Submission
No 261

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Organisation: The Parks - Sydney's Parkland Councils

Date Received: 31 October 2025

Sydney's Parkland Councils
The Parks

31 October 2025

Parliament of NSW
ATTN: Select Committee on Proposed Energy from Waste Facilities
GPO Box 5341
SYDNEY NSW 2001

Dear Sir/Madam,

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

The Parks, Sydney's Parkland Councils, welcome the opportunity to provide this submission to the select committee on proposed Energy from Waste (**EfW**) facilities.

Introduction

The Parks represents the seven Councils that make up the Western Parkland City, namely: Blue Mountains, Camden, Campbelltown, Hawkesbury, Liverpool, Penrith and Wollondilly.

The Parks' Councils wish to make a collective submission, while acknowledging that individual councils may also make their own submissions identifying specific issues affecting their local government area.

This submission represents The Parks Waste Alliance Councils, being Camden, Campbelltown, Liverpool, Penrith and Wollondilly.

Please note that some terms of reference have not been included in this response as The Parks has not formed a substantial view on them.

General feedback

The Parks supports the exploration of EfW technologies as part of the development of diverse and resilient waste infrastructure for NSW.

Government leadership, transparency, community engagement, and locating EfW facilities closer to Sydney are key to ensuring that EfW contributes positively to environmental, social, and economic outcomes.

Comments on the Terms of Reference:

(a) the performance of the technologies proposed for the Tarago and Parkes Energy Recovery Facilities as compared to leading thermal technologies employed in "state of the art" facilities internationally, noting such technologies as proposed are not employed anywhere else on the Eastern seaboard

The emissions standards proposed by the NSW EPA are comparable to the European Union Best Available Technique (BAT) Document for Waste Incineration[1], however, other state-of-the-art facilities have lower emissions standards than the proposed, for example the Copenhill EfW facility in, Copenhagen[2]. Notwithstanding, it is acknowledged that the emissions standards proposed by the NSW EPA in their Energy from Waste Policy Statement are more stringent than emissions permitted for other combustion emissions, including for coal power stations, that are based on the *Protection of the Environment Operation (Clean Air) Regulation 2022*.

Insufficient details have been released to form a view of the specific emissions from the proposed technology. It is recommended that the NSW EPA directly appoint a suitably qualified independent verification engineer (IVE) to review the proposed technology and recover the cost of this from the proponents.

(b) the spread of the emissions predicted and the quality of emissions to be generated.

It is suggested that the NSW EPA, proponents and an IVE undertake an assessment and review of the modelled emissions specifically for startup, shut down, and atypical operation (e.g. during maintenance) of the proposed EfW facilities. During these times the plant would not operate at peak efficiency and could generate more emissions. It is also relevant to consider how worst-case meteorological conditions would affect the plume.

The Parks is of the view that emissions from best practice EfW are likely to be far lower than what has been experienced in other parts of NSW from coal power and other licenced industries.

(c) health impacts from currently operating older technology waste incinerators as compared to the proposed newer technology.

New technology EfW emits a fraction of pollutants compared to older technology. EfW is regulated in the same manner as other NSW EPA licenced activities, and it is likely that health outcomes from residents living near to best practice EfW facilities are likely to be substantially better than those living near some existing industries such as coal fired power stations.

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[1] https://www.epa.nsw.gov.au/sites/default/files/2025-10/A7867130%20-%20Response%20to%20Minister%20Sharpe%20-%20Energy%20from%20waste%202025.pdf
[2] https://www.ieabioenergy.com/wp-content/uploads/2021/03/T36_WtE-and-Social-Acceptance_Copnehhill-WtE-plant-in-Copenhagen.pdf page 11

(d) impacts on human health including on regional town drinking water, rainwater harvesting and soil contamination

Due to the age of the technology, there are limited studies on the latent health effects of new technology EfW, however, the harmful emissions are a fraction of those created by older technologies and other existing industries, such as coal power. NSW should look to extensive international experience in delivering new technology EfW. In this regard, there are 22 EfW plants operating in Tokyo, Japan (many within 500m of residential receivers), 75 in the USA and over 500 across Europe.

As previously discussed in response to term 1(a), the appointment a suitably qualified independent IVE to assess the developments would assist in transparently assessing their impacts.

(h) the methodology of emission monitoring employed by leading large scale waste-to-energy facilities in Australia and across the world

It is understood that the emissions monitoring would be regulated by the NSW EPA under licence conditions which would be based on the emissions standards detailed in the NSW EPA Energy from Waste Policy Statement. Under this, a mixture of Continuous Emissions Monitoring Systems (CEMS) and periodic monitoring would be used. It is unclear whether these are best practice methods for EfW. As the regulator, the NSW EPA may be able to provide further comment, and/or the committee may consider engaging an independent expert to undertake a review.

