Submission No 349

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Name: Name suppressed

Date Received: 29 October 2025

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To whom it may concern,

I am writing to formally express my concern and opposition to the proposed waste-to-energy incinerator project in Parkes, NSW and the technology in general. While I understand the need to address waste management, I am deeply concerned about the potential environmental, social, and health impacts that this proposal would have on the local community.

As a concerned citizen, a Civil Engineer, a farmer and a mother, I believe it is vital to consider scientific evidence and public health research before proceeding with such an initiative. Below are several key points that I urge you to consider:

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1. Health Risks & Human Rights issues

The health risks associated with waste-to-energy incinerators have been well-documented internationally. The NSW Government has repeatedly stated that thermal WtE facilities pose risks to human health, air quality and the environmental – risks so significant that these incinerators have been banned in Sydney and Greater Sydney with legislation changed to prevent any future investigation into these areas. The NSW Department of Planning and Environment stated in 2022 that "The NSW Government has made changes to the planning system to ban the development of thermal energy from waste facilities across Greater Sydney, with limited exceptions".

The EPA explains that this policy applies the "precautionary principle" recognising "a greater risk of harm to human health in proximity to high population areas" in their 'Energy Recovery Regulation Consultation 2022.

If these risks are unacceptable in Sydney, then they are unacceptable in regional rural areas. If the argument is there is less population in regional areas then in Sydney this is a human rights issue. The technology is not 'safer' in a regional area than in a metropolitan area. The pollutants are the same, the number of people impacted, and load on the tax funded medical system will be less, which is another way of saying that the regional populations do not have the same human rights as metropolitan populations to a safe and healthy environment. It also is another way to say, that the number of persons impacted in regional areas will be less than metropolitan areas thereby producing a much lower load and thereby cost on the public health system.

There is a vast range of resources publicly available condemning the technology of WtE due to the pollutants it produces.

For example:

- International Agency for Research on Cancer (IARC), classify dioxins and furans as carcinogenic to humans.
- Research from the University of Exeter has shown that people living near incinerators face higher risks of developing respiratory problems, asthma, and other chronic illnesses. Children and vulnerable populations are especially at risk, as their developing respiratory systems are more sensitive to airborne pollutants.
- A systematic review by the Australian National University found associations between incinerator emissions and cancers, congenital anomalies, infant deaths, and miscarriage (ANU Open Research Repository, 2020).
- A Turin, Italy human-biomonitoring study found measurable increases in chromium levels in residents after a WtE plant began operating (PubMed 32058936).
- In the Baltimore, USA case (Curtis Bay Energy), emissions disproportionately affected low-income communities, constituting an environmental-justice concern and implicating the right to health (PMC12236935).
- Moreover, a study conducted by Harvard University concluded that communities living in close proximity to incinerators often suffer from higher rates of cancer and birth defects, which can be attributed to exposure to toxic emissions and chemicals released during the burning of waste.

Although New South Wales lacks a formal Human Rights Act, the State and Commonwealth governments remain bound by Australia's international human-rights obligations — including the right to the highest attainable standard of health, as recognised in Article 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) and the Convention on the Rights of the Child (CRC), which guarantee children's rights to a safe, clean, and healthy environment. In July 2022 the UN General Assembly declared that the right to a clean, healthy and sustainable environment is a fundamental human right.

The proposed facility threatens to undermine these obligations.

The Parkes and wider community, which includes children, families, and has a high proportion of low income families, is entitled to equal protection from preventable environmental health risks. Approval of this facility without conclusive safety evidence would contradict Australia's international commitments to protect citizens' health. It would be a human rights breach.

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2. Risks to Agriculture, Food Safety, and the Local Economy

Parkes is a key agricultural region. It produces a significant proportion of cereals, legumes and meat products with the second largest animal saleyards in the southern hemisphere. The proposed facility threatens:

- Soil and crop contamination from airborne deposition of heavy metals and dioxins;
- Bioaccumulation of toxins in livestock and dairy products; and
- Potential reputational damage to the region's food exports, which rely on clean and green branding.

Such outcomes directly undermine the underlying determinants of health recognised by the Australian Human Rights Commission — including access to safe food, clean air, and uncontaminated water.

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3. Inadequate Alignment with Environmental and Planning Law Obligations

Under the Environmental Planning and Assessment Act 1979 (NSW) and Protection of the Environment Operations Act 1997 (NSW), decision-makers must consider public health and the principles of ecologically sustainable development (ESD).

Granting approval to a high-emission industrial incinerator in a rural farming zone, without irrefutable evidence of safety, would breach the precautionary principle and fail to satisfy the requirement to act in the public interest.

The Environmental Impact Statement (EIS) and Human Health Risk Assessment (HHRA) for this project must be independently reviewed for adequacy. If the EIS fails to include baseline biomonitoring, comprehensive children's health assessment, and cumulative exposure pathways (including soil, water, and food-chain contamination), it should be deemed insufficient under the EP&A Act.

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4. Breach of Australia's Human-Rights Commitments

Even without a NSW Human Rights Act, the government's decision-making should reflect Australia's binding international human-rights obligations.

The UN Committee on Economic, Social and Cultural Rights has held that governments must prevent third-party industrial activities from harming citizens' health. The European Court of Human Rights has also found that exposure to toxic waste and air pollution can violate the right to life and private/family life (e.g., *Cordella and Others v Italy*, 2019).

Approving a large-scale incinerator with potential to harm residents' health and livelihoods would place Australia at odds with these international standards.

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5. Community Consultation and Procedural Fairness

Many local residents including myself report inadequate consultation and insufficient disclosure of health-risk information. Proper, transparent, and informed participation is a key human-rights principle, especially for regional rural communities whose livelihoods and health will be directly affected. It appears to me, that the approvals and planning thus far of this facility have been undertaken quietly without consultation or public knowledge in a regional area with a small voice in hopes that it could be passed with minimal opposition. This feels very predatory. What documentation would be found proposing a 'quiet' process if a GIPPA request was made?

I respectfully request that you review the State Government, and Parkes Shire Councils conduct in regards to the inception and progression of this solution of waste management, as well as the suitability of this technology on addressing a more global issue of waste generation and resolution. I feel it is essential to prioritize the human rights of regional areas, especially our children and their

long-term health, safety, and well-being while also addressing the urgent need for sustainable waste management and clean energy solutions.

Thank you for your attention to this critical issue.

Yours sincerely,

Concerned local community member