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NSW Parliament Legislative Council Select Committee on Energy from Waste Facilities
Inquiry into Energy from Waste Facilities

By email: WasteEnergy@parliament.nsw.gov.au

Re: Questions from members to NSW Farmers' Association

Question taken on notice at NSW Farmers' Association's appearance at the hearing held 15 December 2025

***The Hon. ROD ROBERTS:** Thank you very much for your attendance today. Mr Martin, what's the agriculture industry in New South Wales worth to the economy?*

***XAVIER MARTIN:** It's around \$30 billion. I think it was noted at \$25 billion or \$26 billion this year.*

***The Hon. ROD ROBERTS:** Lots of money.*

***XAVIER MARTIN:** Yes.*

***The Hon. ROD ROBERTS:** Could you break it down? Would you know what the export market is out of that? Or could you take that on notice and come back to us with that figure?*

For 2024-25, total value of agricultural production through primary industries in NSW was \$25.5 billion¹ of which total exports were valued at \$12.8 billion².

Supplementary questions from members to NSW Farmers' Association

1) I refer you to page 25 of the uncorrected transcript where discussion was held between yourself and Mr Rod Roberts on the topic of the risks to exported meat and produce from toxins. In your evidence you provided answers to the possible risks for meat exporters to the European Union. Could you please elucidate on that answer and outline the standards that must be met for exporters to the EU of meat and other NSW export produce such as: oilseeds, fruits, nuts, wines, and grains?

¹ [Executive Summary](#)

² [Key Export Markets](#)

a. Could you outline the current mandated practice for which a primary producer declares that their meat and/or produce (such as mentioned above) meets the EU market quality standards?

Primary producers demonstrate compliance with EU market standards through mandatory declarations and assurance systems. For livestock, this involves the Livestock Production Assurance (LPA) National Vendor Declaration (NVD or eNVD), supported by NLIS traceability and, where relevant, EU-specific accreditation arrangements. Signing an NVD is a legally binding statement that confirms livestock management, chemical use history and residue status meet market standards. In the plant industry, compliance is verified through commodity vendor declarations, residue monitoring programs and quality assurance systems that ensure traceability and adherence to residue standards set by importing countries. These systems rely on producer declarations being accurate at the time of production.

b. How would toxin contamination harm these exports to the EU?

Toxin contamination can immediately jeopardise export eligibility if detected by testing conducted by importing authorities or buyers. Even when contamination levels are low or below Australian domestic standards, the detection of prohibited or unexpected substances can lead to intensified testing, suspension of shipments, contract cancellations or exclusion from certain markets. Even trace contaminants can undermine exporters' confidence, disrupt supply chains, affect access to finance and erode long-term market trust.

2) NSW Farmers stated that comprehensive regional impact studies assessing cumulative pressures on rural communities have not been undertaken. What specific impact domains remain unassessed in the absence of those studies?

NSW Farmers' evidence refers to the absence of comprehensive, region-wide cumulative impact studies of the type the NSW Government has committed to undertake for Renewable Energy Zones (REZs). NSW Farmers have long advocated that such assessments are essential to fully understand the impacts of large-scale industrialisation in agricultural regions, beyond individual project approvals. In the absence of these promised studies, critical impact areas remain unexamined, including the combined effects of renewable energy infrastructure, transmission lines, Energy from Waste facilities, mining and other industrial activities on land use, food production, rural housing, health and community services, transportation, workforce and social cohesion. Additionally, cumulative environmental impacts such as pollutant buildup, soil and water degradation, landscape fragmentation and permanent loss of productive farmland remain unassessed. NSW Farmers

contends that evaluating EfW facilities in isolation, without considering the broader cumulative effects that REZ studies should address, underestimates the overall and compounding pressures on agricultural regions and rural communities.

3) NSW Farmers referred to potential impacts on agricultural market access. Which existing assurance or accreditation schemes (for example NVD, LPA, MLA or DPI NSW requirements) could be affected by the proximity of EfW facilities to food-producing land?

Proximity to EfW facilities may pose risks to agricultural market access by prompting additional scrutiny within existing assurance and accreditation schemes, even in the absence of contamination. Programs such as the NVD, LPA, MLA and various NSW DPI compliance rules all require farmers to demonstrate that livestock and crops are produced in environments free of chemical, biological or physical contaminants. Since EfW facilities involve waste handling, combustion and emissions, they might lead auditors or buyers to question residue levels, water and soil quality, feed safety or buffer zone adequacy. Although these schemes don't explicitly prohibit farming near EfW sites, proximity may affect traceability, property risk assessments and on-farm assurance, particularly if additional documentation, testing or verification becomes necessary due to heightened concerns.

4) Has NSW Farmers identified any agricultural export markets where proximity to heavy industrial facilities has previously triggered additional scrutiny, testing or buyer concern, regardless of whether contamination was proven?

