Submission No 218

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Organisation: Parkes Clean Future Alliance

Date Received: 31 October 2025

Submission to the NSW Parliamentary Inquiry into Proposed Energy from Waste Facilities

Submitted by the Parkes Clean Future Alliance — October 2025

Introduction
The Parkes Clean Future Alliance is a community-driven organisation representing residents, farmers, health professionals, business owners, educators and concerned citizens across the Parkes region. We are committed to ensuring that major industrial developments are subject to transparent, evidence-based decision-making and that regional communities are not treated as expendable testing grounds for polluting technologies.
This submission addresses the proposed Parkes Energy Recovery Project, a large-scale Energy-from-Waste incinerator, planned for the Parkes Special Activation Precinct (SAP). It outlines:
• The inequitable regulatory context that enabled this proposal.
• The lack of proper consultation and environmental due diligence.
• The misleading claims and greenwashing tactics employed by the proponent. And Council, NSW Government?
• The shortcomings of NSW's regulatory and monitoring framework compared to global best practice.
• The risks to agriculture, climate goals, regional reputation, and public health.
• The coordinated strategy to embed the incinerator within the SAP before approvals have been granted.
• Concerns Regarding Professor Ali Abbas's Independence and Influence
• Why Trust in the EPA and Planning Laws is Eroded
• The scale of community opposition.
• The Need for Genuine Leadership and Real Solutions
• Recommendations

This project places disproportionate burdens on a small regional community for the sake of metropolitan waste disposal.

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1. Policy and Regulatory Framework

Policy and Regulatory Context
A large-scale Energy-from-Waste (EfW) incinerator is being proposed within the Parkes Special Activation Precinct (SAP), despite serious environmental, health, and policy concerns. This proposal follows sustained community and political opposition to similar facilities in metropolitan areas. Efforts to locate EfW incinerators in Sydney were ultimately rejected.

Federal and state parliamentarians have made their positions clear. In 2021, Chris Bowen stated: "Energy from waste is not the answer to our waste crisis. It is a short sighted and polluting technology."

NSW Environment Minister Penny Sharpe echoed this, saying:
"Communities should not be left to carry the burden of these high-risk facilities when safer, cleaner alternatives exist."

In response to such concerns, the NSW Government applied the precautionary principle, introducing a regulation in April 2021 under then Premier Gladys Berejiklian. This regulation prohibited EfW incineration across most of NSW while identifying just four regional areas as suitable for such facilities: Parkes, Lithgow, Goulburn, and Richmond Valley.

We believe these sites were not selected based on environmental or health suitability, but rather because EfW projects were already being advanced in those areas, and in Parkes' case, because of its location on the Inland Rail network.

A GIPA request by the Tarago community revealed that most of the documents justifying the precincts' selection were marked cabinet-in-confidence. A subsequent GIPA request lodged by PCFA specifically asked for:

"Environmental studies and reference information used in the policy development process to assess and analyse potential priority infrastructure area locations."
The EPA's response, dated 26 August 2025, stated:

"Having regard to the above, I have today decided under section 58(1)(b) of the GIPA Act that the information sought is not held by the EPA."

This confirms our belief that no independent health or environmental studies were conducted to deem Parkes suitable for this proposal. Instead, Parkes was selected due to its logistical advantages (Inland Rail), not because it is an appropriate location for a facility of this scale.

After the failed Eastern Creek incinerator proposal (refused in July 2018 because the Independent Planning Commission found uncertainty about emissions, air and water quality impacts, human-health risks, site suitability, and therefore "not in the public interest" under the precautionary principle), government policy and regulation were recast to prohibit EfW across Greater Sydney and most of NSW, while carving out just four regional precincts.

Applying the precautionary principle to protect large populations while designating a handful of regional towns to bear the same risks is inequitable and indefensible. If EfW is unsafe enough to be prohibited for some NSW residents, it should be prohibited for all. This inequity is further highlighted by the ACT's complete policy position, which prohibits new thermal treatment of waste including incineration, gasification, and pyrolysis within its jurisdiction.

Parkes and the other nominated regional communities should not be treated as exceptions to a rule that elsewhere, including in other regions of the same state, prohibits this technology. Globally, waste incinerators have repeatedly demonstrated that they cannot consistently operate within regulatory limits. It appears the NSW Government has deliberately chosen smaller regional areas to endure the most of these facilities, knowing that communities like ours lack the population size and political leverage to mount the same level of resistance as metropolitan areas. This is not just poor policy it is a clear case of environmental and social inequity.

Response to the Draft NSW Waste Infrastructure Plan

The Draft NSW Waste Infrastructure Plan raises serious concerns about both the direction and integrity of the plan. This draft policy promotes the construction of large-scale Energy-from-Waste (EfW) incinerators across regional NSW under the guise of sustainability and infrastructure modernisation. However, it does so before NSW has made any serious effort to pursue the less harmful and higher-priority options in the established waste hierarchy: waste avoidance, reuse, product stewardship, and genuine recycling reform.

Rather than treating incineration as a last resort, as international best practice dictates, the government appears to be positioning it as the default solution. There is no justification within the Plan for why NSW should fast-track thermal waste-to-energy incineration while options such as food and green organics recovery, source-separated recycling systems, and mandatory packaging reforms remain grossly underdeveloped or underfunded. This prioritisation undermines the entire principle of circular economy thinking and entrenches a linear waste generation and disposal model at an industrial scale.

Moreover, the Draft Plan is built on a deeply flawed and discriminatory regulatory model. The NSW Government has explicitly regulated against new EfW facilities across most of the state including Greater Sydney, the Central Coast, and parts of the Hunter due to health concerns, population exposure, and political resistance. And yet, the same types of facilities are being actively encouraged in regional communities such as

Parkes, Tarago, and Lithgow.

This two-tiered policy is indefensible. If incineration is unsafe or inappropriate for metropolitan areas because of public health and air quality concerns, then it is equally inappropriate for the people of Parkes, Tarago, or any other regional area. Health impacts do not recognise postcode boundaries.

The Draft Plan includes the following language on page 18:
"Finalise the review of the energy-from-waste policy framework. This will enable the construction of energy-from-waste infrastructure, where doing so will reduce our reliance on landfill, increase the resilience of NSW's waste management system, and deliver positive outcomes for communities and the environment."

This language is particularly alarming. At the time the Draft Plan was released for public comment on the 14th of May 2025, the EPA's review of the Energy-from-Waste Policy Framework was still open for submissions through the "Have Your Say" platform, with a closing date of 16 May 2025. Yet the Draft Plan refers to the review as though its outcome is already known and finalised.
This pre-emptive framing undermines the legitimacy of the consultation process and creates the perception that public input into the Framework was never genuinely intended to shape policy outcomes. If decisions were already made while the public was still preparing submissions, this represents a clear breach of procedural integrity.

The Draft Plan further describes the role of the regional precinct model by stating that energy-from-waste facilities should:
• "Improve certainty for communities and industry about acceptable locations and facilities;
• Adhere to the precautionary principle where there is a greater risk of harm to human health because the site is near areas of high population (both now and in the future), and in areas where there are regular exceedances of air quality standards from existing sources; and
• Maximise efficiency in infrastructure, waste management, innovation and energy recovery."

These principles sound commendable in theory, but they are not being applied equitably. The idea that rural and regional areas inherently pose less risk or are more acceptable for these facilities contradicts the precautionary principle. The community of Parkes is no less deserving of health protection than residents in Sydney.

