Submission No 9

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

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Introduction

My name is Sharon Woods, I have resided in the Parkes area my entire life, and I own and run a mixed farming enterprise with my husband and children, 22km from Parkes. I strongly oppose the Energy-from-Waste facility proposed for Parkes.
I thank the Committee for the opportunity to make a submission to the Inquiry into Energy-from-Waste (EfW).
This submission focuses on the failure to uphold the **proximity principle** under the *Protection of the Environment Operations (Waste) Regulation 2014*, the significant risks associated with long-haul transport of waste, and the absence of essential baseline studies before Parkes was selected as a permissible EfW site.

Breach of the Proximity Principle

Section 2.1.2 of the NSW Government initiatives clearly states that efficient waste management practices should **minimise the cost, resource use and emissions from the unnecessary transport of waste in NSW**.

Section 2.1.3 recognises that unnecessary long-haul transport of waste carries significant risks, including:

- Increased heavy vehicle traffic and congestion
- Greater fuel consumption and carbon emissions
- Higher risk of accidents, waste spillages and contamination
- Substantial environmental damage and costly clean-ups, particularly with hazardous wastes

Despite this, Sydney's red-bin waste is proposed to be transported **over 500km from St Marys to Parkes by rail through Cootamundra**. This is a clear contradiction of the principle and exposes regional communities to risks that the framework was designed to prevent.

Proximity to Sensitive Land Uses and Agriculture

The Parkes Activation Precinct was previously zoned agricultural and is surrounded by vital farming and community infrastructure.

The site is:

- Approx. 2km from the nearest working farm
- Approx. 4km from **Westlime**, renowned producers of super fine, high-purity limestone, for agricultural, road construction and stock feed. Their facility in Parkes processes high-quality limestone that is distributed across NSW and interstate. (The potential for widespread contamination across Australia is real)
- Approx. 20km from the **Forbes Central West Livestock Exchange**, one of the largest livestock selling centres in the state
- Approx. 7km from Parkes' main street
- Approx. 5.7km from the nearest school
- Approx. 7.3km from the hospital
- Approx. 9.2km from the Parkes Water Treatment Plant
- Approx. 11km from The Grain Corp terminal

Parkes is a highly productive agricultural region, with grain, livestock, and related agricultural products exported both nationally and internationally. The town's economy has been built and sustained on farming for generations, forming the backbone of local employment, business activity, and community wellbeing. Agriculture supports a wide network of ancillary industries, including farm machinery suppliers, feed and fertiliser providers, transport and logistics services, food processing, and equipment maintenance, all of which rely on a thriving farming sector.

During droughts or periods of poor harvest, the economic impact is felt across the entire community. Reduced farm income leads to lower spending at local shops, service providers, and hospitality businesses, which in turn affects employment and the viability of small enterprises. Socially, hardship in the farming

sector often translates to stress and anxiety in families, adding pressure to local healthcare and community support systems. The health of Parkes' economy and the wellbeing of its residents are therefore closely intertwined with the productivity, sustainability, and safety of the agricultural sector.

Introducing a facility that poses risks to soil, water, air quality, or livestock health threatens not only the viability of individual farms but also the broader economic and social fabric of the Parkes community. Protecting agriculture is essential to maintaining regional resilience, food security, and the long-term prosperity of the town.

Failure to Conduct Baseline Studies Before Site Selection

Before Parkes was identified as one of four "*allowable*" Energy-from-Waste locations, a range of critical, ***independent*** assessments should have been undertaken, including:

- **Regional Economic Impact Reports:** To weigh short-term construction jobs against long-term risks to existing industries, particularly agriculture, food processing, and tourism.
- **Cost-Benefit Analyses:** Including hidden costs such as healthcare, infrastructure strain, road/rail safety, and waste transport subsidies.
- **Local Business Impact Studies:** To assess potential impacts on small businesses, services, and property values.
- **Agricultural Impact Assessments:** To determine risks of contamination of crops, livestock, soil, and water from emissions (dioxins, PFA's, heavy metals).
- **Biosecurity Risk Reports:** To evaluate risks to food security, including potential loss of Australia's "clean and green" branding and access to export markets.
- **Environmental and Health Assessments:** Including site-specific air quality and dispersion modelling, water risk assessments for rainwater harvesting, groundwater, and surface water, and public health risk assessments with input from independent medical and epidemiological experts.
- **Social Impact Assessments:** To measure effects on community wellbeing, cohesion, and health, particularly given the local shortage of doctors and the fact that Parkes' new maternity ward cannot operate due to lack of staff.
- **Community Consultation Reports:** Ensuring meaningful engagement with farmers, residents, and Traditional Owners before site selection.
- **Alternative Assessments:** Comparing EfW with higher-order waste solutions such as recycling, composting, and anaerobic digestion.
- **Transport and Safety Studies:** Analysing risks of moving hundreds of thousands of tonnes of waste by rail through regional towns, including derailments, hazardous cargo, and fire risks.
- **Cumulative Impact Assessments:** Considering how multiple industrial projects in the Central West may interact and compound risks to land, air, and water.

