Submission No 110

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Name: Name suppressed

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NSW Parliament
Legislative Council
Select committee on Proposed
Energy from Waste Facilities

Submission to the upper house inquiry into waste to energy.

In making this submission I am registering my total opposition to the proposed construction and operation of any waste incinerator in New South Wales. In particular I raise strong objections to the proposed Waste to Energy (incinerator) to be located in the Special Activation Precinct (SAP) in Parkes, NSW. I call for a complete moratorium of MSW incineration and thermal treatment of plastics in New South Wales.This is a great opportunity for the Government of NSW to step up, with fortitude and conviction, and take the lead to ban all unnecessary plastics. These toxic incinerators do not have a 'social licence' to operate anywhere.

In this submission I will refer to the terms of reference, in particular items (a) (b) (c) (d) (e) (f) (g) and (i).

(a) Performance.

The technology for the proposed Parkes Waste to Energy Facility (incinerator) "is currently used in hundreds of incinerators around the world" (Parkes energy recovery community Q and A p5). The proponents claim this is safe technology yet further on in the same document the proponents admit that there are toxic emissions generated during the incineration process, expressly mentioning dioxins and furans.(p7) They also mention that highly, non-usable, Air pollution Control residues are produced and need to be 'disposed of in an appropriately licensed facility' (p7). The Parkes incinerator is proposed to process 600,000 tonnes, (initially), of MSW p.a. This will result in around 24,000 tonnes of highly contaminated toxic waste needing specialist disposal each year for the expected operational life of 30 to 40 years. In simple terms around three quarters to almost one million tons of toxic ash. Additionally of concern is that monitoring of extractive flue gasses will only be 'conducted every three months for the first 12 months of operation and two measurements per year after that' (p7).

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The experience of overseas incineration facilities paints a less than favourable picture. As the Parkes facility (incinerator) is based on this 'latest technology' then concerns must be raised about how safe this plant will be. While the EU has improved standards for incineration since 2000, the release of air pollution and toxic ash residues has continued (Waste from Energy- A myth busting factsheet, ntn.org 2022) Many communities in Europe report air pollution breaches, non-compliant operations and other serious pollution events regularly. (ntn.org , 2022).

(b) Spread of Emissions

As mentioned above, there have been many reports of breaches of air pollution and non-compliant plant operations. It is reported (ntn.org 2022) that 'incinerators can emit up to a years' worth of air pollution in just one bypass operation or OTNOC event.'. This report goes on further to posit "these events can deposit residues of dangerous persistent organic pollutants in the surrounding environment that contaminate the food chain, environment, waterways and can harm human health." The spread of emissions does not stop at the chainwire fence surrounding the SAP. or any other facility. Furthermore the risks associated with the transportation of the toxic ash from these facilities is a cause for alarm given the vast distances involved, the ageing and near perilous conditions of our rural road network and the effect of extreme weather events on our rail network, contributing to potential spill risks.

(c) Health Impacts

The Australian Public Health Association (APHA) conducted a review of the impact of waste incineration on human health. It reported "This systematic review highlights significant risks associated with waste incineration as a form of waste management." going on to conclude "While the results were not consistent across the literature, **based on a precautionary principle there is <u>insufficient</u> evidence to conclude that any incinerator is safe**."

(d) Human Health

Toxic incinerators represent a threat to human health. Incinerators emit a toxic cocktail of pollutants into the air. These pollutants include dioxins, heavy metals, acid gasses, fine particulate matter and microplastics.. These pollutants seep into communities as airborne pollutants. Well documented research shows that these toxic substances can affect respiratory illness, cardiovascular diseases and be a catalyst to neoplasia (cancer) and have been linked to proximity to incinerator locations. The known effects of these emissions on the endocrine system is also well documented. As mentioned above, adding in the toxic ash as well poses a significant risk to public health.

(e) Effect on Agriculture

Incinerators pose serious risks to our prime agricultural lands. Whilst recognising that modern incinerators have pollution control mechanisms there is still considerable risk to the environment. Even the proposed most technologically advanced systems still release pollutants that contaminate air, soil and water. Incineration also generates toxic chemicals which can leach into soils and groundwater and accumulate in food chains It was reported recently that French authorities were forced to ban the eating of back yard eggs and other produce as a result of toxic emissions from a WtE facility in France. This is the same facility the proponents are touting as 'latest technology'

Additionally, to protect our prime agricultural lands and residential areas, it is imperative that the proponent be mandated to **provide base line reporting** before any toxic incinerator project is granted any 'procedural licence'

(f) Alterations (exceptions) for SAP

Developers and proponents alike often seek to have rules changed in their favour so as to make a project financially active and return greater returns for their stockholders.
I make reference to the changes to legislation (regulations) surrounding the thermal treatment of waste that involves or results in energy recovery as found in the Protection of the Environment Operations (General) Amendment (Thermal Energy from Waste) Regulations 2022. In particular I point out clause 128C Exceptions to prohibition on recovery from thermal treatment of waste. Is this a form discrimination based on post code or location? I feel that this diminishes personal value making local residents less valued as a human being, yet equal taxpaying residents of NSW, often without any of the big city standard inclusions like having a hospital where you can have a baby delivered, access to public transport, rather novel concepts for regional residents.
What is not safe for Greater Sydney is now safe in the Parkes SAP or other designated locations.
These exemptions do not stop toxic emissions at the chainwire fence or lines on a map or words in a government gazette These exceptions must be withdrawn and there must be a complete moratorium on MSW incinerators implemented in NSW.

(g) Waste dumping

Just as in incinerator operations there are issues of pollution in the landfill areas throughout NSW. Of particular note is the proposal by Veolia to construct a waste incineration plant at Tarago. They (Veolia) have a terrible track record of not managing the Woodlawn refuse depot struggling to control leachate. Can landfill operators be trusted to manage leachate and other toxic emissions from landfill? Veolia now proposes to ‘stabilise’ the toxic ash byproducts of incineration and bury the ash on site directly into the existing Woodlawn landfill. However, because of the ongoing issues of leachate management Veolia will need to build more leachate storage dams and will not have space to build the ‘promised’ encapsulation cells.. Instead they intend to transship this toxic ash to Sydney, where there is little authorised space left or transship even further to Queensland. This is similar to the proposal put forward by the proponents of the Parkes project. Again we are looking at vast distances, poor road infrastructure, risk of spills and further contamination.

Calleously and deliberately incinerator proponents are nominating special ‘jobs and industry precincts’ across regions of Australia, where there is little regulatory oversight and where pollution impacts pose wide and irreversible damage.

(i) Alternatives

Effective and sustainable waste management programmes are significant yet easily addressable steps in the process of ensuring materials are used to their fullest extent possible, thereby garnering environmental and fiscal stewardship. This is where the need for effective waste transfer stations are necessitated. Close to the resource, readily available workforce, easy transship of sorted resources, effective separation of resources, for example, keeping glass and paper separate so as not to contaminate paper products. There are numerous examples of effective waste stream management in the Sydney basin.

Implementing the hierarchy of the Five R’s can positively impact the outcome of significantly reducing the amount of waste generation in the community. Discarding consumer products comprises around 75% of WSM . Sadly around 80% of this resource is consigned to landfill because of poor end of life options. Adopting circular solutions will

realise environmental benefits. As mentioned earlier, recycling employs more than 3 times the number of people required for operating landfill and far greater than the very few needed for a toxic furnace.

Another alternative to consider is ‘cool technologies’ such as composting and anaerobic digestion to extract energy without creating toxic emissions.

Yours sincerely