

27th March 2015

**GreenPower Program Review Submission
Public Consultation Paper, February 2015**

greenpower.admin@trade.nsw.gov.au

To whom it may concern

We have only just become aware of the ISF **GreenPower Program Review** and do not have time to comment on the document as a whole. We do however have specific comments in relation to references made to **waste to energy (WTE)**.

Page 24 of the document says:

“In general, eligible Generators under GreenPower align with eligible generators under the LRET, but there are some exceptions. For example, waste to energy technologies are not accepted under the GreenPower Program”.

Page 40 of the document says:

“At present, waste to energy is a generation technology that is eligible under LRET but not eligible to generate GreenPower. Stakeholder views are sought on revising this exclusion and aligning the LRET and GreenPower eligibility rules”.

Our view

Our view is that waste to energy should continue to be excluded from GreenPower eligibility rules and that it should no longer be eligible under LRET either.

‘Waste to energy’ encompasses a wide range of technologies, none of which have been explored in the document. For instance, no distinction is made between incineration and non-incineration waste to energy technologies in this document.

It is the view of many NGOs internationally and scientists globally that WTE should not be considered renewable energy, due to the fossil fuel content of municipal solid waste incinerators and poor carbon accounting for biomass burners.

We have attached a detailed report we recently published about waste to energy incineration and would be happy to provide further details upon request.

Yours sincerely

Jo Immig
Coordinator