Submission No 282

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

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Submission to the Parliamentary Inquiry into the proposed Energy-from-Waste Facilities in Regional New South Wales

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Contact details available on request. This submission is made in a private capacity as a councillor and landholder within the Parkes Shire region.

1. Purpose of Submission

This submission is provided to the Parliamentary Inquiry into the proposed Parkes Energy-from-Waste (EfW) facilities in Regional New South Wales.

It responds to the Terms of Reference (a–j) and reflects the perspective of a locally elected councillor and farmer operating within the Parkes Shire region.
As both a public official and a landholder, I have a dual responsibility: to uphold environmental governance and to protect the productivity, health, and reputation of our agricultural landscape.

2. Background and Local Context

Parkes is an agriculturally rich region that forms part of the Central West grain belt, producing grains and livestock, and increasingly integrating renewable energy and sustainable water practices.

As a councillor and farmer, my husband and I manage a mixed-farming operation that depends on clean water, fertile soil, and community resilience.

The proposed Parkes Energy Recovery Facility (EfW incinerator) sits within the Parkes Special Activation Precinct (SAP), a development area initially framed around sustainable, low-emission industries.

Introducing a high-emission combustion-based waste facility into this setting raises significant contradictions with both regional planning intent and local environmental priorities.

3. Governance, Planning and Policy Concerns

Under the Local Government Act 1993 (NSW), councillors have a statutory obligation to act in the interests of their community and to ensure sustainable management of the environment.

The 2021 decision by the NSW Government to ban Energy-from-Waste incineration in Sydney, the Central Coast, and Hunter, while allowing it in four regional zones, including Parkes, creates a two-tier environmental standard.

Evidence obtained through Government Information (GIPA) requests shows that no independent environmental or health studies were conducted to justify Parkes' inclusion. Parkes was selected for logistical convenience, its position on the Inland Rail, not because it was environmentally or socially suitable.

No independent health or environmental risk assessment was undertaken to justify this exemption. This decision undermines the principles of procedural fairness, scientific rigor, and regional equity. If EfW incineration is too risky for metropolitan populations, it is not

acceptable for regional communities that depend on clean air, fertile soils, and agricultural exports. This selective zoning of risk represents a two-tier environmental standard that fails the fundamental test of equity.

4. Environmental and Agricultural Implications

Even "best practice" EfW plants emit a complex mix of pollutants: fine and ultrafine particles, nitrogen oxides, acid gases, volatile organic compounds, heavy metals, and persistent organic pollutants. NSW's regulatory framework lags behind European Best Available Techniques (BAT) in multiple areas: weaker dioxin limits (0.1 ng/m^3 vs. 0.04 ng in the EU)[1], less frequent sampling, and inadequate monitoring for abnormal operations. European data show hundreds of breaches annually, even in "modern" facilities[2]. To ensure genuine protection, independent continuous emissions monitoring, ambient air testing, and long-term biomonitoring of soil and local food sources must be made mandatory.

The proposed EfW facility introduces risks inconsistent with the agricultural zoning and land-use objectives of the Parkes Shire. Combustion residues such as fly ash and bottom ash are known to contain heavy metals, dioxins, and furans. These contaminants can disperse through air, water, and soil, with the potential to enter food chains via crops, pasture, and livestock feed.

Even trace deposition can result in long-term soil degradation, reduced yield quality, and reputational harm to the "clean and green" image of regional NSW produce. Such contamination, or even the perception of it, could threaten export confidence and undermine decades of agricultural stewardship.

5. Greenwashing and Misleading Representations

The project proponent, Parkes Energy Recovery (PER), has marketed this facility using misleading "green" language. They claim the plant will "power 80,000 homes." In reality, electricity produced will serve industrial operations inside the Precinct.

They brand the project as a "circular economy" initiative, yet true circular economy models prioritise waste avoidance, product redesign, reuse, and recycling instead of incineration. Incineration destroys materials that should remain in productive circulation and produces toxic ash requiring hazardous disposal. The proponent's comparison of emissions to those of a "leaf blower" trivializes the presence of dioxins, furans, PFAS, and heavy metals, pollutants toxic even at trace concentrations. These statements constitute deliberate greenwashing. All such claims must be independently verified under consumer protection laws.

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[1] European Commission. (2019). *Commission implementing decision (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions for waste incineration.* Official Journal of the European Union.

[2] European Environmental Bureau. (2018, April). *A Wasted Opportunity? EU environmental standards for waste incineration plants under review.* Brussels: EEB.

6. Public Health and Community Wellbeing

Globally, modern EfW plants rely on mass-burn incineration with advanced gas cleaning. Even the best facilities in Denmark or Japan achieve only 25–30% electrical efficiency, and up to 65–70% only with district heating, not proposed here[3]. The Parkes facility will not recover heat; it will generate electricity at poor efficiency while emitting over 1,000 g CO_2-equivalent per kWh, higher than coal or gas.

Modern EfW plants continue to emit particulate matter, nitrogen oxides, heavy metals, and persistent organic pollutants. The World Health Organization recognises that fine particulate matter (PM2.5) poses health risks even below regulatory limits[4].

