

# NSW Legislative Council Select Committee on Energy from Waste Facilities Response to Supplementary Questions

## Supplementary Questions from Members

- 1) *Could you please outline for the Committee what form of Indemnity Insurance and/or relevant compensatory mechanisms that your company has (or plans to have) in place if a primary producer's stock or produce are adversely affected by the emissions or operations from any of your proposed Energy from Waste Facilities?*

Parkes Energy Recovery (PER) is committed to ensuring that our operations do not adversely affect surrounding primary producers or the broader agricultural sector. Consistent with this commitment, PER is progressing a suite of commercial, regulatory and risk-management mechanisms that reflect industry best practice for large-scale infrastructure projects.

PER maintains insurance appropriate to the scale and nature of our business, and anticipates extending this cover to include operational-phase risk categories once the facility enters the construction and operational phases. Subject to approval, the facility would operate under an Environment Protection Licence (EPL) issued and overseen by the NSW Environment Protection Authority (EPA), which licence would be expected to impose strict conditions around emissions performance, monitoring, incident notification, and environmental harm.

In addition, the Parkes Energy Recovery project is being developed within the Parkes Special Activation Precinct (SAP), a NSW Government-led industrial precinct designed to ensure that environmental and regional impacts are appropriately identified, mitigated, and managed in advance of operational commencement. Regulatory settings applicable to SAP-based projects include mandatory environmental assessment processes, risk-based licensing, and ongoing EPA oversight, all of which contribute to reducing the likelihood of any harm.

Finally, PER is undertaking comprehensive environmental impact assessment studies – including air quality modelling, human health and agriculture impact assessments – as part of our forthcoming Environmental Impact Statement (EIS). These assessments are designed to demonstrate that emissions from the facility will not result in harmful offsite consequences that would affect livestock, produce, or surrounding land uses.



**2) PRC evidence relied on overseas EfW facilities as demonstrating safety and performance. Which specific facilities were relied upon, and what independently audited emissions or compliance data supports their use as comparators?**

Parkes Energy Recovery (PER) has referred to international Energy-from-Waste (EfW) facilities due to their long operational history, strong regulatory frameworks, and extensive emissions-monitoring programs.

These reference facilities operate in jurisdictions such as Switzerland, the United Kingdom, and the European Union, where emissions performance is regulated under well-established compliance regimes, including continuous emissions monitoring and independent auditing. This international dataset provides a robust evidence base demonstrating safe performance under advanced regulatory conditions.

PER will further detail comparator facilities and their emissions characteristics in our EIS, including audited emissions performance, regulatory compliance histories, and system design parallels with the Parkes proposal.

**3) Evidence referred to the Kwinana facility as an operational example. At the time that evidence was relied upon, was the Kwinana facility operating under full commercial conditions?**

At the time Kwinana Energy Recovery was referenced in PER's evidence to the Committee, we understood that the Kwinana facility was in the process of transitioning through commissioning stages toward full commercial operations. PER's reference to Kwinana was based on publicly available information regarding its operational progress, emissions-control systems, and regulatory approach.

While the Kwinana facility had commenced operations, it was understood at that time that certain elements might still be being within staged ramp-up phases. The reference was therefore intended to illustrate the facility's technological relevance, regulatory framework, and design comparability - not to imply that full commercial-rate operations had been fully achieved at the time the statement was made.

**4) What evidence supports the proposition that the operational and regulatory experience at Kwinana is directly transferable to the proposed Parkes facility?**

The relevance of the Kwinana experience to Parkes rests primarily on the similarity of core combustion and emissions control technology and applicable regulatory regimes. Both facilities draw on globally standardised EfW combustion and flue-gas cleaning systems supplied by internationally recognised technology providers.

Regulatory oversight in NSW through the EPA mirrors key aspects of WA's regulatory framework, including continuous emissions monitoring, licence conditions, operational reporting, and incident-notification requirements. As noted in our Scoping Report, environmental



assessment for the Parkes project also includes human health, air-quality, agriculture, and biodiversity components aligned with the approach used for comparable facilities.

These parallels support the general transferability of lessons from Kwinana, particularly in emissions management, operations, and regulatory engagement. Further technical evidence will be provided in our EIS.

**5) Evidence indicated that Kwinana did not involve a detailed human health risk assessment for the surrounding community. Why was a detailed human health risk assessment not undertaken, and has any post-commissioning assessment been conducted since?**

Parkes Energy Recovery (PER) is not involved in the Kwinana facility nor aware of the evidence you're referring to here. We suggest you engage directly with Kwinana Energy Recovery on this matter.