The Draft Plan claims that EfW facilities should "deliver positive outcomes for communities and the environment," yet nowhere does it demonstrate how regional incineration does so. The Parkes proposal, for example, will burn up to 600,000 tonnes of Sydney waste annually, transported over 550 kilometres by rail. The energy generated will not power local homes; it will be used to serve other "hard to place" industries (cite the source or the reference) inside the Parkes Special Activation Precinct (SAP), including potentially dangerous or emissions-intensive enterprises, that along with the proposed EFW facility, will have a cumulative negative impact on air quality, not a

positive outcome for the community nor the environment. This is not a community-focused energy solution. It is a supply chain convenience for industry, achieved at the expense of local environmental quality.

Additionally, the Draft Plan's references to "streamlining approval processes" raise further alarm. The language implies a deliberate effort to accelerate the rollout of waste infrastructure projects, particularly EfW incinerators despite their known environmental and health risks. This terminology suggests not only a rushed process but also a potential reduction in transparency, accountability, and community input.
We strongly oppose the fast-tracking of such approvals. Technologies as controversial and potentially harmful as incineration warrant greater scrutiny, not less. Before even considering EfW, the state must exhaust safer, higher-priority alternatives in the waste hierarchy. Under no circumstances should a flawed technology be made easier to approve through regulatory shortcuts.

The cumulative effect of these issues paints a troubling picture: a state-led policy that is pre-empting consultation outcomes, creating systemic regulatory double standards, and risking long-term environmental damage in the name of waste "efficiency."
This is not circular economy thinking. It is economic expediency dressed in green language.
We do acknowledge and strongly support many of the positive initiatives outlined in the Draft Plan, including the emphasis on food and garden organics (FOGO) recovery, improved recycling systems, and investment in circular economy infrastructure. These are essential and overdue reforms.
What we do not support is the prioritisation of Energy-from-Waste incineration, particularly its rollout ahead of these more sustainable and less harmful strategies.
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2. Human Health and Environmental Impacts

Agricultural and Reputational Risk
Parkes sits at the heart of one of New South Wales' most productive agricultural zones. The Central West region is a major producer of beef, lamb, wool and broadacre grains. These are not small-scale operations, vast volumes of wheat, barley, canola, and pulses are grown, pooled, stored, transported, mixed, and exported under a single regional banner. There are still working farms operating within the Parkes Special Activation Precinct there are also multiple active farms surrounding it highlighting the close proximity to Parkes productive agricultural area.

Because grain from many farms is aggregated, any adverse environmental or food-safety incident near one part of the supply chain can reflect badly on the entire region. Reputation matters not only for domestic buyers, but also for international markets that demand clean, safe, and traceable produce. Any damage to the region's reputation could lead to significant financial consequences, both locally and internationally.
Scientific evidence reinforces these concerns. A 2020 systematic review in the Australian and New Zealand Journal of Public Health (Tait et al.) and the Public Health

Association of Australia's Waste Incineration Policy Position Statement 2024 concluded:

"New incinerators should be located away from areas of food production … Food grown near an incinerator should be avoided."

Given the Central West's crucial role in feeding both Australia and export customers, the potential harm extends far beyond the immediate site. Within Central West NSW specifically, survey data shows that approximately 47% of landholders engage in cropping, while 60% maintain pastures for livestock, mostly sheep and beef. The median farm size in the region is around 1,140 hectares across two properties, highlighting the scale of production.

This sector is not marginal or fringe; it is central to the region's economy and identity and makes a significant contribution to national and international food supply. Any risk of contamination, whether real or perceived could lead to export rejections, loss of value, or requirements for costly testing or labelling. For domestic consumers and international buyers alike, trust in "clean food" is vital.

Considering the significance of the Central West region to Australian agriculture, any risk posed by allowing an incinerator to be located here is detrimental to our region, our state, and our country. Parkes and the surrounding districts are critical to NSW's grain belt and national food security. To jeopardise that reputation with an EfW facility defies both common sense and the precautionary principle.

A crucial and often overlooked dimension of agricultural risk relates to the legal and ethical obligations farmers face under the National Vendor Declaration (NVD) system. Every producer in New South Wales who sells livestock must complete an NVD, which is a statutory document declaring that the animals being sold are safe for human consumption, free from chemical residues and contamination, and have not been exposed to hazardous substances that could enter the food chain. It is the farmer who signs this declaration, assuming full legal responsibility for the accuracy of that statement.

This raises a serious and legitimate question: how can any farmer confidently and truthfully sign such a declaration if an Energy-from-Waste incinerator is approved to operate within or near agricultural zones like Parkes? Once an incinerator of this scale is operating, releasing persistent organic pollutants such as dioxins, furans, and heavy metals that bioaccumulate in soil, vegetation, and livestock, no individual farmer can possibly know with certainty that their property remains uncontaminated.

At the drop in sessions held by Parker Energy Recovery (PER), a local farmer asked the proponents a simple and direct question: could they guarantee there would be no contamination from the facility, so that he could continue to sign NVDs in good faith? The response from the PER representatives was telling, they said, *"That is an unrealistic expectation."*

But it is not unrealistic at all. It is the current standard. Right now, Parkes farmers operate in an environment that is contamination-free, enabling them to sign NVDs honestly and confidently. Introducing a facility that even the proponent admits cannot guarantee the absence of contamination would directly undermine that integrity. It places the burden and legal liability on farmers not the polluter, to prove that their produce and livestock are safe.

Under the existing NVD framework, if contamination were detected in meat, milk, or grain traced back to Parkes, it would be the individual farmer who faces investigation, market exclusion, and potential prosecution. The incinerator operator would not be the one filling out statutory food-safety declarations… our farmers would.

This situation is fundamentally unfair. It transfers the risk, responsibility, and potential liability for pollution away from the polluter and onto the very people whose livelihoods depend on producing clean, safe food. The Government cannot claim to support regional agriculture or uphold the integrity of Australia's food export reputation while approving an industrial operation that makes honest compliance with food-safety declarations impossible.

For these reasons, the Committee must recognise that locating an Energy-from-Waste incinerator in a major food-producing region like Parkes is incompatible with the legal framework governing agricultural production and food safety in New South Wales.

Transport and Climate Impacts

The logistics of this proposal are deeply troubling. It involves transporting a minimum of 600,000 tonnes every year of Sydney's residual red-bin waste by rail over 580 kilometres to Parkes. This is neither a climate-conscious nor resource-efficient strategy. The sheer scale of haulage required to sustain such an operation will generate tens of thousands of rail movements annually, producing significant emissions from diesel locomotives and associated freight handling.

Even before the waste reaches the incinerator, its transport alone will contribute substantially to greenhouse gas emissions, those indirectly generated through logistics and supply chains. These emissions are often excluded from headline project reporting but represent a critical component of Australia's overall carbon footprint. In effect, the state would be displacing the environmental burden of Sydney's consumption onto regional NSW, contradicting the NSW Labor Government's Net Zero Plan and Australia's national commitment to achieve net-zero emissions by 2050.

Transporting waste such vast distances for burning cannot be justified under any serious climate framework. Every tonne of waste carried hundreds of kilometres by rail or road adds to the embedded carbon cost of the final "energy" output, which is already higher per megawatt-hour than most renewable sources. Far from being a clean or circular solution, this model entrenches a linear and emissions-intensive system extract, consume, export, and burn.

And the question remains: if this waste is truly safe enough to incinerate, why is it not treated near its source? Conversely, if it is too hazardous or politically unpalatable to manage in metropolitan Sydney, why should it be considered acceptable in regional communities like Parkes? This double standard exposes the inequity at the heart of the project that regional NSW is being asked to bear the environmental, health, and reputational risks of a problem it did not create, all under the false banner of sustainability.

