

Clean Economy Jobs Bill 2024

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Clean Economy Jobs, Resources and Transport Committee Parliament House
George Street
Brisbane Qld 4000
By email: cejrtc@parliament.qld.gov.au
06/03/2024

Dear Committee Secretary

Inquiry into the Clean Economy Jobs Bill 2024

On behalf of ResourceCo Energy, please accept our submission to the Inquiry into the Clean Economy Jobs Bill 2024.

Founded in Adelaide and Australian-owned, ResourceCo is a global leader in the recovery and re-manufacturing of primary resources, extracting maximum value from materials otherwise destined for landfill, working in four sectors – energy, recycling and waste, soil reuse and recycling, and tyre recycling.

ResourceCo has an established and growing presence in Queensland. ResourceCo is constructing a resource recovery facility (RRF) at Hemmant in the Lytton electorate, with the support of a grant from the Queensland Government's Resource Recovery Industry Development Program (RRIDP), and it has secured an approval for an energy recovery facility (ERF) adjacent to the RRF. The ERF has been developed in accordance with the Waste from Energy guidelines released by the Queensland Government in late 2021 and is the only plant approved under the guidelines.

The Queensland Parliamentary Transport & Resources Committee visited ResourceCo's RRF site in January 2024, post ResourceCo's 2023 submission to the Committee as part of the Energy (Renewable Transformation and Jobs) Bill 2023.

The ERF would use Process Engineered Fuel (PEF), a largely biogenic feedstock that mainly consists of residual timber, paper, plastic and cardboard waste produced from dry construction and demolition (C&D), and commercial and industrial (C&I) waste materials.

The 14-megawatt ERF will generate renewable electricity for export to electricity distribution network and nearby industry; with 70% derived from renewable biomass.

The ERF will divert approximately 130,000 tonnes of waste from landfill and provide an overall carbon emissions reduction of 100,000 tonnes of CO₂-e each year. It will create 260 direct and 290 indirect jobs during construction phase and up to 20 operational jobs.



Queensland Energy and Jobs Plan and *Clean Economy Jobs Bill 2024*

ResourceCo commends the Queensland Government on the development of the Clean Economy Jobs Bill 2024 and its commitment to the following:

- *Reduce Queensland emissions to 30 per cent below 2005 levels by 2030*
- *Reduce Queensland emissions to 75 per cent below 2005 levels by 2035*
- *Achieve net zero Queensland emissions by 2050*

Through its legislation – the Clean Economy Jobs Bill 2024, the Government is legislating the emissions reduction targets and providing the necessary structure and market confidence to allow the private sector to continue to view Queensland as a priority state for investment.

Queensland’s 2035 Clean Economy Pathway:75% by 2035 (epw.qld.gov.au):

- ***Climate action is a jobs opportunity for all Queenslanders***
 - ResourceCo is creating jobs in Queensland via development of our resource recovery and energy recovery facilities that significantly reduce emissions via landfill diversion and producing renewable energy
- ***Decarbonisation generates investment throughout the economy***
 - Although decarbonisation does generate investment, other policy settings (such as waste levies) must work in unison with other government sector regulatory environments (i.e., environment and DES) to allow investment to occur. This requires significant consultation and coordination within government departments to allow viable pathways to achieve emissions reduction targets.
 - The legislated emissions reduction targets are a positive start, but the waste sector needs greater certainty (i.e., higher landfill levies) and a greater emphasis on the economic and environmental costs associated with methane emissions to allow waste to be diverted and importantly for private capital to flow more freely into the sector
 - There is a significant opportunity for the waste sector in Queensland to provide feedstocks to the Sustainable Aviation Fuel (SAF) and renewable diesel markets , however, as noted above, the regulatory settings require adjustment to encourage and nascent industries to grow and operate sustainable and profitable businesses
- ***Creating the jobs of the future economy***
 - As noted above, ResourceCo is creating jobs in Queensland via soil re-use and recycling, resource recovery and energy recovery developments. On average, the resource recovery sector generates 3 jobs to every 1 created in the landfill sector, as well as associated emissions avoidance and alignment with government targets
- ***Diversification and community resilience***
 - ResourceCo’s resource recovery operations provide all weather resilience to adverse conditions and increasing climate related events in Queensland. Our fully enclosed and weather protected operations allow the facility to accept waste streams in all weather conditions and process into alternative fuels, and recyclable commodities whilst diverting a minimum of 95% of waste from landfill and avoiding methane emissions in the process



