

Environment Protection Authority

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ENVIRONMENT PROTECTION AUTHORITY

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Renewables, Climate and Future Industries Tasmania

GPO Box 147

Hobart TAS 7001

Via email only: bioenergy@treasury.tas.gov.au

To Whom in May Concern

ENVIRONMENT PROTECTION AUTHORITY (EPA) FEEDBACK ON THE DRAFT BIOENERGY VISION FOR TASMANIA PAPER

Thank you for the opportunity to comment on the draft Bioenergy Vision paper for Tasmania.

The EPA's contemporary environmental assessment, approval and ongoing regulatory framework under the *Environment Management and Pollution Control Act 1994* (EMPCA) supports bioenergy. The EPA is an integral part of Tasmania's Resource Management and Planning System, and a main statutory function is to further the sustainable development and environmental management and pollution control objectives of EMPCA. It continues to promote energy efficiency, waste minimisation and recycling, and resource use efficiency. The EPA provides in-principle support for the bioenergy vision, and make these comments:

- The draft paper promotes the concepts of bioenergy and is high level. It identifies potential barriers the EPA are aware of such as lack of understanding and investment, and the dispersed nature of the organic waste streams which may serve as feedstocks for bioenergy. The paper correctly identifies a key issue of surety of feedstock quantity and quality as impediments to further development of bioenergy.
- The Tasmanian examples included in the appendix are single point activities using what was otherwise a waste material from their own or a nearby operation. How a bioenergy market would interact with the existing organic waste sectors is yet to be determined, and the EPA already see competition between direct to land versus composting reuse activities on price and feedstock. The need to have a consistent feedstock may require bioenergy producers to pay for waste or take it at very low cost - the current direct to land and compost activities are driven by gate fees for taking the waste.
- There is potential for domestic market overlap – for example, the draft Tasmanian Renewable Hydrogen Action Plan has similar goals, aims and objectives to bioenergy, such as reducing Tasmania's greenhouse gas emissions and facilitating large scale development projects across energy, transport and agriculture sectors. Encouraging one area of renewable energy production may be at the expense of other renewables in terms of government support and funding. Broader consideration of how and what renewable energy projects will be prioritised should be analysed by Renewables, Climate and Future Industries Tasmania. This is so that proponents have clarity and detail about the viability and sustainability of future projects.

- So far as Tasmania's regulation for bioenergy development, the EPA would most likely assess and regulate any bioenergy plant or facility of scale as a level 2 activity under EMPCA either as an anaerobic digester, a chemical works or a fuel burning activity. The EPA currently regulate these types of activities. However, they are generally ancillary to some other activity such as sewage treatment, abattoir or saw milling etc. Future bioenergy projects do not present a significant challenge to the EPA in terms of assessment, approvals or regulation. The EPA continues to encourage open and early communication with future proponents for any project and the EPA will continue to assess, approve and regulate each project on best practice standards and legislative requirements under EMPCA.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Wes Ford', written in a cursive style.

Wes Ford

DIRECTOR, ENVIRONMENT PROTECTION AUTHORITY