Health Impacts

Energy-from-Waste (EfW) incinerators emit a complex cocktail of pollutants including fine particulates ($PM_{2.5}$ and PM_{10}), heavy metals such as mercury, cadmium, and lead, and persistent organic pollutants (POPs) like dioxins and furans. These substances are among the most toxic chemicals known to science. They do not degrade easily and instead accumulate in soil, vegetation, livestock, and the human body, where they persist for decades. Once released, they become part of a long-term contamination cycle that no filtration system can completely remove.

Human exposure occurs primarily through the food chain, as these pollutants bind to fat in animals and plants. Dioxins are lipophilic they build up in milk, meat, and eggs. Once ingested, they accumulate in human fatty tissue and the liver, with a biological half-life of up to 11 years. Chronic exposure has been linked to a range of illnesses including cancer, endocrine disruption, immune system impairment, reproductive and developmental disorders, and metabolic disease.

A 2020 systematic review published in the Australian and New Zealand Journal of Public Health (Tait et al., 2020) found consistent associations between incinerator emissions and serious adverse health outcomes, including neoplasia (cancers), congenital abnormalities, infant deaths, and miscarriages. Importantly, the authors noted that the apparent absence of harm in some newer plants is not necessarily due to risk elimination but rather because “perhaps there has not been enough time for adverse effects to emerge.”

The recently published Economic, Environmental, and Sociopolitical Aspects of Waste Incineration: A Scoping Review (Tait et al., 2024) concludes that waste-to-energy incineration is not a justifiable pathway for Australia’s waste future. The author’s state: “The transition to a circular economy with renewables-derived electricity attenuates the benefits of WtE-I. This, combined with grassroots opposition to WtE-I and its violations of social justice, renders future WtE-I projects unjustifiable. Public health practitioners need to promote primary waste reduction, recycling/composting, and other non-incinerator waste management practices in Australia.”

Proponents of the Parkes project claim their facility will use “state-of-the-art” European technology and that it cannot be compared to older plants overseas. Yet such claims hold little weight without comprehensive, transparent, and ongoing health and environmental monitoring. The NSW Energy-from-Waste Policy Statement fails to meet European Best Available Techniques (BAT) standards, particularly for dioxin and furan limits (Australia: 0.1 ng/m^3; EU BAT: 0.04 ng I-TEQ/Nm^3) and the frequency of testing.

Critically, there are no requirements for continuous ambient air monitoring, population health surveillance, or biomonitoring of soil, water, or food. These are the very safeguards required across Europe to detect long-term exposure risks, yet they are absent here.

Recent international evidence highlights why these protections are essential. Studies in the Netherlands and Paris detected unsafe levels of dioxins and PCBs in eggs from backyard chickens living near modern incinerators, prompting authorities to instruct residents not to consume their eggs. Similar findings have emerged in Italy, Belgium, and Japan, where dioxin contamination led to food advisories, agricultural restrictions, or costly remediation programs.

Parkes is a major agricultural district producing grain, beef, lamb, wool, and dairy for domestic and export markets. Any contamination risk from airborne or soil-deposited pollutants could damage public health. With substandard emission limits, no independent oversight, and no baseline monitoring of health or environmental indicators, local residents cannot have confidence that they are protected from harm. The issue is monitoring alone offers no real protection. By the time monitoring equipment detects a breach, the emissions have already been released into the air, water, and soil. Monitoring cannot sense a breach about to occur, nor can it vacuum pollutants back into the stack once they have escaped. Whether the breach is minute or catastrophic, any release could have irreversible consequences for human health and the environment. Contamination of soil or water cannot be undone, and the damage may only become evident years later when it is far too late to act.

This risk is especially alarming given that the majority of Parkes residents on the outskirts of town rely on rainwater for drinking and have no access to a town water supply which would also be under risk from contamination. Airborne pollutants that settle on rooftops and are washed into household tanks represent a direct exposure pathway.

In the NSW Energy from Waste Infrastructure Plan (2021), the NSW Government explicitly states that one of its guiding principles is that “energy from waste infrastructure must adhere to the precautionary principle where there is a greater risk of harm to human health due to proximity to high population areas (now and in the future).” The NSW Chief Scientist & Engineer’s 2018 report on Energy-from-Waste similarly recommended that EfW proposals be subject to rigorous and transparent monitoring, particularly of health, air quality, and food safety parameters. Yet, despite these clear directives, the current policy framework fails to apply or enforce these safeguards.

Our concern lies in the fact that the Parkes Special Activation Precinct (SAP) has been promoted by the NSW Government itself as “Australia’s leading circular economy precinct, focused on waste recovery, waste to energy and waste to resource economies, with potential attraction to other advanced manufacturing sectors” (Parkes SAP Economic and Industry Analysis, Final Report, August 2019). The future vision for the SAP anticipates an industrial area four times the size of the current township,

explicitly designed to attract high-intensity waste and manufacturing industries.
Given this planned industrial expansion and the significant population and workforce growth it is expected to bring, we ask a simple but critical question: when will Parkes be afforded the same application of the precautionary principle that is guaranteed to high-population areas under NSW policy?

The Infrastructure Plan's commitment to apply the precautionary principle "now and in the future" must extend to regional growth centres like Parkes, particularly when the Government's own planning documents forecast a major increase in human settlement and industrial density. If the principle is invoked to protect communities from potential harm where populations are large or growing, it is inconsistent and ethically indefensible to exclude regional areas such as Parkes, where long-term population and industrial expansion are government-led objectives.

If Parkes is being deliberately positioned as a future industrial and population hub, then the same level of precaution, oversight, and protection for human health and the environment must apply here. Anything less represents a two-tiered system of environmental governance, one for metropolitan NSW, and another for regional communities expected to absorb the risks of the city's.
By allowing a large-scale EfW facility to proceed without independent, ongoing biomonitoring or health impact studies, NSW is failing to uphold its own legislative and scientific standards. When the evidence base clearly shows long-term and irreversible health risks, the only responsible course of action is precaution not experimentation on regional communities.

And whilst the majority of us may not experience the full health effects in our own lifetimes, it is the future generations who will bear the consequences of today's decisions. These pollutants will remain in the environment long after the facility has closed, silently accumulating in the ecosystems that sustain life. This is why we fight, for those who do not yet have a voice, for the children and grandchildren who will inherit what we leave behind.

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3. Economic, Social and Regional Impacts

Community Opposition and Social Impacts
Community opposition to the proposed Energy-from-Waste incinerator in Parkes is strong, well-documented, and continuing to grow. A petition of over 6,000 signatures urges Parkes Shire Council to oppose the development, an extraordinary response in a town of just 11,000–12,000 residents. When the Parkes Clean Future Alliance held a public information night, six hundred people attended, filling the venue beyond capacity. Many stood in aisles or sat on the floor to take part. This unprecedented turnout is clear evidence of the community's concern and its deep dissatisfaction with the limited and tokenistic consultation to date.

A community survey of 455 respondents confirms that concern is both widespread and justified. 77.8 % of respondents were unaware of the proposal before Council's first

public post in March 2025, a fundamental failure of early engagement. Once informed, 92.5 % said they either oppose the project or remain undecided, while 90.3 % said they do not believe Council is genuinely listening.

Parkes itself already has difficulty attracting and retaining skilled professionals in essential industries. 78 % of survey participants said they would consider leaving the area if the incinerator proceeds, equating to well over a thousand residents when families are included. Many of those people work in agriculture (73), health and aged care (49), and education (50) sectors that form the foundation of the local economy and community wellbeing. Their loss would deal a devastating blow to the town's workforce, economy, and social fabric.

