

# SUBMISSION

**To:** NSW Environment Protection Authority (EPA)  
**From:** BINGO Industries  
**Subject:** **NSW EPA Climate Change Policy and Action Plan 2022-2025**  
**Date:** 3 November 2022

## 1.0 Introduction

- BINGO Industries (BINGO) welcomes the opportunity to provide feedback to the NSW EPA draft Climate Change Policy and Action Plan 2022-2025.
- BINGO is a recycling and circular economy leader in the state and steward for positive change in the industry.
- BINGO processes over two million tonnes per annum of mixed waste materials that would otherwise be landfilled, making a significant contribution to achieving state recycling and carbon reduction targets.
- In the last five years, we have invested almost \$1 billion in recycling assets and infrastructure, and we have a pipeline to invest hundreds of millions more in NSW over the coming years, providing the policy settings and regulatory environment is suitably attractive for us to do so.
- BINGO is majority owned by Macquarie Asset Management (MAM). MAM is one of the world's leading alternative asset managers, with over \$204 billion in assets under management. As a result, BINGO's strong balance sheet has been further enhanced by MAM.
- Our investment in recycling assets is a major creator of jobs. For every 10,000 tonnes of waste that is recycled, 9.2 jobs are created, compared with 2.8 jobs if that same waste is sent to landfill.<sup>1</sup> For example, BINGO officially commissioned its newest recycling facility MPC2 at our Eastern Creek Recycling Ecology Park (REP). The first stage of development of the REP generated over 400 construction jobs and an additional 200 jobs once operational and has cost in excess of \$140 million.
- BINGO is strongly aligned to the vision and targets outlined in the *NSW Waste and Sustainable Materials Strategy 2041*, the EPA's *Waste Delivery Plan* and the EPA's *NSW Strategic Plan*. BINGO has achieved industry leading recovery rates of 80%, exceeding the NSW Government's 2030 target of achieving 80% average resource recovery from all waste streams, and have invested to enhance this to above 90% by 2025.
- BINGO is on track to powering our facilities on 100 per cent renewable electricity by 2025 in line with our commitment to RE100 and has committed to reducing our emissions by 50 per cent by 2030. Further, we have committed to operating a net zero business by 2040, which is over and above NSW Government's target of achieving net zero by 2050.

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<sup>1</sup> <https://www.dcccew.gov.au/environment/protection/waste/publications/employment-waste-management-and-recycling>



- BINGO notes that the draft climate change policy (**CCP**) and draft climate change action plan (**CCAP**) include a range of new and continuing actions to support regulated industries to reduce emissions and build resilience to climate change risks.
- However, we note that in terms of suggested new actions, there is further detail and clarity required by operators, to ascertain impacts on business operations. Additionally, more detail around the implementation timeframes and types of assistance provided by the EPA to industry would be welcomed to help operators prepare and plan for intended changes.

## 2.0 Draft Climate Change Policy

- BINGO acknowledges the EPA is seeking to provide clear expectations for regulated industries and has committed to a staged approach to help achieve the Government's emissions targets.
- We share the EPA's vision in the draft **CCP**, that acting on climate change presents an immense opportunity to secure long term prosperity for our economy and local communities, and a desire to collaborate and work with the NSW Government to develop appropriate regulatory and policy frameworks to help address key challenges, particularly the key trends noted in the NSW State of the Environment (SoE) 2021 report.
- BINGO is committed to working with the NSW Government to achieving this target and working with broader industry, local communities, and all levels of Government to improve regulatory settings to achieve circular economy principles and addressing climate change risks, including reducing greenhouse gas emissions in line with the Government's net zero targets, which are:
  - A 50% reduction in emissions by 2030, compared to 2005 levels.
  - net zero emissions by 2050.
- As noted in the introduction, BINGO is already taking several steps to reduce its emissions footprint, including powering our facilities on 100 per cent renewable electricity by 2025 in line with our commitment to RE100 and a commitment to reducing our emissions by 50 per cent by 2030. Further, we have committed to operating a net zero business by 2040, which is over and above NSW Government's target of achieving net zero by 2050.
- An area that requires further clarity and consultation with the industry, is how the **CCP** and the **CCAP** will be measured and enforced, particularly if there are risks in the market to achieve a net zero economy.
- The recent Federal budget forecasts noting rising global economic uncertainty, high inflation and energy costs, strained supply chains and other climate change factors could place significant pressures on businesses, particularly manufacturing industries to compete and adapt its operations to reduced greenhouse gases (GHG) and transition to a net zero and circular economy.



### Recommendation 1

- We would welcome further clarity, support and industry consultation with the EPA and the NSW Government, on the management and mitigation of rising local and global economic risks in the net zero transition through **New Action 10 “encourage and support our regulated community to innovate”**.
- Due to rising business costs, we would recommend that a single and overall climate change reporting framework is adopted by NSW Government (that is also in harmony with Commonwealth standards), rather than individual Departments and agencies having their own checklists and reporting mechanisms.

