Submission No 149

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Organisation: Anglican Diocese of Newcastle

Date Received: 26 October 2025

SUBMISSION TO THE LEGISLATIVE COUNCIL SELECT COMMITTEE ON PROPOSED ENERGY FROM WASTE FACILITIES

In developing this submission, we are mindful that clauses (a) to (e) of the Select Committee's Terms of Reference require it to report on the likely health and environmental impacts of the facilities proposed at Tarago and Parkes, particularly in relation to the performance of 'state of the art' facilities internationally. We are confident that the Select Committee will therefore seek out the best available scientific evidence on which to judge the magnitude of these impacts and that this information will be publicly available. We stress, however, that such an analysis should include comparison with other methods of waste disposal and not comprise simply a comparison with similar facilities overseas.

We are aware that '*Energy from Waste facilities or mass waste incinerators are currently banned in the ACT and Sydney due to health concerns but that current NSW policy allows it in four regional areas*' [1] and that '*the NSW Government's own regulation states that Energy-from-Waste incinerators are not suitable for Sydney due to health and environmental risks*'[2]. While accepting that other submissions will deal in detail with health and environmental risks we wish to emphasise the inequitable application of planning standards that the current situation entails.

In this submission we are primarily concerned with item (i) of the Terms of Reference which requires the Committee to consider 'alternative solutions to reduce and manage residual waste[3] produced by Greater Sydney'. This requires a holistic approach to waste reduction overall. In this context we are concerned that establishment of energy-from-waste (EFW) facilities may have perverse outcomes as they will require the maintenance of a waste stream able to satisfy their operational economics, over several decades. This will effectively limit the extent to which residual waste can be minimised and inhibit development of the circular economies to which the NSW government is committed.

Numerous options are available to minimise the volume of residual waste and these should be incorporated into a strategic approach to the issue. They include:

1. Public education to emphasise the importance of recycling and ensure that waste is appropriately separated and prepared at source;
2. Expanding prohibition of single-use items;
3. Combating the packaging industry's preference for 'virgin plastic' by mandating a minimum content of recycled material where this is fit for purpose, consistent with overseas practice e.g. both the European Union and California have mandated targets for recycled material in bottles and other packaging while Australia currently has only voluntary targets with no enforcement[4];

[1] From motion passed by the 2025 Synod of the Diocese of Canberra-Goulburn (Rev P Davey, pers. comm.)
[2] Parkes Clean Future Alliance (https://parkescleanfuture.org/ ; accessed 13/10/25)
[3] Residual waste is trash that cannot be recycled, composted, or reused. This leftover garbage goes to landfills or gets burned for energy after all recyclable materials are removed. Common examples include dirty diapers, broken ceramics, and mixed materials that are too contaminated to process. Residual Waste: Definition & Significance | Glossary. Available at https://www.trvst.world/glossary/residual-waste/ accessed 13/10/25.
[4] We are grateful to Ms J Hodge of Resourceful Living, Kurri Kurri, NSW (https://resourcefulliving.com.au/) for information relevant to points 3 and 4.

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4. Encouraging the expanded use of recycled material in some applications where its use is currently restricted e.g. current regulations in NSW allow only about 10% of recycled plastic in road base while in Queensland up to 40% is allowed; trial programs in NSW could evaluate the expanded use of locally recycled material;
5. Encouraging start-ups that contribute to the development of the circular economy e.g. conversion of recycled plastic, at the end of its useful life, to oil using currently available technology; use of black soldier fly larvae to convert organic waste to livestock feed (e.g. Arc Ento Tech Ltd, Somersby, 2250; see ARC Ento Tech , accessed 14 October 2025);
6. Mandating repairability of more products through improved design;
7. Developing recycling hubs in regional areas;
8. Developing Extended Producer Responsibility regulations to require product manufacturers to take responsibility for the life cycle of their products, including waste management and recycling. (https://www.packagingnews.com.au/sustainability/epr-and-eco-modulation-apco-outlines-path-to-reform accessed 14/10/2025).

Given that some residual waste will still require management, we are concerned to ensure that alternatives to EFW facilities are comprehensively assessed before any decision is taken to proceed. In the Hunter region, in particular, this should include an evaluation of the use of mining voids as landfill sites. Indeed, the potential of landfill more generally should be evaluated in terms of its comparative logistics, emissions, local impacts and costs. The potential to treat some types of waste that require incineration (e.g. hospital waste) in small, dedicated incinerators, rather than large facilities, should also be considered. The fact that EFW facilities generate a relatively small amount of electricity is no justification for long-term, large scale burning of waste. The evidence seems to suggest that electricity generated by such facilities would be a very small component of the overall market.

Finally, and specifically in relation to the Hunter region, we urge the Committee to acknowledge the difficulty of obtaining social licence for a facility at Tomago that will inevitably produce a degree of pollution given the community's ongoing experience of the PFAS disaster in the Williamtown area.

Yours sincerely in Christ,

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