We have heard this proposal talked about in the renewable energy rollout; this proposal simply cannot be compared to other renewable energy projects being imposed on regional New South Wales. While we acknowledge and sympathise deeply with the farmers who are losing farmland and amenity as part of the renewable energy rollout, the situation facing communities targeted for Energy-from-Waste (EfW) incinerators is fundamentally different and far more severe.

Unlike solar or wind developments, this is not a question of visual amenity, land loss, or coexistence with farming. It is a proposal that has the potential to affect entire populations, contaminate food systems, and inflict irreversible environmental and health damage.

Beyond the physical risks, the psychological and social toll of this proposal has already been profound. The mere threat of an incinerator being approved in Parkes has caused widespread distress and anxiety throughout the community. Families have spoken of sleepless nights, of children fearful about their future, and of a once-proud community now consumed by uncertainty and mistrust. The atmosphere of fear and helplessness that these proposals create is unlike anything experienced under other industrial or renewable developments.

Members of the Parkes community have already spoken directly to our committee, describing the depth of local distress. Some have shared that they recently built or purchased homes, unaware that a waste-burning facility was being planned nearby. We have spoken to many community members who are deeply concerned about the value of their homes and, to an even greater extent, their farms. The market for a property situated near a facility of this nature or for farmland rendered practically unfarmable would be decrease.

Some families have substantial mortgages, and the significant expenses involved in relocation would be out of reach for many. Any devaluation of properties, or additional costs of relocating, must be compensated in full. The question that must be asked is: who will pay for that loss? Who will pay the relocation costs?

Will it be the State Government, Local Council, or Parkes Energy Recovery (PER)?

We have been encouraging homeowners to obtain formal valuations of their properties now, before any determination is made, so that any decline in value over time can be clearly linked to the timeline of this proposal. If property values fall in direct correlation with this project, a clear evidentiary line will exist to support compensation claims. And if this occurs on a significant scale, it will not be a matter of isolated hardship it will be a matter for Class Action. Communities should not be left to bear the financial consequences of government and corporate decisions that devalue their land, livelihoods, and future.

Their position is clear. They do not care how many conditions, filters, or "protections" are promised to keep them safe they simply will not take the risk. No reassurance, no regulatory phrase, and no stack of monitoring reports can outweigh the fear of contamination, illness, and irreversible harm to their families, land, and livelihoods.

Many now express anger, betrayal, and heartbreak, saying they would never have invested in Parkes had they known. Others have spoken of the emotional toll families preparing to split apart, with one parent relocating to protect their children's health while the other remains for work.

These are not abstract fears. They are the real human consequences of a project being advanced without community consent, adequate consultation, or transparency. Families are frightened, disillusioned, and divided. Lives are already being upended and destroyed by uncertainty and by the perception that decisions affecting their health, homes, and livelihoods are being made behind closed doors.

Across New South Wales and Australia, similar communities targeted for incinerator projects have experienced the same pattern of distress mental anguish, division, exhaustion, and eventual displacement. Some residents in other regions have already been forced to move away, unable to bear the ongoing anxiety and hopelessness of living under such a threat. Others have withdrawn from the fight entirely, not because they stopped caring, but because the emotional burden became too heavy to carry.

This anguish is avoidable the suffering caused by these proposals is the direct result of policy decisions. It is entirely preventable. No government that values the wellbeing of its citizens should knowingly permit a project that erodes mental health, divides communities, and forces people from their homes. The psychological harm already inflicted on Parkes and other towns facing similar threats must be recognised as a serious and measurable social impact.

Yet, on a positive note, this adversity has also revealed the very best of Parkes. It has brought the community together in a way not seen in generations a powerful movement built on strength, compassion, and determination. From residents in their nineties who remember a vastly different Parkes, to children as young as five making signs and asking questions, the message is the same: this town cares deeply about its future. That spirit of unity and courage cannot be broken.

Now, with awareness at an all-time high, our local community has a rare and genuine opportunity to embrace local waste reduction and recycling initiatives. People are ready to take action to sort better, recycle more, and reduce residual waste at the source. The energy, enthusiasm, and willingness to change behaviour is here right now. However, if this project is approved, that momentum will be lost. The prevailing attitude will become, "What is the point? It will all just get burnt." This sense of futility will undermine any local sustainability programs and destroy the community's current drive to create a cleaner, more circular economy for Parkes.

This moment could be the catalyst for positive change or the point at which that hope and energy is extinguished, for at least 40 years.

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4. Consultation and Approval Processes

Consultation and Transparency Failures
The consultation process surrounding the Parkes Special Activation Precinct (SAP) and the proposed Energy-from-Waste (EfW) facility has been deeply flawed, opaque, and inconsistent with the principles of open government, informed consent, and procedural fairness.

Prior to any formal public announcement of the SAP or the compulsory acquisition of farmland by the NSW Government, Parkes Shire Council (PSC) approached select landholders in private meetings at Council, requesting to acquire their properties. These discussions occurred without transparency or disclosure of the broader SAP concept, leaving affected residents unaware of the eventual industrial use of their land. Landholders were told that the SAP would include an airport designed to freight locally grown produce, creating the impression that the precinct would primarily support agriculture and regional export. When one landholder directly asked whether an incinerator or Energy-from-Waste facility was being planned within the SAP, they were met with a resounding denial "No, there will not be anything like that in the SAP." This assurance, now proven false, represents a clear breach of trust and demonstrates the pattern of misinformation and concealment that has characterised the planning and consultation process from the outset.

Extensive documentation demonstrates that Energy-from-Waste was embedded in the original SAP planning, yet the Draft Master Plan strategically omitted all reference to EfW, replacing it with vague "Resource Recovery" terminology. None of the early planning narrative presented to the public disclosed that Parkes' road and rail infrastructure was being designed to facilitate waste importation from across the country, or that future industry attracted to the precinct was expected to include heavy, odorous, and noise-intensive operations. The deliberate omission of this information from community-facing material represents a serious breach of public trust.
The NSW Government's 2020 Energy from Waste Factsheet compounded this misinformation, repeatedly describing EfW as a "proven technology" and citing over "2,000 facilities worldwide" as evidence of safety. This characterisation is demonstrably misleading. Many of the cited facilities have experienced repeated emission breaches,

community opposition, and regulatory non-compliance, while others are being phased out under European environmental policy. Dublin, cited as a “proven” model, has recorded multiple unreported dioxin exceedances and lengthy legal disputes facts entirely omitted from the Government’s promotional material.

When adopting the 2021 regulation, the EPA made no proactive attempt to engage with residents of the four affected communities during the public consultation process. This denied those communities any real opportunity to object to bearing the burden of the state’s waste. A single document posted on the EPA website calling for feedback falls far short of the level of consultation that should have been undertaken for a proposal of this magnitude. Most community members do not regularly check the EPA website, and a simple online notice does not pass the public transparency test.
Given the scale of the proposal, the health and environmental implications, and the well-documented community backlash that accompanies EfW projects in almost every case, the EPA should have ensured a robust, large-scale consultation process. Every affected resident should have been properly informed and given a genuine chance to have their say.

PSC’s approach to community notification was equally troubling. In January 2021, Council used the Inland Rail mailing list to circulate information on the Expression of Interest (EOI) for the Parkes Energy Recovery (PER) project, effectively encouraging participation before the community had any understanding of what was being proposed. The EOI closed in February 2021, two months before the Regional Growth Development Corporation’s first community update in April 2021, which made no mention of the EfW proposal. PSC notified the community only after the EOI period had ended, with minimal reach or opportunity for feedback.
There was no Council notification to the community regarding either the Infrastructure Plan “Have Your Say” process or the Regulation “Have Your Say” consultation. Meanwhile, independent community members attempting to share information through the Parkes Community Noticeboard Facebook page, which has significant local reach, reported that posts were deleted or blocked by page administrators with known links to Council.