**6) How are bottom ash, fly ash and other residuals proposed to be managed at Parkes, and what evidence supports the assumption that off-site environmental exposure will not occur over time?**

The Parkes Energy Recovery Facility is being designed to manage residual materials in accordance with best-practice EfW industry standards. As outlined in project materials, the facility will produce approximately 150,000 tonnes per annum of Incinerator Bottom Ash (IBA), which is proposed to be processed to produce recovered aggregates (~132,000 tpa) and to recover metals (~15,000 tpa). Air Pollution Control residues (~29,000 tpa) will be collected separately and transferred for reprocessing or immobilisation in accordance with NSW EPA requirements.

The management approach for residuals will be determined through the EIS, including assessment of leachability, long-term stability, and pathways for beneficial reuse. Our Scoping Report notes that waste and by-product assessments will include risk-based evaluations designed to prevent offsite environmental exposure.

**7) Evidence from councils, residents and agricultural stakeholders indicates sustained opposition to the Parkes proposal. What evidence has PRC relied upon to conclude that the project has, or is capable of obtaining, social licence in the host community?**

Parkes Energy Recovery acknowledges that this technology is relatively new to Australia, and that there are concerns among councils, agricultural stakeholders and community members.

PER views social licence as a long-term activity and something that will need to be maintained and built on throughout the development process, and we have a stated long-term commitment and plan to achieving this.

It is important to note that the concerns to date have been shared without the benefit of the site-specific evidence that will come through the EIS. PER's position is that social licence can be earned through the structured engagement and consultation processes embedded within legislation and through our commitment to long-term listening, engaging and communicating with all interested parties.

The project also sits within the Parkes Special Activation Precinct (SAP), a designated industrial precinct intended for energy-intensive and circular-economy activities. This strategic land-use planning context provides a foundation upon which social licence can be developed through demonstration of compatibility, transparency, and responsiveness to community feedback.

As we progress our EIS, we will document how stakeholder input has shaped design, mitigation measures, and operational considerations, supporting a long-term trust-building approach.

**8) *PRC has characterised regional hosting of the facility as delivering economic benefits. What independent analysis has been undertaken to quantify net economic benefit to the host region, including impacts on agriculture, land values, tourism and infrastructure costs?***

PER has commissioned independent economic analysis to quantify the project's potential regional benefits and costs. The Scoping Report confirms that a full Economic Impact Assessment will be included in the EIS, evaluating employment impacts, supply-chain activity, induced SAP growth, and potential externalities including agricultural impacts, land values, tourism and infrastructure considerations.

Specialist consultants have been engaged to ensure the modelling reflects Parkes-specific economic conditions and aligns with NSW Government guidance for infrastructure and land-use planning assessments. The completed EIS will make methodology, assumptions and findings available for public scrutiny during exhibition.

**9) *To what extent does PRC's case for the Parkes facility rely on regional economic benefit arguments as distinct from waste system need, and what evidence distinguishes those two rationales?***

The Parkes Special Activation Precinct was identified as a suitable location for Energy-from-Waste by the NSW Government. Parkes Energy Recovery (PER) was not involved in the site selection and encourage you to refer to the NSW Government on this matter.

**10) *Can PRC provide any analysis or modelling in support of projections of long-term economic benefit to the Parkes region, as distinct from short-term construction activity?***

Parkes Energy Recovery's (PER) EIS will include long-term economic modelling that differentiates between short-term construction impacts and enduring operational benefits. These long-term benefits include permanent employment, supply-chain participation, energy availability



for new Special Activation Precinct (SAP) industries, and regional economic uplift through industrial co-location and utilities integration.

**11) What specific financial or regulatory settings are relied upon to justify transporting residual waste longer distances to regional EfW facilities, including any interactions with the waste levy, gate fees or contractual arrangements?**

The selection of Parkes as the location for this facility is a matter of NSW Government policy, and we refer you to them in this regard.

**12) What analysis has been undertaken to assess whether the concentration of metropolitan residual waste in regional facilities results in an equitable distribution of costs and impacts between metropolitan and regional communities?**

The selection of Parkes as the location for this facility is a matter of NSW Government policy, and we refer you to them in this regard.

**13) Do mechanisms exist to ensure that additional costs arising from the operation of the proposed facility – such as impacts on local roads, infrastructure or services – are borne by the proponent rather than regional councils or communities?**

In NSW, conditions of development consent and Environment Protection Licence (EPL) obligations typically require proponents to bear the incremental costs associated with infrastructure use, environmental monitoring, and any impacts arising from facility operations.

The specific mechanisms applicable to Parkes Energy Recovery will be defined by DPHI following the submission of our EIS.

**14) If an EfW facility becomes commercially unviable or ceases operation before the end of its design life, what obligations exist regarding site remediation, residual waste management, and protection of surrounding land uses?**

If an EfW facility were to cease operation prematurely, several regulatory and consent-based obligations would apply. These typically include safe decommissioning, site remediation, removal or stabilisation of residual materials, and management of any remaining by-products. EPA licensing conditions and planning conditions provide the legal basis for ensuring that environmental protections remain in place even if operations stop.