The NSW EPA Energy from Waste Policy Statement requires that EfW facilities provide near real time data to the public. The Parks strongly agrees with the NSW EPA's position and is of the view that transparency is paramount to alleviating community concern around EfW.

(i) alternative solutions to reduce and manage residual waste produced by Greater Sydney, and

EfW is necessary:

While other circular economy initiatives such as FOGO, waste reduction mandates and product stewardship schemes are relevant and necessary to reduce the amount of waste that is being landfilled, Sydney still faces a waste crisis for which the NSW EPA has not yet facilitated a solution for beyond around 2035. It is not practicable to build new landfills near Sydney, and logistically it is difficult to transport Sydney's waste for regional disposal. The issue of transport is notably something that the current proposal fails to address. The Parks is of the view that EfW is a necessary technology to divert waste from landfill. As can be demonstrated through lifecycle analysis, EfW is preferable to landfilling, and can be undertaken in an environmentally satisfactory manner.

Alternative EfW technology needs to be supported:

Other alternative EfW technologies should be supported to supplement the larger scale EfW that has been proposed. These alternative technologies use pyrolysis and gasification capture carbon from organic waste to create biochar, syn-gas and bio-oil. Biochar is a valuable commodity with several uses, and syn-gas can be used to make aircraft fuel.

Multiple smaller EfW facilities could supplement or replace larger facilities and could be preferable to meet objectives of the NSW EPA Waste and Sustainable Materials Strategy 2041 and Net Zero targets, and to provide redundancy and resilience in waste infrastructure.

Waste facilities should be located closer to the generators of the waste:

Shipping Sydney's waste to Tarago or Parkes on trains is not conducive to resilient waste infrastructure planning. Sydney's waste transport to the regions was most notably affected by floods in 2022 which prevented the transport of waste from Sydney to Tarago for approximately 10 days. Due to the exemplary work of multiple Sydney councils, alternatives were found, but these were not sustainable in the long term. It became apparent from the 2022 example and others, that Sydney needs to process its waste closer to its origin and create infrastructure resilience in case of natural disasters. The current proposal for regional EfW would exacerbate the issue of a lack of waste infrastructure resilience.

In relation to the two proposed developments, it is suggested that the freight lines and waste transfer stations be assessed for efficiency, capacity and redundancy as part of the development assessment process. In this regard, alternative transport routes or stockpiling options should be considered to avoid creating a backlog of waste in the event of a disruption to the primary freight service. This would also aid to ensure a consistent feedstock for the facilities.

Further, the transport of this waste hundreds of kilometres is at a cost to Sydney's Councils and their ratepayers which is an excess cost on top of the existing waste levy.

(j) any other related matters.

Lifecycle analysis of EfW compared to landfill:

The NSW EPA acknowledges that there is a 'waste crisis' looming for Greater Sydney. Despite waste reduction efforts and circularly economy initiatives, the options for disposing of red bin waste is either landfilling or EfW. It has been demonstrated that EfW can be substantially better than landfilling based on lifecycle analysis as it has about equivalent or better carbon emissions[3] (compared to landfill implementing best practice methane capture) and has minimal comparative ongoing contamination management. EfW should therefore be strongly considered as part of a wider response to Sydney's waste crisis.

Lack of industry confidence:

Following the Government's rejection of recent EfW applications such as the Badgerys Creek facility, industry is reluctant to invest in EfW or in innovative waste technology in NSW. The Federal Government and State Government needs to ensure that appropriate planning is done to create certainty to allow businesses to invest in NSW to help solve Sydney's waste crisis.

Social Licence:

It is The Parks view that EfW will not be popular or accepted in NSW without proper state and federal government support, education and transparency. Despite extensive international adoption of EfW, little has been done to improve the social licence of EfW to

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[3] Malak Anshassi, Thomas Smallwood, Timothy G. Townsend, "Life cycle GHG emissions of MSW landfilling versus Incineration: Expected outcomes based on US landfill gas collection regulations", *Waste Management*, Volume 142, 2022, Pages 44-54

make it palatable to the NSW community. In this regard, the NSW and federal governments need to take ownership of the responsibility of public engagement; The responsibility of increasing the public understanding of EfW should not fall to local councils.

Chapter 9, Part 4 of the *Protection of the Environment Operations (General) Regulation 2022* designates four regional areas in which EfW is permissible. By limiting EfW to regional areas, it has created the perception that EfW is undesirable and unclean and therefore has negatively affected the social licence of EfW. It is recommended that the areas in which EfW is permissible is expanded to improve social licence and allow for the equitable treatment of Sydney's waste closer to its source.

Please feel free to contact our Regional Waste Coordinator Jeremy Manion by email at or Joanna Kubota, Executive Director of The Parks by email at should you have any questions.

Yours sincerely,

Joanna Kubota
Executive Director
The Parks, Sydney's Parkland Councils