Submission
No 276

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

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

Introduction

I make this submission as a concerned NSW resident strongly opposed to the construction or approval of any new energy-from-waste (EfW) incinerator in regional NSW. Waste incineration is a dirty, outdated, and toxic technology that has no place in a modern, sustainable waste system. Far from being part of a "circular economy," incinerators destroy valuable resources, release toxic pollution, and burden surrounding communities—disproportionately those in rural and regional areas—with serious health and environmental risks.

The NSW Government has already recognised these dangers by prohibiting waste-to-energy incinerators in metropolitan Sydney. Extending such projects to regional areas like Tarago or Parkes is therefore discriminatory and unjust. The health of country communities is not worth less than the health of people in Sydney.

1. Waste Incineration is Toxic and Dangerous

Decades of international evidence confirm that waste incineration produces toxic emissions, including dioxins, furans, heavy metals (such as mercury and lead), fine particulate matter (PM2.5), and persistent organic pollutants. These contaminants are hazardous even at extremely low concentrations. Studies have linked exposure to incinerator emissions with increased risks of cancer, respiratory disease, endocrine disruption, birth defects, and developmental disorders (Tait et al., *Environmental Health*, 2020; Porta et al., *The Lancet Oncology*, 2009).

Modern "energy-from-waste" plants do not eliminate these risks. The European Environment Agency (EEA) has reported ongoing exceedances of dioxin and particulate limits near many of Europe's so-called "advanced" incinerators. In France, investigations around the Ivry-sur-Seine and Paris incinerators have found soil and air contamination by dioxins and heavy metals at levels above EU health guidelines (Le Monde, 2023; Greenpeace France Report, 2022).

There is no safe level of dioxin exposure. Once emitted, these compounds settle in soil and water, entering the food chain via crops and animal products. For agricultural communities such as Tarago—where families rely on rainwater tanks, home-grown produce, and livestock—the risk is especially acute. Once farmland or water supplies are contaminated, remediation is near impossible and contamination persists for centuries.

2. There is No Level of Monitoring or Regulation that Can Make Incineration Safe

Proponents claim that "state-of-the-art" emission control and continuous monitoring make incinerators safe. This is false and misleading. Continuous emission monitoring systems (CEMS) only measure a subset of pollutants and cannot detect many of the most dangerous compounds—such as dioxins, furans, and ultrafine particulates—in real time. Sampling for these substances is intermittent (often just twice per year) and can be manipulated by operators who run plants differently during testing periods to minimise emissions.

Even when strict licence conditions are imposed, compliance is unreliable. Enforcement is weak, and companies routinely breach their environmental obligations with little or no consequence. The NSW Environment Protection Authority (EPA) is chronically under-resourced and lacks the capacity to oversee complex, high-risk operations like large-scale waste incineration in remote areas.

Veolia's record at the Woodlawn facility near Tarago demonstrates precisely why "trust" cannot be the foundation of environmental protection. The company has repeatedly breached licence conditions, including odour emissions that extend up to 20 kilometres, leachate leaks into waterways, and waste spills from trucks. These breaches have all occurred in the last three years - since Veolia's application to build an incinerator - and continue to be regularly uncovered. Despite ongoing community complaints and EPA notices, Veolia continues to operate with impunity. To now reward this same operator with approval for an incinerator—one of the most dangerous types of industrial facilities—is indefensible.

3. Regional Siting is Discriminatory and Environmentally Unjust

The NSW Government's *Energy from Waste Infrastructure Plan* explicitly bans incinerators in Sydney because of the unacceptable risk to human health and air quality. Yet it allows the same facilities in rural and regional communities. This two-tiered approach amounts to environmental discrimination.

Tarago and other small communities depend on tank water collected from their roofs, provide vital agricultural products, and have limited healthcare and emergency infrastructure. The siting of toxic industries in such locations is a classic example of environmental injustice—placing pollution where people have the least political power and resources to resist. It treats regional residents as expendable.

4. Incineration Undermines the Circular Economy

True circular economy principles prioritise waste prevention, reuse, recycling, repair, and composting. Incineration does the opposite: it destroys recoverable materials, creates toxic ash that must be landfilled, and locks councils and governments into long-term feedstock contracts that discourage waste reduction.