- **Protecting the environment**

- ResourceCo's operations assist with environmental protection via landfill diversion and associated avoided emissions, recycling and recovery of waste materials that would have ordinarily been landfilled. The fuels that we produce also substitute fossil fuels (i.e. coal and gas) in high energy industrial applications such as cement kilns and energy plants and as feedstocks for renewable liquid fuels with associated reduced emissions

A key aspect of the pathway of the Clean Economy and Jobs Bill (2024) is the Queensland Energy and Jobs Plan (QEJP), and modelling attributes 20% of the 75% emission reduction by 2035 to the implementation of the QEJP.

Through its legislation – the *Energy (Renewable Transformation and Jobs) Bill 2023* – the Government is legislating the renewable energy targets, as well as public ownership targets and other pillars for delivery of QEJP's renewable energy transition. The Committee's report on the Bill, tabled on 1 March 2024, recognised ResourceCo representations:

- on the definition of “renewable energy source” to maximise the diversity of renewable electricity projects by adopting the more comprehensive list of eligible sources under the Commonwealth legislation through Section 17 of the *Renewable Energy (Electricity) Act 2000*: and
- to be inclusive of below 30-megawatt generation projects that can be advanced and be delivered against the QEJP renewable energy generation and public ownership targets.

Committee response – “renewable energy source” definition

On this issue, the Committee deferred to the Department of Energy and Climate's advice that: *“The Commonwealth definition of renewable energy was considered during development of the Bill, but not adopted as it would have unintentionally limited the inclusion of future renewable energy sources due to its more prescriptive nature. The definition of renewable energy source in Schedule 1 of the Bill is reflective of Queensland's existing renewable energy technologies and provides flexibility for additional sources to be prescribed by regulation. The Bill does not restrict the development of other energy sources in Queensland.”*

Section 17(t) of the Commonwealth legislation provides for, as the *Energy (Renewable Transformation and Jobs) Bill 2023* does, *“any other energy source prescribed by the regulations”*. Contrary to the Department's advice to the Committee, adopting the Commonwealth legislation definition would not “unintentionally limited the inclusion of future renewable energy sources due to its more prescriptive nature”, rather it would provide for more sources and more clarity in the legislation rather than adding through subsequent, subordinate regulation.

Specifically, ResourceCo seeks the addition from Commonwealth legislation of the inclusion of 17(j) wood waste and 17(q) biomass based components of municipal solid waste in the *Energy (Renewable Transformation and Jobs) Bill 2023*.



6 Meaning of certain energy sources that are eligible renewable energy sources (Act s 17)

biomass-based components of municipal solid waste means the biomass-based components of wastes that are directly sourced from, or eligible to be disposed of in, landfill or a waste transfer station that is licensed by a State or Territory government body or by a local government authority, but does not include biomass-based components of wastes originating from:

- (a) forestry or broadacre land clearing for agriculture, silviculture and horticulture operations; or*
- (b) fossil fuels.*

8 Meaning of wood waste

*(1) For section 17 of the Act, **wood waste** means:*

(a) biomass:

(i) produced from non-native environmental weed species; and

(ii) harvested for the control or eradication of the species, from a harvesting operation that is approved under relevant Commonwealth, State or Territory planning and approval processes; and

(b) a manufactured wood product or a by-product from a manufacturing process; and

(c) waste products from the construction of buildings or furniture, including timber off-cuts and timber from demolished buildings; and

(d) sawmill residue; and

(e) biomass from a native forest that meets all of the requirements in subregulation (2).

Examples for paragraph (b): Packing case, pallet, recycled timber, engineered wood product (including one manufactured by binding wood strands, wood particles, wood fibres or wood veneers with adhesives to form a composite).

