Submission No 181

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Name: Cr Ross Macdonald

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The Hon. Nichole Overall MLC
Committee Chair
NSW Legislative Council Select Committee on Proposed Energy from Waste Facilities
Parliament House
Macquarie Street
Sydney NSW 2000

Dear Madam Chair

Re: Submission to the NSW Legislative Council Select Committee on Proposed Energy from Waste Facilities

Thank you for the opportunity to make a submission to this inquiry.

The Terms of Reference provide framing to outline my concerns and the concerns of many in the communities that I represent. This inquiry represents an important and meaningful opportunity to provide input and I congratulate members on the establishment of this committee for this purpose.

Please note, I write this in my capacity as a Councillor and resident of Queanbeyan-Palerang Regional Council (QPRC). This submission should be read as not representing views other than my own, including QPRC which has made its own submission published as submission 46 on the committee website.

In this submission I will limit my remarks to the proposed Tarago incinerator.

Regards

Ross Macdonald
Councillor
Queanbeyan-Palerang Regional Council

Attachment: Submission to the NSW Legislative Council Select Committee on Proposed Energy from Waste Facilities

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Submission to the NSW Legislative Council Select Committee on Proposed Energy from Waste Facilities

Introduction

The Queanbeyan-Palerang Regional Council (QPRC) Local Government Area (LGA) directly borders the Goulburn Mulwaree LGA where the Advanced Energy Recovery Centre (AERC), or waste-to-energy incinerator, is proposed. The nearest town is Tarago which has parts within QPRC borders. I have had many conversations with my constituents and residents in neighbouring areas regarding their concerns with the proposed facility which I will summarise in this submission.

This facility, intended primarily to process 380,000 tonnes of residual waste annually, the majority of which is sourced from Greater Sydney, poses an unacceptable and unmitigable risk to the environment, public health, and regional economic stability of the Southern Tablelands. The proposal represents an admission of failure in a state-wide waste policy, seeking to externalise the costs and risks of Sydney's growing waste problem onto rural communities; out of sight, out of mind.

This submission addresses the critical failures of the proposal across three key areas: the unjust burden on regional NSW, environmental and health risks, and the undermining of sustainable waste management principles.

Part 1: The Failure of Waste Equity and Regional Burden

While accepting that waste generated by a city of over 5.5million people must be dealt with, the consideration to the development of the Tarago incinerator, rather than other means to deal with Sydney's waste would burden regional community with metropolitan Sydney's residual waste.

The Policy Double Standard

The NSW Government's own policy framework has effectively ruled out large-scale waste-to-energy facilities in high-density residential areas, including much of Greater Sydney, citing unacceptable risks to human health and air quality. The Tarago site, despite being designated a priority infrastructure area, is located within a functional, populated regional community, and its emissions plume will directly impact the lives and livelihoods of residents, including those in the eastern parts of the Queanbeyan-Palerang region.

The question is simple yet compelling: If this technology is deemed too risky for the air quality and health of Sydney residents, why is it considered acceptable for the residents of Tarago, Bungendore, Goulburn, and the broader Southern Tablelands? This double standard—one set of protections for the city and another, inferior set for the regions—treats regional NSW as a convenient dumping ground, threatening an irreversible loss of social licence for waste infrastructure.

Transport and Infrastructure Impact

The proposal hinges on the transportation of approximately 380,000 tonnes of Sydney's waste via road and rail into our region annually. This massive logistical undertaking will significantly increase heavy vehicle movements, leading to:

1. **Increased Road Trauma and Congestion:** Greater volumes of heavy truck traffic introduce heightened risk to local roads, which are not designed for this perpetual industrial scale of freight, increasing wear, and posing safety hazards to residents, school buses, and general commuters. Further, where cost shifting continues to put pressure on Councils to maintain local roads, the notion that any mitigation measures delivered through road maintenance funding will adequately address road deterioration is misguided. Road trauma should also be considered within the impact on native wildlife. The relevant corridor already records significant vehicle/wildlife collisions which could only be exacerbated by an increase in vehicle movement.

2. **Noise and Amenity Loss:** The continuous movement of waste-bearing trucks and trains erodes the rural amenity and peace of mind relied upon by regional communities. Heavy vehicle noise will also impact the surrounding livestock holdings and would represent a significant impact on any future residential subdivision and lead to an ultimate net reduction in property values.

3. **Climate Impact:** Australia's Climate Change Authority notes transport emissions were 90 Mt CO2-e (21% of Australia's emissions) in 2022, with on-road vehicles accounting for 85% of the total emissions in the sector with a subsector share of 24%. Transporting hundreds of thousands of tonnes of waste hundreds of kilometres away from its source to be burned dramatically increases the overall carbon footprint, contradicting state and national climate change objectives, jeopardising state and federal commitments to delivering net zero emissions by 2050.

Greater Sydney must internalise its waste management responsibilities. The necessary response to Sydney's landfill shortage is not the export of waste to regional backyards, but mandated investment in source reduction, comprehensive municipal and commercial organics recycling (FOGO), and advanced material recovery within the Greater Sydney region itself.