For every tonne of waste burned, up to 30 per cent remains as toxic bottom and fly ash requiring disposal in hazardous waste landfills. Burning waste also releases large quantities of carbon dioxide—making incineration one of the most greenhouse-intensive ways to manage waste (Zero Waste Europe, *Climate Impact of Waste Incineration*, 2022).

The European Commission and the OECD have both stated that waste incineration is **not** part of the circular economy and should be phased out in favour of higher-order solutions. Even Japan, once a heavy user of incineration, is moving toward resource recovery and zero-waste systems due to public health and environmental concerns.

5. "New Technology" is No Better than the Old

Veolia and other proponents often claim their "next-generation" EfW facilities use "advanced pollution control" or "plasma gasification" that make them safe. These claims are not supported by independent evidence.

Recent reports from Western Europe show that so-called "advanced" incinerators continue to emit dioxins and ultrafine particles, contaminate nearby soils, and contribute significantly to local air pollution. The Paris region's incinerators—some among the most modern in the world—have been linked to elevated dioxin levels in chicken eggs and milk within several kilometres of the plants (Greenpeace France, 2022; French National Health Agency, 2023).

If this technology cannot be made safe in highly regulated, well-resourced countries, it certainly cannot be considered safe in rural NSW. The physics of combustion do not change with a new label—burning waste inevitably produces toxic residues.

6. Veolia is Already Seeking to Weaken Conditions

It is deeply concerning that Veolia is already lobbying via EMM Consulting to loosen the environmental conditions proposed for its Tarago incinerator. Reports indicate the company is seeking exemptions from key air emission standards and operational limits that were introduced precisely to protect nearby communities.

This shows that even before construction, the operator knows it cannot meet the standards promised to the public. If these conditions are weakened now, what will stop further erosions once the facility is built? History shows that once an incinerator begins operation, governments rarely, if ever, shut them down despite non-compliance—because of sunk costs and contractual obligations. Communities are left to bear the consequences.

7. Who Pays When Contamination is Found?

The Inquiry must ask a critical question: **who will compensate local farmers, families, and businesses when contamination from an incinerator is detected?**

Experience across Australia demonstrates that when contamination occurs—from PFAS firefighting foams, industrial discharges, or mine tailings—the government and taxpayers ultimately bear the cost. The Commonwealth has already paid tens of millions of dollars to property owners near PFAS-contaminated Defence sites such as Oakey (Qld), Katherine (NT), and Williamtown (NSW). The area of prime agricultural land that will likely be contaminated if these incinerators go ahead is substantially greater than the aforementioned Defence sites.

Once agricultural land is contaminated with persistent pollutants such as dioxins or heavy metals, crops and livestock can become unsafe for sale. This can devastate regional economies and destroy community livelihoods. Veolia's commercial contracts will not cover such losses, and no amount of post-event "monitoring" will restore public confidence in local produce.

8. There Are Safer and Smarter Alternatives

The supposed "waste crisis" does not require incineration. Proven alternatives exist:

- **Expanded recycling and composting**, supported by domestic re-processing infrastructure.
- **Mandatory producer responsibility** for packaging and e-waste.
- **Investment in repair and reuse industries**, creating regional jobs.
- **Education and incentives** for waste avoidance.

These options reduce waste generation, save energy, and protect community health—without the irreversible harm caused by incinerators.

Conclusion

Waste incineration is not clean, safe, or compatible with a sustainable circular economy. It poisons the air, water, and soil of the communities in which it operates. It entrenches environmental injustice by targeting rural and regional towns already burdened by pollution. It relies on unproven claims of safety that have been contradicted by decades of international evidence.

Veolia's record at Woodlawn shows that even with licence conditions, oversight fails and pollution follows. The company's lobbying to weaken conditions before a plant is built confirms it cannot be trusted to operate one safely.

The people of regional NSW deserve the same protection from toxic industry as those in Sydney. The NSW Parliament must reject all proposals for new energy-from-waste incinerators and instead invest in genuine circular-economy solutions that keep resources—and people—safe.

(Key references used: Tait et al., "Systematic Review of Health Risks from Waste Incineration," Environmental Health, 2020; Porta et al., "Health Effects of Municipal Waste Incineration," The Lancet Oncology, 2009; Greenpeace France, "Incineration Pollution in the Paris Region," 2022; Zero Waste Europe, Climate Impact of Waste Incineration, 2022; European Environment Agency, Air Pollution from Industrial Facilities, 2021.)