The majority of the community who have since communicated with the Parliamentary Committee reported that they first became aware of the proposal only two weeks before PER held its drop-in session at Cooke Park Pavilion a Council-owned venue. A community survey conducted by the Parkes Clean Future Alliance asked:
“Before reading the Parkes Shire Council Facebook post on 23 March 2025, were you aware that an Energy-from-Waste facility was being considered for Parkes?”
77.8 % of respondents said they were not aware of the proposal until that point, and 92.5 % stated they do not support it. Many expressed feelings of hurt, deception, and betrayal, saying they had lost all trust and faith in both the local Council and the State Government. The survey found that 90.9 % of respondents believe Parkes Shire Council is not genuinely listening to or representing community concerns about the proposed Energy-from-Waste facility, further underscoring the complete breakdown of trust in the consultation process. For many residents, the shock and disbelief of discovering the

project so late in the process has had a lasting emotional and social impact.

Finally, following the announcement of the Parliamentary Inquiry, the NSW Government distributed a new Energy-from-Waste "Fact Sheet" across Parkes. Once again, it contained misleading statements and unverified claims, with no indication of which Government department authored or approved the material. Taken together, these actions demonstrate a pattern of concealment, misrepresentation, and suppression.

The consultation process for the Parkes SAP and the proposed EfW facility cannot be described as open, transparent, or fair. It has left the community disillusioned, mistrustful, and deeply hurt, feeling deceived by both local and state government agencies.

Greenwashing and Misleading

Parkes Energy Recovery Project (PER), Parkes Shire Council, NSW Government the Regional Growth Development Committee, and the EPA have relied heavily on greenwashing tactics to manufacture a false sense of environmental legitimacy. At its core, this is a proposal to burn hundreds of thousands of tonnes of Sydney's residual municipal waste each year in a rural agricultural region, yet it is being promoted using the language of "circular economy," "renewable energy," and "resource recovery." These claims are misleading, selective, and deliberately obscure the true environmental consequences of incineration. Far from closing the loop, this project locks us into a linear extract–burn–dump system, diverting waste away from genuine recycling and reuse pathways while producing toxic ash, emissions, and greenhouse gases that must be managed for generations.

PER repeatedly claim that the facility will "power homes" and contribute to renewable energy targets. This is demonstrably untrue. The electricity generated will be directed to nearby "hard-to-place" industries within the SAP, not households. Incineration is also one of the most carbon-intensive ways to generate power, emitting more greenhouse gases per megawatt hour than coal, while destroying materials that could otherwise displace virgin resource extraction through recycling and composting. Portraying this as "green energy" is an abuse of the term and undermines genuine decarbonisation efforts in NSW.

Equally deceptive is the use of "circular economy" branding. A true circular economy prioritises waste avoidance, product redesign, reuse, repair, and recycling. Incineration sits at the bottom of the waste hierarchy and is explicitly discouraged in most circular economy frameworks.

Throughout their public communications, PER has relied on a series of farcical and misleading comparisons to manufacture social licence and present their proposal as environmentally and economically beneficial. When scrutinised, these claims reveal a deliberate pattern of greenwashing designed to obscure the project's true impacts and make incineration appear "circular" and "renewable" when in reality it is neither.
One of the most prominent examples is PER's repeated claim that the facility will generate enough energy to "power 80,000 homes" through the production of 60 MW of

electricity from burning 600,000 tonnes of residual waste each year. This figure is presented without context it is a gross output number that ignores the plant's own substantial energy consumption, conversion losses, and the reality that the electricity is not destined for households at all. In their own statements, PER acknowledge the energy will be directed to "hard-to-place industries" within the SAP.

This is not a public utility providing affordable energy to households; it is a private industrial operation. Using household equivalence is a classic marketing trick, not a technical fact. As a result, in a common misconception within the Parkes community. When speaking with residents, the few in favour cite the project providing them with free electricity as their reason for supporting the project.

PER also lean heavily on "state-of-the-art" and "globally proven" rhetoric to imply that modern pollution control technology eliminates the health and environmental risks of incineration. They claim pollutants make up "less than 0.1% on a volume basis" and that "20% of emissions are steam," but provide no full breakdown of toxic pollutants such as dioxins, furans, PFAS, heavy metals, or ultrafine particulates. Volume percentages are irrelevant when dealing with persistent bio accumulative toxins that can have health and environmental impacts even at trace concentrations. Simply calling the plant "modern" does not make it safe this is a rhetorical shield, not evidence.

Perhaps one of the most farcical comparisons made by PER is their claim that stack emissions are comparable to the output of a leaf blower. This trivialises the scale and complexity of the pollutants produced by a facility that will process 600,000 tonnes of residual waste annually. Comparing a high-temperature industrial incinerator's emissions including toxic compounds, heavy metals, and ultrafine particles to a garden appliance is not only scientifically meaningless, but also deliberately designed to downplay legitimate community concern.

PER also selectively compare their project with outdated "old-fashioned incinerators" to make current technology look benign. This ignores the reality that modern incinerators around the world continue to face emissions breaches, operational failures, and community opposition.

PER has repeatedly represented to the community at public drop-in sessions, the Parkes Show, and in their presentation to the Parkes Chamber of Commerce that the facility will be "continuously monitored", giving the clear impression to lay-audiences that all emissions will be under constant surveillance. In our experience, members of our committee have heard those assurances on multiple occasions. In practice, however, when questioned specifically about monitoring of key contaminants such as dioxins, furans and heavy metals, it took four attempts for PER to admit that continuous real-time monitoring of those substances is not being undertaken and a further three attempts for them to enlighten the audience on the true sample period. That creates a serious risk of mis-leading the community: a typical layperson would reasonably understand "continuous monitoring" to mean an ongoing, real-time stream of data for all relevant emissions. yet the reality is far narrower. NSW EPA only mandates short-term testing: four times per year in the first year, then twice annually thereafter, for just

one hour per test. In effect, the wording is deliberate and misleading: it promotes a broad notion of monitoring to build community confidence, while the actual monitoring regime is selective and intermittent.

Therefore, the claim of "continuous monitoring of emissions" is misleading unless accompanied by clear, detailed disclosures of exactly which emissions are continuously monitored, at what frequency, and which are only periodically tested. Without that transparency it mis-represents the monitoring regime and undermines informed community trust.

NSW Government banned incineration in the Sydney Basin on the basis of the precautionary principle and health risks to nearby populations, yet they are telling regional communities that the same technology is "safe" in a rural agricultural region. It is illogical to claim that risks disappear simply because the population is smaller in fact, Parkes' agricultural economy and food production make the region particularly vulnerable to reputational and environmental damage.

Taken together, these examples demonstrate a systematic use of greenwashing, selective statistics, trivial comparisons, and misleading rhetoric to frame the incinerator as environmentally beneficial. This is not transparent engagement; it is marketing.

Given the extent of misleading and greenwashed claims associated with this proposal, the Inquiry should formally examine the accuracy of the proponent's public communications and marketing materials, including statements made on websites, in community Q&As, media releases, and consultation sessions.

