

Submission  
No 378

## INQUIRY INTO 'ENERGY FROM WASTE' TECHNOLOGY

**Name:** Name suppressed

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Partially  
Confidential

Having read through documents hosted on the State Planning and Environment website I wish to lodge my opposition to the proposed Eastern Creek incinerator on the following grounds:

1. The EIS is inadequate for the purpose and flawed. The independent assessment by Environmental Risk Sciences Pty Ltd as of the 8th of March 2017 states "Consequently, this HHRA/AQIA has not demonstrated with sufficient confidence that this facility will not pose a human health risk." Further, concludes the margin of safety for the facility is inadequate.

The incineration of waste produces a spectrum of carcinogenic and non-carcinogenic compounds. No current commercial technology can remove all these compounds from waste exhaust. While the health risk can be reduced through ash capture and filtration it cannot be reduced to zero. The proponents response to public comment that it is 'negligible' in the worst case does not pass scrutiny. As the EnRisk report notes the EIS assessment is not an apples to apples projection as the waste incinerated in the proposal does not correspond to the waste incinerated at existing facilities upon which the projections are based. The actual emissions at the proposed Eastern Creek facility, if constructed, will not be known with certainty until the facility is operational, at which point it will be exceeding improbable the facility would be 'shut down' if found to be outside of EIS projections. The EIS also ignores addressing several known incineration pollutants.

Contrary to 'negligible' risk, it is a huge leap of faith to conclude the facility is absolutely safe. Almost certain, there will be a small statistical increase in cancers and premature deaths as a result. That individual cases attributed to the incinerator will be almost impossible to identify from causes from other pollutants is a curtain behind which the incinerator operator will hide to deny liability.

2. The proposed capacity to of over a million tonnes of waste per year equates to an estimated 100,000 (each way) heavy vehicle movements per year. Unlike point 1, deaths associated with heavy vehicles servicing the incinerator will be identifiable. It cannot be stated that there is an absolute certainty road deaths will occur but it is extremely probable that increased road deaths and injuries will be a result.

3. Anecdotally, the waste disposal industry has a appalling history worldwide of breaching environmental regulations. As pollution control is a major cost contributor to the operation of waste disposal (or other emission heavy industry), the industry is strongly incentivized to knowingly operate in contravention of regulations. A commercial operator who faces the prospect of a costly shutdown or running the risk of detection by the EPA is highly likely to simply run the risk.

4. The burning and release of asbestos is likely. The proponent states that asbestos will not be accepted. In truth, given the industry wide problem of illegal asbestos dumping, it is more likely than not asbestos will be mixed with other waste material by third parties. It is hard to see how the problem can be prevented at the volumes of waste that will be processed by the facility, other than inspection and testing of every load of material. Simply stating they do accept asbestos will not stop the issue.

5. Arguments that waste incineration for energy is a green technology are demonstrably false. While incineration does produce less greenhouse gasses than land dumping of an equivalent mass of bio material, it does nothing to reduce the amount of waste being created in the first instance and encourages it through complacency. It is the same argument as saying; 'smoking cigarettes is an environmentally friendly way of disposing of tobacco leaf.'