Source: <https://www.legislation.gov.au/F2001B00053/2017-03-29/text>

To do so would be consistent with the Queensland Government's Energy from Waste Guidelines (2021) where it stated on page 3 that:

"The path to achieving a zero net emissions future includes a commitment to generate 50 per cent of Queensland's energy from renewable sources by 2030. Under the Commonwealth Renewable Energy (Electricity) Act 2000, energy derived from organic wastes may be regarded as renewable energy. This includes energy derived from wood waste, agricultural waste, food and food processing waste, biomass-based components of municipal waste, landfill gas, sewage gas, and biomass-based components of sewage. This type of energy is also referred to as 'bioenergy'. To the extent that electricity generated from waste meets this definition, it will contribute to the Queensland Government's commitment to reach 50 per cent renewable electricity generation by 2030. Energy derived from waste products made from fossil fuels (e.g. traditional plastics) does not count as renewable energy or bioenergy and would not contribute to the renewable energy target."



Committee response – sub-30MW generation projects

On this issue, the Committee report stated, “Although outside the scope of the Bill, we are supportive of the incorporation of small-scale renewables projects in the Bill as part of the progress towards meeting the Queensland renewable energy targets.”

The adoption of these recommendations would be to ensure Government-owned corporations, who will deliver the QEJP targets for renewable energy generation, will be able to choose from the maximum sources of renewable energy, including energy from waste assets that produce baseload renewable electricity in metro locations close to load requirements such as ResourceCo’s Hemmant based ERF development.

ResourceCo will discuss these recommendations with the Government as it finalises any amendments to the Energy (Renewable Transformation and Jobs) Bill 2023.

However, clarity on these issues, and the delivery of the Government's Waste Management and Resource Recovery Strategy, is relevant to the Clean Economy Jobs Bill 2024, not only to the emissions attributed to the QEJP, but additional emission reductions required to meet the to-be-legislated emission reduction targets.

Waste Management and Resource Recovery Strategy

ResourceCo notes that the *Clean Economy and Jobs Bill 2024* also requires Sectoral Plans (15%) to be developed as part of the pathway to a 75% emissions reduction realisation. ResourceCo encourages the Queensland Government to implement a waste sector plan to reduce methane emissions, encourage reuse and recycling, generate renewable energy and allow material contributions to the targets.

One of the key outcomes of the Government’s Waste Management and Resource Recovery Strategy, when it was released in 2018, was for the “*Reduction in waste-related greenhouse gas emissions.*”

Last year, the Government released a Draft Review Report and reiterated that “*effective waste management will support Queensland’s commitment to reduce net greenhouse gas emissions to zero by 2050.*” However, the review report stated, “*Data indicates that Queensland is on track to reach two out of nine of the 2025 milestone targets.*” Consultation on the Draft Review Report closed in May 2023.

The waste management and resource recovery sector is already contributing to emission reduction, through the reduction in emissions related to waste diverted to landfill. However, the sector can do more toward the proposed emission reduction targets of the Clean Economy Jobs Bill 2024 through a strengthened Waste Management and Resource Recovery Strategy, the underpinning measures such as the waste levy and delivery of the Recycling Jobs Fund as well as the inclusion of energy from waste as a renewable energy source and eligible to be counted to the renewable energy generation and public ownership targets of the companion *Energy (Renewable Transformation and Jobs) Bill 2024*.

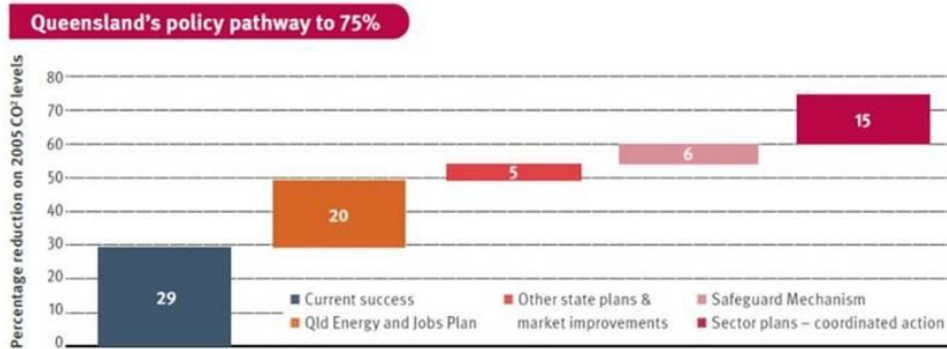


Figure 3

If ResourceCo can provide further information or clarification, please contact me via the contact details below. We would appreciate the ongoing engagement.

Henry Anning CEO - ResourceCo Energy Systems

[Redacted contact information]