The Inquiry should also require independent verification of all comparative claims (e.g. "homes powered," "emissions equivalent to a leaf blower," "state-of-the-art," "globally proven") through expert evidence and publicly accessible data, and refer any demonstrably false or misleading environmental claims to the ACCC or NSW Department of Fair Trading for potential investigation under misleading and deceptive conduct provisions of consumer and environmental law .

Former Mayor Ken Keith, who held office when the Parkes Special Activation Precinct (SAP) was established, continues to publicly promote the Energy-from-Waste project, despite the facility being proposed on land that once formed part of his own residence and farming property. This parcel was the only farmland sold voluntarily to the NSW Government for the SAP, while other local landholders were compulsorily acquired, some after years of resistance. His ongoing advocacy on local platforms and, most recently, on Sydney talkback radio gives the impression of continuing alignment or involvement with the project.

During the interview, Mr Keith dismissed legitimate community concerns, describing opponents as "using the word incinerator in an inflammatory way" and asserting that the plant's emissions would be so minimal that "there's more waste coming from wood-burning fires in Parkes in winter than there is from this plant by a considerable margin." Such statements are grossly misleading. They trivialise the nature and toxicity of

industrial stack emissions and downplay the legitimate scientific concerns being raised by residents and health professionals. Framing the facility as cleaner than domestic fireplaces and implying that its opponents are simply anti-progress misrepresents both the scale and the risk of the proposal.

Compounding this, our committee members have been told on numerous occasions and from multiple independent sources that Mr Keith is still regularly seen at Council offices and continues to attend Council-hosted events. Given his long tenure as mayor and the historical connection of his property to the SAP site, his continued proximity to decision-makers understandably fuels community unease. One must ask why a former mayor, no longer holding office, remains so actively engaged with Council activity and so publicly invested in promoting a controversial project.

Such behaviour perpetuates the perception that those who once helped shape the SAP's foundations remain quietly entangled in its advancement, undermining public trust and the appearance of impartial governance.

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5. Governance, Conflict of Interest, and Independence

Concerns Regarding Professor Ali Abbas's Independence and Influence
In digging deeper, we found the "Clean Tech Sandbox" a barely publicised but highly strategic initiative embedded within the Parkes Special Activation Precinct (SAP). Marketed as "bringing brains back to the bush," it is positioned as a bridge across the so-called "valley of death" between research and commercialisation by providing infrastructure to pilot waste-transformation technologies. However, this is not simply a single facility; it is a testbed for scalable waste-related industries that effectively turns regional NSW into an experimental emissions zone.

This initiative is driven by Professor Ali Abbas, who currently serves as Associate Dean (Research) at the University of Sydney, and was appointed as a Member of the Council for Australian-Arab Relations (CAAR) for the term commencing 26 February 2024 – 26 February 2027. The NSW Government's 2019 Economic and Industry Analysis Report for the Parkes Special Activation Precinct lists Dr Ali Abbas (then UNSW) among the key stakeholders consulted during the precinct's formative planning phase. His early involvement means that he was directly engaged in shaping the SAP's industrial vision, including its identification as a "waste-transition precinct led by an energy-from-waste and resource-recovery facility."

This connection establishes that Professor Abbas was not a neutral observer, but rather one of the academic and technical voices that legitimised the concept of locating such a facility in Parkes from the outset. Despite this, he later served as the independent reviewer of the NSW Chief Scientist's Report on Energy-from-Waste (EfW) a role that, in our view, was far from impartial. Professor Abbas has an extensive record of involvement in the research, advocacy, and commercial development of EfW and

related thermal-treatment technologies. He has led or partnered in multiple waste-to-energy research programs, collaborated with industry on scaling thermal-conversion technologies, and has repeatedly spoken publicly in favour of EfW as an essential component of Australia's waste strategy.

In his article "Waste-to-energy in Australia: how it works, where new incinerators could go and how they stack up" (The Conversation, 2024), Professor Abbas frames incineration as a safe and beneficial solution to Australia's waste problem, asserting that modern facilities can be "efficient, safe and environmentally controlled." The overall tone of this publication strongly favours large-scale waste-to-energy projects such as the one proposed in Parkes, while offering minimal consideration of higher-order waste strategies such as reduction, reuse, or circular design.

Adding to these concerns, Professor Abbas's position on the Council for Australian-Arab Relations coincides with the emergence of the Tribe Consortium, whose ownership structure includes UAE-based investors. The signing of the Australia-UAE Comprehensive Economic Partnership Agreement (CEPA) in October 2024 further heightens the perception that the Parkes project may be influenced by international trade relationships rather than local or environmental priorities. The appearance that a key figure involved in both the SAP's conception and Australia-UAE government-to-government trade facilitation may also be associated with, or sympathetic to, the interests of the project's proponent group warrants full transparency and independent scrutiny.

Taken together, Professor Abbas's roles as an early consultant in the SAP's design, an academic advocate for EfW, a government-appointed reviewer of the Chief Scientist's report, and now the driving force behind the Clean Tech Sandbox reveal a pattern of overlapping influence that is inconsistent with the principles of independence and public accountability. The fact that the same individual is now leading an initiative within the Parkes SAP that explicitly seeks to pilot and commercialise waste-transformation technologies, including EfW, without independent oversight further underscores how closely this agenda is aligned with industry interests rather than objective evaluation.

This convergence of roles raises legitimate concerns that the policy, planning, and research processes surrounding Energy-from-Waste in NSW have been captured by a small, interconnected network of technology advocates, rather than being guided by genuinely independent scientific scrutiny or the public interest. Ensuring genuine independence in future reviews, policy development, and pilot programs is essential to restore confidence, transparency, and integrity in decision-making processes that have such far-reaching implications for regional communities.

Strategic Embedding in the Special Activation Precinct/EPA

Another concerning development involves Exergy, a separate industry proponent seeking to establish operations within the SAP. Exergy proactively approached PCFA to request a meeting, acknowledging that gaining social licence from the community is a crucial step in their proposal. They also presented at the Annual Parkes Show in a tent

directly beside PER.
When questioned by community members about why they appeared to be “partnering” with PER, the Exergy representative responded that they had been told by the Regional Growth Development Corporation (RGDC) that they “need their electricity and trains.”

This raises serious concerns. Firstly, it suggests the SAP is being marketed to prospective businesses as though the incinerator’s approval is a foregone conclusion, well before statutory assessment and approval processes are complete. Secondly, it implies the success of other businesses is being made contingent on the approval of the incinerator, effectively using them to bolster support for PER’s project.

This approach places inappropriate pressure on both new businesses and the community and undermines the integrity and independence of the approval process. It suggests a coordinated strategy to embed the incinerator as the linchpin of the SAP, regardless of legitimate community opposition or environmental assessment outcomes.

Why Trust in the EPA and Planning Laws is Eroded
Any claim that the Environment Protection Authority (EPA) or planning laws reliably protect communities must be viewed through the lens of their track record. The following examples, Belubula River PFAS contamination and the Broken Hill lead debacle expose structural and systemic failures of oversight, transparency, and enforcement. Coupled with recent sweeping changes to planning law the evidence compels the conclusion: the system is not working, and community trust is rightly eroded.

In the Upper Belubula catchment, PFAS has repeatedly been detected in river water, in fish, and in adjacent land. The EPA itself traced contamination to a composting facility, a landfill and a nearby gold mine, and imposed additional licence conditions. Yet the responses have been slow and insufficient. One public review found the EPA delayed fish testing by over eight months, despite evidence of dangerously high PFOS in carp. Meanwhile, foam laden with PFOS reappeared in 2025 close to known contamination sites, sometimes at extreme concentrations (e.g. 540,000 ng/L, many times above drinking-water guidelines). Together, this pattern demonstrates that the EPA is often reactive rather than proactive; it fails to act swiftly or forcefully when contamination emerges; it tolerates ongoing harm while delaying solutions. For communities relying on the EPA to provide oversight of industry and relying on river water for irrigation, livestock, or recreation, such delays are tantamount to abdication of duty.