Part 2: Environmental and Public Health Risks

The claims that modern waste-to-energy technology eliminates environmental and health risks are highly disputed by scientific literature and community experience, especially given the sensitive environmental location of the Tarago site. Indeed, these risks form part of the reasonable refusal for such a facility within Greater Sydney.

Threat to the Sydney Drinking Water Catchment

The proposed location is critically situated within the Sydney Drinking Water Catchment. Emissions from the incinerator, dispersed by prevailing winds, will inevitably deposit toxic substances onto land and water surfaces that drain into the catchment area, contaminating surface water, groundwater, and the vast network of household rainwater tanks in the surrounding rural community.

A primary concern is the release of **Per- and Polyfluoroalkyl Substances (PFAS)**. Scientific evidence demonstrates that incineration does not reliably destroy these “forever chemicals.” Instead, incomplete combustion can transform them into harmful by-products that are released into the atmosphere, settling into water supplies. The contamination risk extends from local residents who rely on tank water for survival, all the way to the broader Sydney metropolitan water supply. This risk is unacceptable and effectively unmanageable once introduced.

Air Quality and Human Health

The burning of 380,000 tonnes of waste will release a complex cocktail of pollutants, many of which are hazardous even in minuscule quantities. These include:

- **Particulate Matter (PM2.5 and Nanoparticles):** These fine particles, produced during combustion, bypass standard filtration systems, penetrate deep into the human lungs and bloodstream, and are implicated in increased rates of cardiovascular disease, respiratory morbidity (asthma, COPD), and cancer.

- **Dioxins and Furans:** These highly toxic, persistent organic pollutants (POPs) are known human carcinogens and disruptors of the immune and endocrine systems. While modern plants claim to minimise their release, the risk of non-compliance or error remains, particularly during periods of operational instability.

- **Heavy Metals:** Volatile heavy metals, including mercury, cadmium, and lead, are released and subsequently adsorb onto fly ash and particulate matter, posing severe neurotoxic risks.

Furthermore, a significant portion of highly toxic pollutants is released during **Other Than Normal Operating Conditions (OTNOC)**, such as start-up, shut-down, or plant failures. The proponent has a documented history of environmental non-compliance, odour complaints, and leachate management issues at the existing Woodlawn facility.

This track record provides no assurance that a significantly more complex and hazardous facility like an incinerator can be safely operated without frequent, high-risk OTNOC events that bypass standard emission controls.

Toxic Ash Disposal

Incineration does not make waste disappear; it merely concentrates the toxic load. The process generates massive volumes of highly hazardous byproduct, primarily **Air Pollution Control Residue (APCr)** or fly ash. This ash is light, windborne, and contains extremely high concentrations of heavy metals, dioxins, and other persistent pollutants.

The long-term storage and management of this hazardous waste present an intractable problem. The toxic ash must be stabilised and transported off-site, potentially interstate, for disposal, creating an ongoing risk of spills, contamination, and reliance on distant landfill capacity for decades to come. The local community is, therefore, burdened not only with the incinerator's emissions but also with the long-term management and risk of its highly dangerous waste product.

Part 3: Community Stability and Economic Impact

The proposed incinerator jeopardises the established economic and social fabric of the Southern Tablelands, including the QPRC area.

Impact on Agriculture and Food Safety

Our region is defined by its natural beauty and prime agricultural land which includes sheep and cattle grazing along with crop production and viticulture. The risk of airborne pollutants, particularly PFAS and heavy metals, settling on grazing lands and crops poses an existential threat to our farming community. Contamination could lead to the loss of entire farm livelihoods, the devaluation of agricultural output, and the complete erosion of consumer confidence in regional food products. The loss of a single agricultural enterprise would outweigh any claimed, marginal economic benefit derived from the incinerator's few operational jobs and have a flow on impact to adjacent industries and business operations.

Property Devaluation and Investment Risk

The establishment of a large-scale, controversial, and high-risk industrial facility adjacent to rural residential areas carries a substantial risk of property devaluation across the Tarago, Bungendore, and surrounding QPRC districts.

This financial impact penalises long-term residents and undermines future regional investment, contravening the objective of building strong, sustainable regional economies. This is not a NIMBY argument nor is objection on the basis of devaluation and investment risk an irrational fear rather they are a justified response to a proposal that threatens to poison local assets for the convenience of an external metropolitan centre some hundreds of kilometres away.

Conclusion and Recommendations

The proposed Tarago waste-to-energy incinerator is fundamentally incompatible with the principles of environmental protection, public health, and equitable regional development in NSW. The risks—to the Sydney Water Catchment, to the health of our communities via airborne toxins (dioxins, PM2.5, PFAS), and to our agricultural economy—are too high, too permanent, and too disproportionately borne by the regions for the benefit of Sydney. The proposal is all pain and no gain for the region I represent and will cause serious economic and social pain to regional communities.

The Committee must recognise that waste-to-energy incineration, while positioned as "advanced," is merely an end-of-pipe solution that actively competes with and displaces genuine resource recovery initiatives. It creates a perverse economic incentive to burn waste, thereby working against the core tenets of the circular economy: waste avoidance, reuse, and recycling.

I therefore urge the Select Committee to recommend the rejection of the Tarago Advanced Energy Recovery Centre proposal.