

## WCRA's Responses to Supplementary Question 1

### **Inquiry into Proposed Energy from Waste Facilities Public hearing – 15 December 2025**

The Waste Contractors and Recyclers Association of NSW (WCRA) thanks the Committee for the opportunity to provide further information in response to questions arising from the public hearing held on 15 December 2025.

WCRA's response to supplementary question 1 is set out below.

#### **Question 1**

#### **If emissions exceed limits at waste to energy facilities, what consequences would the Waste Contractors and Recyclers Association consider appropriate?**

WCRA notes that the regulatory framework governing emissions exceedances is already established under the *Protection of the Environment Operations Act 1997* (POEO Act) and associated Environment Protection Licence (EPL) conditions administered by the NSW Environment Protection Authority (EPA).

The POEO Act provides the EPA with comprehensive enforcement powers, including investigation, directions, penalties and other enforcement actions where non-compliance occurs. EPL conditions also specify monitoring, reporting and incident notification requirements, including requirements to report pollution incidents and licence exceedances.

WCRA considers that the EfW sector should be regulated consistently with other EPA-licensed heavy industries operating in New South Wales, including sectors such as power generation and large-scale industrial processing facilities.

Accordingly, WCRA supports the application of existing POEO Act enforcement provisions and EPL compliance requirements to EfW facilities. This ensures that any emissions exceedances are managed through established statutory and licensing mechanisms, including incident notification, regulatory oversight, corrective action and enforcement where required.

WCRA also supports regulatory settings that require best available technology, continuous emissions monitoring, independent verification and transparent reporting, to ensure exceedances are rapidly identified and addressed.

## WCRA's Responses to Supplementary Question 2

### Inquiry into Proposed Energy from Waste Facilities: Public hearing – 15 Dec 2025

The Waste Contractors and Recyclers Association of NSW (WCRA) thanks the Committee for the opportunity to provide further information in response to questions arising from the public hearing held on 15 December 2025.

WCRA's response to supplementary question 2 is set out below.

#### **Question 2: What evidence or formal risk assessment informed the decision to remove recommendations for precautionary environmental monitoring, particularly in agricultural regions?**

WCRA did not intend to step away from environmental assurance. The paragraphs removed from the updated submission were highly prescriptive examples of potential monitoring approaches and were considered too detailed for the purposes of the inquiry record. Their removal does not reflect a change in WCRA's position that environmental monitoring must be robust and appropriate to site-specific risk.

The updated submission reflects WCRA's view that environmental monitoring requirements are most appropriately determined through established New South Wales environmental assessment and licensing processes, including environmental impact assessment, dispersion and deposition modelling, and Environment Protection Licence (EPL) conditions administered under the *Protection of the Environment Operations Act 1997* (POEO Act).

The POEO Act establishes a risk-based regulatory framework aimed at protecting, restoring and enhancing the quality of the environment and preventing or minimising pollution and environmental harm. Within this framework, monitoring and reporting requirements are determined based on site-specific environmental risk and potential exposure pathways.

Consistent with this approach, the updated submission reflects a transition from uniform, precautionary monitoring assumptions to a risk-based approach aligned with established regulatory practice. This recognises that exposure pathways, land use and receptor sensitivity vary significantly by location.

This approach also aligns with international regulatory practice, including under the European Union Industrial Emissions Directive, where modelling is used to identify realistic exposure pathways and inform targeted monitoring where required.

## WCRA's Responses to Supplementary Question 3

### Inquiry into Proposed Energy from Waste Facilities: Public hearing – 15 Dec 2025

The Waste Contractors and Recyclers Association of NSW (WCRA) thanks the Committee for the opportunity to provide further information in response to questions arising from the public hearing held on 15 December 2025.

WCRA's response to supplementary question 3 is set out below.

#### **Question 3: What specific peer-reviewed studies or independently reported monitoring outcomes were relied upon to support the assertion that international best-practice EfW facilities have demonstrated no measurable adverse health or environmental impacts?**

The evidence base supporting WCRA's position was provided in the appendices to WCRA's submission, including the health evidence summary contained in Appendix D.

This material included peer-reviewed literature and independent public health reviews relating to modern Energy from Waste facilities operating under contemporary regulatory standards. The studies and reviews referenced included work from organisations such as Public Health England, the UK Health Security Agency, Ghosh et al (Environment International), and research undertaken through the Imperial College London Small Area Health Statistics Unit, as well as peer-reviewed epidemiological studies examining health outcomes near modern municipal waste incinerators.

Collectively, these sources and others consistently conclude that modern Energy from Waste facilities designed, operated and regulated to best available technology standards do not result in measurable adverse population-level health outcomes.

These findings relate specifically to modern facilities operating under contemporary regulatory regimes and should not be interpreted as applying to legacy incineration technologies that pre-date modern emissions control systems and regulatory frameworks.



## WCRA's Responses to Supplementary Question 4

### Inquiry into Proposed Energy from Waste Facilities: Public hearing – 15 Dec 2025

The Waste Contractors and Recyclers Association of NSW (WCRA) thanks the Committee for the opportunity to provide further information in response to questions arising from the public hearing held on 15 December 2025.

#### **Question 4: What evidence supports the view that compliance-based emissions monitoring alone is sufficient to identify potential impacts in agricultural regions, where exposure pathways may include soil, water, livestock and produce?**

WCRA's position is that monitoring and environmental protection requirements for heavy industry in New South Wales are established and enforced by the NSW Government through the NSW Environment Protection Authority (EPA) under the Protection of the Environment Operations Act 1997 (POEO Act) and Environment Protection Licence (EPL) conditions.

Within this framework, the evidence base for determining whether additional monitoring is required in agricultural regions is established through site-specific environmental assessment, including dispersion and deposition modelling, baseline studies (where required), and assessment of local land use and exposure pathways. These processes are designed to identify whether pathways such as deposition to soil and water, impacts on livestock, or potential produce exposure are plausible and, if so, to inform appropriate monitoring requirements.

Consistent with NSW EPA regulatory practice and published air quality monitoring guidance and technical documentation, continuous stack emissions monitoring typically forms the foundation of compliance monitoring. Where site-specific risk assessment identifies potential off-site exposure pathways, EPL conditions can require supplementary monitoring (for example, ambient air monitoring or monitoring of other relevant environmental media and receptors) tailored to the location and the identified pathway risks.

Accordingly, WCRA supports a risk-based, pathway-based approach to monitoring design for EfW facilities in agricultural regions, applied through established POEO Act and EPL mechanisms in the same manner as other EPA-licensed heavy industries.

This risk-based monitoring approach is supported by international experience and independent health evidence relating to modern EfW facilities, as referenced in the appendices to WCRA's submission, which indicate no measurable adverse population-level health impacts when facilities operate in compliance with contemporary regulatory standards.