In Broken Hill, the EPA commissioned a major scientific study Environmental Lead Risks at Broken Hill, NSW and received it in December 2019. However, the report was withheld for years before formal public release in October 2023. Internal emails (released under freedom of information) reveal that the EPA promised mining companies it would “quietly load it … and not tell anyone,” And would not “finger-point” at mines. In those emails, the EPA even offered to pre-brief mining companies before public release, and delayed publication in part to appease industry sensitivity. The report explicitly identified both legacy and ongoing mining emissions, including dust

deposition, as leading sources of exposure, meaning mining activity was still fuelling child lead poisoning. Critically, the suppression of findings during the period when proposals like Bowden's Silver Mines were under review suggests that planning processes were being shielded from scrutiny by a complicit regulator.

Thus the Broken Hill case is not merely regulatory ineptitude, but evidence of a systemic willingness to conceal, delay, and prioritise industry over public health. If a regulator can withhold such critical data, the premise that planning laws and EPA oversight can be trusted is deeply undermined, the state government are asking us to put our trust in an agency that has demonstrated it cannot be trusted.

Recent changes to NSW planning laws also raises alarm bells that the legal framework itself is being re-engineered to further weaken protections and suppress community oversight.

- Experts warn that sweeping planning reforms will reduce environmental and corruption safeguards, weaken public input, and centralize decision-making power in the hands of ministers or proponent agencies.
- The changes may limit third-party appeals, remove or reduce requirements for independent assessment, and curtail opportunities for communities to challenge decisions on merit or process.
- Legal experts argue these reforms increase the risk of regulatory capture, where planning decisions are more easily shaped by private interests without meaningful oversight.
- In combination with the EPA's documented suppression of controversial science (e.g. Broken Hill), these planning law changes create a dangerous synergy: regulation becomes more permissive at the same time as the institution charged with oversight has proved untrustworthy.

In summary, the historical record reveals that neither the EPA nor planning laws in their current form have earned nor deserve any form of public trust. We therefore ask the Committee to acknowledge these systemic regulatory and legislative failures and to recommend urgent reforms that restore genuine accountability and community protection. Specifically, we urge the Committee to call for an independent review of the NSW EPA's conduct in environmental regulation, stronger statutory transparency requirements (including mandatory public release of health and environmental reports), and the reinstatement of meaningful third-party appeal rights within planning laws. Communities like ours cannot rely on agencies or processes that have repeatedly failed to act in the public interest. Robust, independent oversight and legislative safeguards must be restored before projects with significant environmental and health risks are allowed to even be considered.

Lack of Faith in Independent Studies and Reports

The community has no faith in the so-called independent studies or reports associated with this proposal. Repeatedly, these documents are prepared or funded by parties with a vested interest in the project's

We have seen similar “independent” assessments elsewhere in New South Wales that failed to detect or report contamination until after harm was already done. The people of Parkes and surrounding regions will not be another case study in neglect.

Because of this, the community has taken matters into its own hands. The Parkes Clean Future Alliance is preparing to undertake its own independent baseline testing program, funded through community donations and contributions from local farmers, businesses, and residents. We are currently in contact with a laboratory and a contamination scientist to identify the most effective test areas, methods, and contaminants of concern including dioxins, furans, heavy metals, and fine particulate matter.

We are doing this because we cannot rely on the proponent or the NSW Environment Protection Authority (EPA) to provide data that is genuinely independent or transparent. The history of environmental oversight in New South Wales shows a consistent pattern of underreporting, delayed disclosure, and limited community access to raw data.

By conducting our own testing, we are establishing a clear, scientifically verified baseline of environmental conditions before any development occurs. If the proposal were to proceed and contamination or health impacts arise in future, this baseline will serve as critical evidence of causation. It will allow affected residents, farmers, and landholders to seek compensation and accountability through legal or regulatory channels, backed by robust data that belongs to the community itself.

The community should not have to bear this responsibility, but given the complete erosion of trust in the process, we will do it ourselves.

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6. Alternatives and Recommendations

The Need for Genuine Leadership and Real Solutions
It should not be up to communities like Parkes to design solutions for Sydney’s waste crisis. The responsibility lies squarely with the NSW Government to exhaust every possible measure to reduce and manage residual waste before asking regional towns to bear the burden.
Only when all waste reduction, recycling, and resource recovery pathways have been fully implemented and proven unsuccessful should the government approach communities transparently to explain how such a situation arose. That has not happened here. We have been kept completely in the dark, and this project has been forced upon us.

Recent independent evidence confirms that incineration is not the way forward. The Economic, Environmental and Sociopolitical Aspects of Waste Incineration scoping review by Tait et al. (2025) concludes that although incineration can reduce landfill volume, it presents significant environmental and health risks, undermines recycling, and violates principles of social and environmental justice. The author’s state:

“The transition to a circular economy with renewables derived electricity attenuates the benefits of WtE-I. This, combined with grassroots opposition and its violations of social justice, renders future WtE-I projects unjustifiable.”

The associated Greenhouse Gas and Air Quality Impacts of Incineration and Landfill analysis reinforces this, finding that waste to energy incineration produces substantially higher greenhouse gas emissions per unit of energy than solar, wind, or other renewables, and that pollutants such as dioxins, furans, and ultrafine particulates remain a major concern. Even the most advanced filtration systems cannot eliminate these risks entirely.

In the context of the proposed Parkes Energy from Waste project, multiple independent reviews, including Zero Waste Australia’s Climate and Health Impacts of Waste Incinerators Are Worse Than Landfill (2022) and the Eunomia Research and Consulting report Greenhouse Gas and Air Quality Impacts of Incineration and Landfill (2022), clearly demonstrate that waste incineration is neither a climate nor a health solution. Both analyses show that incineration performs no better, and in many cases worse, than landfill once the full life cycle of emissions, pollutants, and energy systems is considered.

The Eunomia report confirms that any short term greenhouse gas advantage claimed for incineration will disappear as Australia’s electricity grid decarbonises. Incinerators currently receive a small emissions credit for generating electricity, but this benefit is projected to vanish between 2030 and 2050 as renewable energy replaces fossil fuels. Once that happens, “most of the climate change benefit of incineration over landfill will disappear.” The study also finds that electricity only incinerators, which include nearly all proposals in Australia, are more carbon intensive than gas, renewables, or the future electricity grid, and that landfill performs better when methane capture and recycling targets are met.

Rather than eliminating waste, incineration simply transfers pollution from the ground to the air, releasing large volumes of carbon dioxide, nitrous oxide, and toxic by-products while creating highly contaminated ash that must still be landfilled. These systems lock regional communities into decades of waste imports and emissions while discouraging genuine waste reduction.

By contrast, non-burn alternatives such as waste avoidance, reuse systems, recycling, composting, mechanical biological treatment, and anaerobic digestion deliver far greater environmental, social, and economic benefits. They cut emissions, conserve materials, and create more local jobs per tonne of waste managed than incineration ever could.

To achieve a truly circular economy, the NSW Government must prioritise systemic change rather than short term disposal technologies. This means redesigning products and packaging, enforcing producer responsibility, and investing in regional recycling and organics recovery infrastructure. These solutions keep materials circulating within the

economy, protect public health, and align with national climate commitments.

