waste to Energy incineration in The National GreenPower Accreditation Program in the form of waste burning or biomass burning.

ACE is strongly opposed to these technologies receiving renewable energy funding or subsidies that should be directed to real renewable energy technologies such as PV, wind, wave and solar thermal.

There is a massive political push across the country to force waste to energy into the power generation mix under the guise of renewable energy. Other countries such as France are dismantling their waste incinerator inventory as they have realised they are polluting and undermine recycling and other sustainability objectives.

To this end we believe that the The National GreenPower Accreditation Program should not be fully harmonised with the LRET and further we believe that both WTE incineration and biomass incineration should be removed from the LRET.

Sincerely,  
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Senior Adviser  
Alliance for a Clean Environment