The specific obligations applicable to Parkes Energy Recovery will be defined by DPHI following the submission of our EIS.

**15) What is the maximum amount of waste to be processed at the Parkes Energy Recovery Facility?**

- a. Will there be capacity for the facility to process more waste in the future?
- b. Will transport of waste be limited to rail?



***i. If not, what other modes of transport will be utilised for the waste?***

The amount of waste to be processed at Parkes Energy Recovery will be defined in our development consent and Environment Protection Licence.

The majority of waste will be transported to the facility by rail, with transport by road for a smaller proportion of waste sourced from the region.

***16) What process will be followed for the disposal of bottom ash at Parkes Energy Recovery?***

***i. Where will it be disposed of?***

Incinerator Bottom Ash (IBA) generated at the Parkes Energy Recovery Facility will undergo processing to recover metals and to produce a graded aggregate suitable for potential reuse, subject to NSW EPA resource recovery criteria.

Material that does not meet reuse specifications will be transported to a licensed facility for disposal or further treatment. The final disposal location will depend on procurement outcomes and the classification results obtained through testing during the EIS process. The EIS will include assessment of leachability, long-term material stability, and pathways for reuse, consistent with NSW EPA regulatory requirements.

***17) What is the cost of transporting waste from Sydney to Parkes?***

***a. Which agency or body will be responsible for these costs?***

The cost of transporting waste from Sydney to Parkes will depend on the commercial arrangements negotiated between Parkes Energy Recovery, our customers and our logistics providers.

Under typical NSW waste-service contracting arrangements, the costs of transport and processing are borne by councils or commercial waste generators, either directly or through contracted service providers. These costs are commonly incorporated into gate fees, haulage components, or bundled long-term service contracts.

***18) In the event of an unanticipated release of air pollutants, what process will Parkes Energy Recovery follow for immediate community notification and pollutant disclosure?***

In the unlikely event of an unplanned pollutant release or emission exceedance, Parkes Energy Recovery will follow the statutory notification requirements under the POEO Act, the NSW Clean Air Regulation 2022 and the conditions of the Environment Protection Licence. These procedures would typically mandate notification to the EPA, relevant authorities, and affected stakeholders if an incident occurs that may cause actual material environmental harm. This includes all mandatory information including the nature, time, location, estimated quantity of pollutants released, potential impacts, and immediate corrective actions.



**19) HiQ have historical breaches of their EPA licences, including improper leachate management, failure to implement a rehabilitation plan, improper waste cover, improper disposal of asbestos waste, operation of more than one tipping face per cell, failure to establish a risk-based monitoring program, and failure to conduct an independent annual survey, in addition to failing to comply with Pollution Abatement and Improvement Notices. Does Parkes Energy Recovery believe that HiQ is a reliable and responsible operator in light of these breaches?**

HiQ is no longer involved in the Parkes Energy Recovery project, and Parkes Energy Recovery makes no comment on external parties.

**20) How will waste be separated to ensure no hazardous materials and recyclables are combusted at any future energy from waste facility?**

Only non-hazardous residual waste will be accepted at Parkes Energy Recovery. Waste-stream separation primarily occurs upstream through source separation, transfer-station processing, and resource-recovery systems. These upstream controls are designed to minimise the amount of recyclable materials and hazardous waste from entering the residual stream.

At the facility itself, PER will implement waste inspection protocols, including visual load checks, random inspections, and enforcement of contamination thresholds. Loads suspected of containing hazardous materials will be rejected or redirected in accordance with NSW EPA regulations. These procedures are consistent with standard EfW operating requirements and ensure that combustible feedstock meets regulatory and environmental criteria.

**21) In the hearing on 15 December, the EPA stated that energy from waste facilities “recover some materials... but they also generate heat and electricity. So if they’re anchoring a precinct of industrial processes it can be a very efficient way to capture heat, and that heat essentially doesn’t have to be generated a different way”. What, if any, neighbouring industries require heat input?**

The Parkes Special Activation Precinct (SAP) land-use framework accommodates a range of industrial and manufacturing activities that may, in principle, benefit from reliable electricity and, where feasible, heat or steam. As part of the EIS, PER is assessing options for future heat and/or steam offtakers and is engaging with potential SAP tenants to understand whether any proposed or emerging industries may require process heat or steam.

At this stage, nothing has been concluded with any specific heat or steam users. Any heat/steam offtake arrangement would depend on technical feasibility, tenant demand, infrastructure requirements, and regulatory assessment. PER will outline in the EIS how the facility’s design allows for future integration with adjacent industrial users should a technically and commercially viable customer base be identified.

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