Submission No 5

INQUIRY INTO 'ENERGY FROM WASTE' TECHNOLOGY

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NSW Legislative Council Portfolio

Committee No. 6

To The Director,

I'm contacting you to voice my opposition to the proposed plan to construct a garbage incinerator in Western Sydney.

I am deeply concerned that this environmental disaster is even being proposed in the already disadvantaged area of Western Sydney. Residents typically have low education levels, and it no wonder the government is trying to sneak this proposal under the noses of residents who do not understand the gravity of this issue. Why has public consultation been so minimal in regards to this proposal?

This garbage incinerator proposal is being advertised as a "green solution" however reports show the following predictions:

Modelling predictions at sensitive receptors have been made and the results show:

- The maximum predicted 1-hour NO2 is 39% of the impact assessment criterion, even assuming 100% conversion from NOx to NO2
- The maximum predicted annual NO2 is 7% of the impact assessment criterion.
- The maximum predicted 10-minute SO2 is 13% of the impact assessment criterion, for 1-hour; 8%, for 24-hour; 5% and for annual; 3%.
- The maximum predicted 24-hour PM is 3% of the impact assessment criterion for PM10 and 7% of the advisory reporting standard for PM2.5.
- The maximum predicted annual PM is less than 1% of the impact assessment criterion for PM10 and 3.8% of the advisory reporting standard for PM2.5.
- The maximum predicted CO 15-minute, 1-hour and 8-hour averaging periods are 0.1% or less than the relevant impact assessment criterion.
- The maximum predicted 24-hour HF is 8% of the impact assessment criterion, for 7-day; 4%, for 30-day,; 7% and for 90-day; 11%.

In July 2014, Australia's National Environment Protection Council (NEPC) sought public submissions about proposed changes to the ambient air quality standards. A consortium, including Environmental Justice Australia, Nature Conservation Council of NSW and Doctors for the Environment Australia worked together to create guidelines to help concerned community groups make submissions.

Key guideline points were:

· **Make Australia's annual average PM2.5 standard a compliance standard of 6ug/m**3 **rather than an advisory standard**. Science tells us that there is no safe level of PM2.5, so the lowest possible level should be chosen as the standard. Achieving 6 ug/m3 would reduce the estimated 1590 deaths in Sydney, Melbourne, Brisbane and Perth attributed to PM2.5 pollution by 34%, avoiding about 700 premature deaths. It was officially set at 8 ug/m3

· **Make the 24-hour PM2.5 standard a compliance standard of 20ug/m3 rather than an advisory standard.** Reducing the peak exposures would have health benefits of less hospitalisations and less exacerbations of respiratory symptoms. It became and currently is 25 ug/m3

· **Establish an annual standard for PM10 of 20 µg/m3**. There is good scientific argument for an annual PM10 standard on the basis of exacerbation of lung disease, reduction in lung function in both adults and children, and development of lung cancer from chronic exposure. It became 25 ug/m3.

· **The cleanest air possible:** There is no threshold below which particle pollution has no adverse impact. Health experts are universally critical of the practice of managing 'up to' the national standards. The objective should be "ambient air quality that protects human health and well-being."

· **Exposure reduction framework is needed:** As the science is well established that current exposure is causing health problems, long-term targets to progressively decrease exposure should be adopted.

· **Protecting human health in small communities:** The regulations currently exempt smaller population centres (less than 25,000 people) from monitoring and reporting obligations. Monitoring by population size alone is not adequate protection. The standard should require monitoring and reporting for both PM2.5 and PM10 in population

All of the predictions calculated in the SEARs report are based on less than adequate standards. There is no safe threshold for air pollution, and to say there is completely irresponsible and immoral.

The incinerator is predicted to produce toxic particulates to nearby residential areas. Predicted levels are far beyond ensuring clean air to residents once the facility it up and running. It is being advertised as 'minimal', however there is no amount of air pollution that is safe.

Resident within a 1km radius already put up with air and odour pollution from the nearby dump. The compounding issue of multiple trash sites, industry and motorway pollution has not been accounted for.

Western Sydney residents are already disadvantaged by urban air pollution due to industry and transport. Urban air pollution causes 3.7 million deaths each year across the world, from emissions of large quantities of gaseous and particulate substances small particulates

(PMs)that are breathed deep into the lungs from both factories and from burning fossil fuels for energy and transportation (WHO, 2014). Urban air pollution deaths are due to combined respiratory and cardiovascular diseases in adults, lung cancer, and acute respiratory infections in young children (Smith & Ezzati, 2005).

In the Sears application the facility has been described to have a "net positive greenhouse gas impact, potentially eliminating 1.5 million tonnes of carbon dioxide equivalents (CO2-e) per annum. The emission intensity for electricity generated from the facility is lower than other non-renewable energy generators in NSW."

This sounds fantastic, but it's not good enough. We currently have technology that can produce zero carbon emissions; with the ability to completely eliminate greenhouse gas emissions from energy production, it's called renewable energy. Let's not make justifications for inferior solutions to power because they are better than the worst. Use the land space, invest the money and create jobs in renewable energy instead.

An analysis of future climate found that under a relatively high emission scenario, increased ozone pollution is projected to cause a 40% increase in the projected number of hospital admissions by the period 2020–2030, relative to 1996–2005, and a 200% increase by the period 2050-2060 (CSIRO, 2011).

Why are we thinking of Band-Aid solutions to garbage? A responsible government should be looking to address the root cause of the problem of excess waste from too much food packaging, excessive purchasing of products and an unsustainable consumer economy.

I would also like to add that the proposal makes various predictions using the best-case scenario. It is expected that the incinerator and its technologies will be working at optimal level and will continue to work without fault indefinitely. There are many examples across the world of environmental disasters that occur when "high tech" facilities that are meant to be "clean", fail. There are residential areas situated directly next to the proposed area for the plant. What will happen to this people should a glitch occur?

I would invite the members of parliament who are proposing this environmental disaster, to build their homes next to the incinerator. Move into Eastern Creek so you can wake up every morning to noisy trucks and cars. So you can experience the delicious smell of garbage and air pollution.

The lure of job creation in the area should not be a trade-off for the health of community members. The government should also consider the health burden it will create from respiratory events on an already strained healthcare system. This will cost more in public healthcare, offsetting any potential job creation advantages to the economy.

The odour study indicates that modelling has been completed and claims that residents of Minchinbury will only slightly be able to smell the pollution from the plant. Besides the fact

that modelling is grossly inaccurate and relies on massive assumptions in relation to the possible content of the rubbish being burned and assumes that no worker will ever deposit anything that is toxic when burned.

My request is:

- Call for proper public consultation.
- Independent environmental person to inform about the hazards and risks of such a site.
- Planning on how to reduce trash in Western Sydney – ban plastic bags, education on reducing food packing waste in households, education programs for big food to reduce food packaging in stores, tax industrial companies who produce waste, create compost exchange centres
- Create a culture of recycling and minimal waste production
- Consider larger renewable incentive schemes for business and private homes to reduce the need to use energy from non-renewables

I am deeply concerned about the health impact this incinerator will create, and if this goes through I will be moving away from the area to ensure my health and those of my children will not be affected.

Regards,

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References

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