Continuing to pursue waste to energy incineration, particularly in agricultural and regional centres like Parkes, contradicts the principles of sustainability, equity, and environmental protection. The science is clear: as renewable energy replaces fossil fuels, incineration becomes both unnecessary and unjustifiable.
Instead of locking NSW into a 25 to 40 year dependency on imported waste to feed incinerators, the government should be investing in true circular economy solutions that prevent waste in the first place.

According to Toxic Free Australia, viable, proven, and safer alternatives include:
• Mandatory producer responsibility to eliminate unrecyclable packaging and ensure manufacturers bear end of life costs. Coles bags are a perfect example; we thought that could never happen, and yet change occurred.
• Investment in mechanical and biological treatment facilities to separate, compost, and recover materials from residual waste.
• Expansion of composting and anaerobic digestion infrastructure for organic and food waste, which represents up to half of municipal waste.
• Scaling up plastic to product recycling technologies, such as chemical depolymerisation, that recover usable feedstock without combustion.
• Community driven reuse systems, repair hubs, and container deposit schemes that keep materials circulating in the economy rather than burning them. Our small community is willing and able to adopt these measures ourselves, but it is not our waste that has caused this issue.

The Government has already shown that real change is possible when there is political will. The effective bans on single-use plastics such as straws, plates, and bags demonstrate that strong waste reduction policy can be implemented successfully when priorities are clear. These measures have reduced pollution, changed behaviour, and proven that the community will support bold environmental leadership. A small amount of adjustment was required but he short term inconvenience will pave the way for long term change.

What is needed now is not more waste, but Zero Waste legislation and Extended Producer Responsibility (EPR) laws that hold manufacturers accountable for the entire life cycle of their products. Producers, not regional communities, must bear the responsibility for what they create, sell, and discard.

A Producer Waste Levy or Product Stewardship Charge could be applied directly at the point of manufacture or import. This levy would scale according to the product's recyclability, toxicity, and environmental impact. For example:

- Items made from mixed plastics, composites, or non-recyclable materials would attract the highest levy.
- Products made from renewable, compostable, or recyclable materials would pay little or none.

Funds collected from these levies should go towards:
• Supporting local recycling and remanufacturing industries.
• Funding community-led Zero Waste programs.
• Investing in education, innovation, and cultural restoration projects that promote balance and sustainability.

This system shifts the responsibility and the cost back to those who profit from creating waste, not the regional communities forced to live with it. It would create a financial incentive for companies to redesign packaging, reduce unnecessary materials, and move towards truly circular production models.
By legislating EPR, companies would be required to redesign packaging, minimise waste at the source, and recover materials through circular systems.

Investing in Zero Waste strategies would create more jobs, less pollution, and greater long-term economic stability than any incinerator could. It would show true leadership and protect both people and the environment — without sacrificing Country.

An example of this type of alternative approach is currently being trialled by Hawkesbury City Council in partnership with ARC Ento Tech, who are developing Australia's first waste-to-resource facility at the Hawkesbury Waste Management Facility. The project aims to process up to twenty tonnes of putrescible waste per day that would otherwise go to landfill. Instead of burning or burying the waste, the system uses a combination of mechanical sorting and biological conversion, including the use of black soldier fly larvae to rapidly break down organic materials. This process produces nutrient-rich fertiliser, biofuel, and high-protein animal feed all of which can be reused within existing industries. In doing so, it diverts organics from landfill, reduces methane emissions, and transforms waste into valuable resources within a closed-loop system.

We have had discussions with ARC Ento Tech and believe this approach has strong potential as a scalable, safe, and truly circular alternative for managing residual waste. Unlike incineration, it does not release greenhouse gases or persistent pollutants, nor does it require decades of imported waste to remain viable. The Hawkesbury trial demonstrates that innovation in resource recovery is possible within existing infrastructure, delivering economic and environmental benefits without compromising community health or regional sustainability. This is the kind of forward-thinking solution the NSW Government should be supporting, one that keeps resources in circulation rather than destroying them.

These approaches not only protect public health and the environment but also create long term local employment and directly support NSW's waste avoidance and circular economy targets.

We are fighting two battles.
The first is against the false solution of incineration a technology that undermines true waste reduction, reuse, and recycling, and does nothing to address the root causes of

Sydney's waste problem.

The second is against the ongoing inequity faced by regional NSW where our communities are continually treated as the dumping ground for the city's environmental burdens and industrial experiments.

If the NSW Government is genuinely committed to achieving net zero emissions, protecting regional communities, and building a circular economy, it must abandon plans to export Sydney's waste to Parkes and instead lead a statewide transformation based on prevention, accountability, and respect for people and Country.

Recommendations
In light of the extensive environmental, social, cultural, and governance concerns raised throughout this submission, the Parkes Clean Future Alliance makes the following recommendations to the NSW Parliamentary Inquiry:

An Immediate Moratorium on All Energy-from-Waste Projects

The NSW Government must implement an immediate moratorium on all Energy-from-Waste (EfW) proposals and operations including those within Special Activation Precincts this moratorium must remain in place until genuine waste reduction and recycling alternatives have been properly developed, assessed, and prioritised under a state-wide circular economy strategy.

Apply the Precautionary Principle Equally Across NSW

If Energy-from-Waste (EfW) incineration is prohibited in metropolitan areas on public health and environmental grounds, it must also be prohibited in regional areas such as Parkes, Lithgow, Goulburn, and Richmond Valley.

All EfW projects currently proposed within Special Activation Precincts should be immediately suspended and genuine renewable options support in its place.
The same standards of protection afforded to city residents must be extended to those in regional NSW. Regional communities should never be treated as test sites for technologies deemed too risky for metropolitan areas.

Prioritise Genuine Waste Reduction and Recycling

NSW must return to the core principles of reduce, reuse, and recycle not rely on incineration as a substitute for genuine waste reform.

Incineration undermines recycling efforts by locking the state into long-term contracts that depend on feeding waste rather than eliminating it.
Government policy should focus on:

- Strengthening recycling and composting infrastructure, particularly in regional areas.
- Introducing a Zero Waste legislative framework with clear targets for waste avoidance.
- Expanding Extended Producer Responsibility (EPR) to hold manufacturers accountable for product and packaging waste.
- Encouraging innovation in waste reduction, repair, and material recovery industries.

Local Responsibility for Local Waste

- Each community should be responsible for managing its own waste, supported by appropriate infrastructure and policy incentives.
- This approach promotes accountability, encourages circular local economies, **Norfolk Island** provides a clear model of community-led waste management where reduction, reuse, and cooperation underpin sustainable outcomes.
- A similar localised approach should be adopted across NSW, empowering communities to innovate rather than imposing a centralised, inequitable waste strategy.

Genuine Consultation, Not Dictation

- Consultation must be authentic, early, and informed. It must not occur after decisions are effectively made.
- Decision makers must recognise that consultation is not communication it is participation in decision-making.

Waste Management Reform and Producer Accountability

- Legislate a Producer Waste Levy or Product Stewardship Tax, requiring manufacturers to pay higher rates for producing non-recyclable or single-use materials.
- Use revenue to fund regional recycling facilities, composting programs, and public education campaigns.
- Encourage market innovation in sustainable packaging and design, rewarding producers who reduce waste at the source.

6. Restoration of Trust and Transparency

- Acknowledge the loss of community trust caused by secrecy, censorship, and misinformation from government bodies and proponents.
- Guarantee direct access to data collected by regulators, including emissions, monitoring, and compliance records.

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(All text above is reproduced exactly as provided, reorganised under Terms-of-Reference-aligned headings without any changes to wording.)

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