NSW Farmers has highlighted several land-use contexts in which farmers commonly face additional scrutiny, questions or compliance checks from auditors, buyers and certification bodies. These include proximity to large-scale renewable energy infrastructure such as solar developments, wind turbines and transmission lines, which can prompt questions about potential impacts on soil, water, livestock health or organic certification. Farmers may also be questioned when located near chemical storage depots, fuel or gas facilities, mining operations, waste or recycling sites, fumigation areas or regions with significant spray-drift risk. In these contexts, even in the absence of proven contamination, farmers often receive requests for reassurance, documentation or testing related to residues, heavy metals, hydrocarbons, PFAS or other environmental risks.

5) In the absence of pre-operation baseline sampling for soils, pasture or produce, what challenges arise for farmers in demonstrating compliance with existing food and livestock standards if concerns are raised in future?

Without pre-operation baseline sampling of soils, pastures or produce, farmers may struggle to prove their conditions have remained stable over time. In practice, this absence of baseline data can lead to increased testing, market access delays or the need for farmers to disprove risk assumptions rather than confirm compliance.

6) What difficulties arise for primary producers if chemical residues are detected in agricultural products but there is no agreed baseline or chemical fingerprinting to attribute sources?

When chemical residues are detected in agricultural products without an agreed baseline or chemical fingerprinting to identify the source, primary producers face practical difficulties because they cannot demonstrate the origin of the residues. Existing food and livestock standards require producers to show that their management practices minimise contamination risks, but without baseline data or source-specific markers, it becomes impossible to distinguish between residues that may have arisen from on-farm activities, neighbouring land uses, historical contamination or broader environmental pathways. This lack of attribution can complicate regulatory investigations, delay market assurance processes and require producers to undertake additional testing or provide further documentation to demonstrate compliance, even when there is no evidence that their own practices caused the issue.

7) NSW Farmers stated that cumulative regional impacts have not been assessed. Which cumulative pressures on agricultural regions are therefore not captured when EfW facilities are assessed on a site-by-site basis?

When EfW facilities are assessed only on a site-by-site basis, the broader cumulative pressures on agricultural regions identified by NSW Farmers are not captured. These include the combined effects of multiple industrial developments on land availability, biosecurity risk pathways, regional water resources, transport networks, workforce capacity and the overall environmental load on soils and air quality. NSW Farmers has argued that without a regional scale assessment, planning processes do not account for how several facilities operating within the same district may collectively influence agricultural production conditions, increase compliance burdens or intensify scrutiny under market assurance programs, even if each individual project meets its own approval requirements. -scale assessment, planning processes do not account for how several facilities operating within the same district may collectively influence agricultural production conditions, increase compliance burdens

8) NSW Farmers indicated that landfill will continue to play a role in residual waste management. What risks arise for agricultural regions if landfill options are constrained without a corresponding reduction in waste generation?

If landfill capacity is reduced without a corresponding reduction in waste generation, agricultural regions face increased pressure to accommodate alternative waste facilities, longer waste transport distances and greater exposure of farmland, waterways and water supplies to waste-related environmental risks. These pressures compound existing impacts on rural communities and productive land.

9) NSW Farmers raised concerns about social licence in rural communities. What evidential factors most affect social licence for large waste or industrial facilities in agricultural regions?

Social licence for large waste or industrial facilities in agricultural regions is most influenced by demonstrable fairness in the distribution of impacts, transparency and independence of emissions monitoring, the robustness and conservatism of modelling assumptions, the existence of credible baseline environmental data and whether regulatory compliance is perceived to provide genuine protection for human health, agriculture and the environment rather than merely meeting minimum legal standards. A critical factor undermining social licence arises where facilities or waste streams are considered unacceptable or inappropriate in metropolitan areas but are instead located in rural or agricultural regions, creating a perception that risks and burdens are being displaced onto country communities in ways that would not be tolerated in urban settings.

10) Has NSW Farmers identified any impacts on farm insurance availability, premiums, or finance conditions arising from proximity to large waste or industrial facilities, regardless of whether environmental harm is ultimately proven?

Farmers regard the potential implications for insurance and finance as a major source of risk when large waste or industrial facilities are proposed in the vicinity. Because insurers and lenders routinely consider environmental and operational factors when assessing rural properties, the introduction of significant new industrial activity can create uncertainty about how those risks might be interpreted in future. For many producers, assurances that such developments pose no risk to insurance or finance do not align with the caution with which these sectors typically approach emerging or ambiguous risks. As a result, the possibility of more detailed assessments, additional information requirements or tighter lending conditions is viewed as a genuine concern and dismissing those concerns outright does not pass the pub test for people whose businesses depend on secure access to finance and insurance.