Studies across Europe and Asia have identified elevated risks of respiratory illness and reproductive disorders in populations living near incinerators, even where plants operate within legal limits[5].

In rural areas such as Parkes, where families rely on rainwater collection and home-grown produce, these risks extend beyond air quality to water and food safety.

7. Transport and Climate Considerations

The project proposes to transport approximately 600,000 tonnes of waste annually from metropolitan Sydney to Parkes, a round trip of over 1,000 kilometers.

This adds unnecessary transport emissions and undermines NSW's net-zero and circular economy targets.

If the waste is safe to process, it should be managed near its source; if it is unsafe for Sydney, it is not appropriate for Parkes.

8. Consultation and Community Confidence

Local residents were not consulted prior to Parkes' designation as an Energy-from-Waste precinct.
Community members, including some newly elected councillor's, became aware of the project only after the proponent's public announcement.

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[3] Hulgaard T, MSc IS (2018), "Integrating waste-to-energy in Copenhagen, Denmark". *Proceedings of the Institution of Civil Engineers - Civil Engineering*, Vol. 171 No. 5 pp. 3–10, doi: https://doi.org/10.1680/jcien.17.00042

[4] World Health Organization (WHO). (2021). *WHO global air quality guidelines: Particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide.* Geneva: WHO Press

[5] Candela S, Ranzi A, Bonvicini L, Baldacchini F, Marzaroli P, Evangelista A, Luberto F, Carretta E, Angelini P, Sterrantino AF, Broccoli S, Cordioli M, Ancona C, Forastiere F. Air pollution from incinerators and reproductive outcomes: a multisite study. Epidemiology. 2013 Nov;24(6):863-70. doi: 10.1097/EDE.0b013e3182a712f1. PMID: 24076993.

This absence of genuine engagement erodes trust and fails to meet the standards of informed consent required for major developments under NSW planning policy.

A project of this magnitude requires transparent communication, independent risk assessment, and local agreement, none of which have been adequately demonstrated.

9. Alternative Solutions for Residual Waste

There are viable, lower-risk alternatives consistent with the waste hierarchy and NSW Circular Economy Strategy[6], including:

- Investment in advanced recycling and material recovery facilities.
- Regional composting and anaerobic digestion for organic waste.
- Extended Producer Responsibility to reduce non-recyclable materials; and
- Mechanical-Biological Treatment to stabilize residual waste before safe disposal.

These methods align with the EU Waste Framework Directive, the UN Sustainable Development Goals, and NSW's Net Zero Plan, and would create local employment, support innovation, and maintain environmental integrity without exposing regional communities to industrial-scale incineration.

10. Recommendations

Based on the above evidence and local experience, I respectfully recommend that the Committee:

1. Reject the Parkes Energy-from-Waste proposal.
2. Commission an independent assessment comparing the full life-cycle emissions and economic costs of EfW against circular economy alternatives.
3. Require genuine community consultation and transparent risk communication for all major infrastructure projects.
4. Support investment in recycling, composting, and material recovery infrastructure as priority solutions for regional NSW.

11. Closing Statement

This submission reflects both my professional responsibility as a councillor and my personal commitment as a local farmer to safeguard the health, land, and livelihoods of the Parkes region.

I believe the decision before this Inquiry will set an important precedent for how New South Wales balances economic opportunity with environmental justice.

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[6] New South Wales Environment Protection Authority. (2019). *NSW Circular Economy Policy Statement – Too Good To Waste*. NSW Government. https://www.epa.nsw.gov.au/sites/default/files/19p1379-circular-economy-policy-final.pdf

On 20 May 2025, as a Parkes Shire Councillor, I submitted seventeen detailed questions directly to the NSW Environment Protection Authority (EPA) concerning the proposed Parkes Energy Recovery Facility. To date, I have not received any response.

This lack of replies constitutes a breach of the EPA's own *Code of Ethics and Conduct* and its *Charter of Engagement*, which explicitly commits the Authority to being outcomes-focused and to closing the feedback loop by:

- letting stakeholders know how their input has been considered,
- respecting that community representatives have taken time to engage,
- providing a timely response, and
- communicating outcomes and the reasons for decisions.

The absence of any reply undermines community trust and confidence in the integrity of the engagement process. It directly contradicts the EPA's stated principles of transparency, accountability, and respect for public participation. This failure of procedural fairness reinforces the broader concerns raised in this submission about the inadequacy of consultation and oversight.

I also wish to place on record that **over 6,000 members of the community have signed a petition opposing the proposed incinerator**. As elected councilors, we are here to serve, represent, and act in the best interests of our residents, and to listen to them. The strength of this opposition demonstrates not only public concern but also a shared understanding across our community that this project does not align with Parkes' environmental, social, or economic values.

Furthermore, Sydney and other metropolitan centers should be responsible for managing their own waste streams rather than exporting them to regional areas. Transferring metropolitan waste to the country for incineration represents a **lazy and short-sighted approach** to waste management - one that prioritises convenience over innovation and undermines the principles of recycling, circularity, and local accountability.

I respectfully request that the Committee take these matters into full consideration, and that the EPA's engagement practices, community feedback, and regional equity obligations be thoroughly examined as part of this Inquiry.

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