## 3.0 Draft Climate Change Action Plan

- BINGO recognises that the draft **CCAP** outlines the EPA’s approach to build on existing and new NSW Government policy and action on climate change. Principally, we welcome the EPA noting that it intends to support regulated industries to address climate change.
- As outlined in the Introduction, in relation to the 14 new climate change action items, BINGO notes more detail is required on impacts on industries, particularly when it comes to compliance and reporting frameworks and potentially noting any duplicated activities that could be avoided.
- These new actions will increase the administrative burden of holding an Environment Protection Licence (EPL). Key new actions with potential duplication in the **CCAP** include:
  - **New action 1 - Support EPA officers to make climate-change-related decisions.**
  - **New action 2(c) - Partner with DPE to seek to ensure climate change is being adequately addressed by proponents of activities we will regulate, and that approvals contain appropriate conditions.**

### Recommendation 2

- It will be useful for BINGO and the broader industry to understand the basis for these decisions for operational compliance and planning review matters. We suggest guidance material for industry is provided on how and why EPA officers will make climate change related decisions, including any additional powers afforded to EPA officers under any relevant legislation. This is important, as it is currently not reflected in the NSW EPA Regulatory Strategy and for business like BINGO, helps plan and prepare for key development proposals and modifications.



- **New action 2(b) - Progressively require and support our licensees to prepare, implement and report on Climate Change Mitigation and Adaptation Plans.**

#### **Recommendation 3**

- BINGO requests further detail on this approach, particularly on the intended reporting timeframe and detail to report on the Climate Change Mitigation and Adaptation Plans (i.e. – is the reporting timeframe required every five years). Additionally, to avoid duplication, BINGO requests the EPA to identify existing documents or strategies, industry could report on its mitigation and adaptation plans. For example, through business's existing documents like Pollution Incidents Response Management Plan (PIRMP), Environmental Management Plan (EMP) and Decarbonisation strategy.

- **New action 7 – Develop a series of greenhouse gas emission reduction targets and related pathways for key industry sectors we license, to help guide our regulatory effort.**
- **New action 9 – Progressively place greenhouse gas emission limits and other requirements on licences for key industry sectors**

#### **Recommendation 4**

- BINGO has developed a Decarbonisation Strategy which meet or exceed the NSW Government greenhouse gas emission reduction targets. If a business, like BINGO has developed such a plan, this could be supplied to the EPA for consideration rather than drafting a separate plan/strategy to support the EPA's regulatory effort. We recommend the EPA consider such an approach, which would save industry operators time and resources developing a separate plan.

#### **Recommendation 5**

- BINGO recommends the EPA provide clear and reasonable timeframes around the introduction of such limits. We would ask this is done in consultation with industry. This is critical to ensure businesses can plan and prepare, by undertaking the appropriate economic, planning, and operational reviews.

#### **Recommendation 6**

- From a broader perspective, BINGO would recommend further risk analysis is undertaken by the EPA to determine if these suggested new actions in the EPA format are required, particularly if there are already existing International and Commonwealth reporting standards that require businesses to provide GHG data, controls and adaptation plans to achieve certification.



- Additionally, the CCAP calls for EPL holders to better prepare for climate change weather patterns, like floods and drought. Respective new actions include:
  - **New action 2(d): Require and support all our licensees to specifically consider how a changing climate might increase their risk of pollution incidents and require them to update their pollution incident response management plans accordingly.**

#### Recommendation 7

- We welcome further clarity and discussion with the EPA and the NSW Government on what is considered the threshold for EPL holders to consider updates to the PIRMPs. We welcome the opportunity to collaborate with the EPA to gain a deeper understanding of how a changing climate will impact our business and wider industry. For example, for the EPA to undertake regional climate mapping exercises to forecast the potential increase in flood risks to licenced facilities and potential mitigation/adaptation measures.

- **New Action 8/New Action 13: Prepare or adopt climate change mitigation guidance for key industry sectors we licence, including the performance outcomes we seek.**

#### Recommendation 8

- We recommend the EPA consult with industry to ensure the performance outcomes are appropriate and achievable (timeframes and extent of outcomes) for the industry to meet.

## 4.0 Conclusion

- The key new action items highlighted in this submission will increase the administrative burden for businesses like BINGO. We would welcome further detail for these items, including appropriate guidance and implementation timeframes.
- BINGO would welcome further discussion on the EPA's draft Climate Change Policy and draft Action Plan, through appropriate industry consultation forums and other channels. Additionally, we welcome further collaboration with the EPA and the NSW Government in helping achieve a transition to a circular economy.