While some technical studies were conducted as part of the planning process for the Parkes Special Activation Precinct (SAP), including the **Community and Social Infrastructure Needs Assessment, Environmental, Heritage and Sustainability Assessment Summary Report, and Geology, Soil and Contamination Preliminary Site Investigation** published in the 2019 SAP Structure Plan, these were **not independent assessments**. They were part of the planning process led by the **Regional Growth NSW Development Corporation (RGDC)**, whose role was to develop and promote the SAP and identify suitable locations for various industries, including the proposed EfW facility.

Furthermore, the **Parkes Energy Recovery consortium**, responsible for the EfW project and selected through a market process by the RGDC, is tasked with conducting the necessary technical studies, including the **Environmental Impact Statement (EIS)** and **Human Health Risk Assessment**, as part of development approval. These studies are being carried out by the project proponents themselves rather than independent third parties.

Instead, the decision appears to have been fast-tracked on the basis of "regional equity" and the Inland Rail connection, without proper due diligence.

In response, local community groups, including the Parkes Clean Future Alliance, have raised concerns regarding the potential health, agricultural, environmental, and economic risks of the project. These groups continue to advocate for **independent studies** to ensure all potential risks are fully and objectively assessed, highlighting the community's desire for unbiased evaluation to protect regional health, agriculture, and the environment. Instead, the decision appears to have been fast-tracked on the basis of "regional equity" and the Inland Rail connection, without proper due diligence.

Regional Inequity

The selection of Parkes as a permissible site for an Energy-from-Waste (EfW) facility raises profound questions about fairness and equity between metropolitan and regional communities:

- **Disproportionate Burden on Regional Communities:** If EfW incineration was deemed unacceptable in Sydney — where the waste is generated — it is fundamentally unfair to impose the same risks on regional towns. Parkes residents and farmers were not given a meaningful opportunity to participate in site selection or reject the project, unlike city communities who successfully voiced their concerns.
- **Health, Environmental, and Safety Risks:** City communities rejected EfW because of well-documented concerns around air pollution, dioxins, PFA's, heavy metals, and the potential for accidents or emissions that threaten human health and the environment. Rural families and agricultural producers in Parkes are now expected to shoulder these same risks, despite living close to farms, schools, hospitals, and essential water infrastructure.
- **Economic and Social Impacts:** Parkes' economy is heavily reliant on agriculture, which supports local businesses, services, and employment. Any risk to soil, water, crops, or livestock from EfW emissions threatens the town's long-term economic resilience. Hardship in the farming sector has cascading effects on the broader community, affecting small businesses, employment, and social cohesion.
- **Intergenerational Responsibility:** Rural communities produce much of the nation's food. Exposing farmland, water, and the local population to industrial waste risks undermining the productivity, health, and safety of future generations. Regional families should not be forced to accept hazards that metropolitan residents would not tolerate.

Regional communities deserve the same rights as urban populations: **clean air, safe food, and healthy, productive land.** Parkes, and towns like it, should not be treated as convenient dumping grounds for Sydney's waste. Decisions about waste infrastructure must respect regional voices and the principle of environmental justice.

Conclusion

The Parkes Energy-from-Waste (EfW) proposal represents a clear breach of the **proximity principle** under NSW waste law, which requires that waste be managed as close as possible to its source to minimise transport, emissions, and risk. By transporting hundreds of thousands of tonnes of Sydney's waste **over 500km** to Parkes, the project undermines the stated objectives of the **Protection of the Environment Operations (Waste) Regulation 2014**, including efficient waste management, minimisation of resource use, and reduction of environmental harm from long-haul transport.

Beyond regulatory breaches, the proposal presents significant risks to the **agricultural sector**, which is the backbone of the Parkes economy. Potential contamination of soil, crops, livestock, and water from emissions such as dioxins, PFA's, and heavy metals could compromise both domestic and export markets, threatening the financial viability of farms and the broader regional economy. The impacts would extend to local

businesses, services, and employment, with the cascading social and economic consequences that rural communities have experienced during past droughts and other agricultural downturns.

The proposal also raises **serious public health concerns**. Parkes is a regional centre with limited medical capacity, including a shortage of doctors and a new maternity ward that cannot operate due to staffing constraints. Introducing persistent industrial emissions close to schools, hospitals, and residential areas puts vulnerable populations at heightened risk, particularly children and the elderly.

Critically, these risks have not been independently assessed. Baseline studies covering environmental, agricultural, economic, social, and public health factors were either incomplete or conducted primarily by the project proponents rather than independent third parties. Community consultation has been limited, with farmers, residents, and Traditional Owners not meaningfully engaged in the decision-making process prior to site selection.

Without **comprehensive, independent assessments** and **genuine engagement with the local community**, the Parkes EfW proposal cannot be justified. Regional communities should not be treated as "second-class citizens" to bear the externalities of metropolitan waste disposal.

The **Parliamentary Inquiry** has a critical role in ensuring that decisions about waste infrastructure in NSW are grounded in **evidence, fairness, transparency, and long-term sustainability** rather than expedience or economic convenience. Parkes and other regional towns deserve the same protections as metropolitan areas: **clean air, safe food, productive land, and healthy communities for current and future generations**.