Submission No 479

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

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To: The Chair and Members, Select Committee on inquiry into the NSW Government's investment in waste-to-energy technology

From: Keelah Lam

Date: 28 October 2025 **Subject:** Submission: Inquiry into Waste-to-Energy (WTE) Investment in NSW

1. Introduction

I am a grandmother and a long-term resident of NSW. I grew up in Sydney in the 1940s and have been actively involved in community-level waste avoidance and policy since 1993. I am making this submission to express my strong and informed objection to any public or private investment in Waste-to-Energy (WTE) incineration.

My lived experience has proven to me that large-scale waste is not inevitable; it is a product of industrial and policy choices. My primary position is that WTE is a dangerous, costly, and short-sighted non-solution that threatens public health and undermines a sustainable future.

I urge the Committee to recommend a comprehensive, statewide 'Zero Waste' policy, underpinned by Extended Producer Responsibility (EPR) legislation, as the only viable path forward.

2. Scope of this Submission

While other submissions will provide extensive scientific data on the technical and health dangers of WTE, my submission will focus primarily on the terms of reference:

- **(i) alternative solutions to reduce and manage residual waste produced by Greater Sydney;** and
- **(j) any other related matters,** specifically the systemic policy failures that have led to this point and the urgent need for a legislative paradigm shift.

3. Key Recommendations

I respectfully recommend that the Select Committee:

1. **Ban all new Waste-to-Energy (WTE) incineration facilities** in NSW.
2. **Enact comprehensive Zero Waste Legislation** as the state's primary waste management principle, replacing ambiguous terms like "circular economy" and "waste minimisation" with clear, measurable avoidance goals.
3. **Introduce robust Extended Producer Responsibility (EPR) Legislation.** This must include tracked, meaningful deposit/refund systems to ensure industry is financially and materially responsible for the full lifecycle of its products.

4. **Redirect all state funding** and subsidies (including from bodies like ARENA and CEFC) away from WTE and towards scaling up proven waste avoidance, reuse, and onshore recycling infrastructure.

4. The Case Against Waste-to-Energy (WTE) Incineration

My objection to WTE is based on its well-documented failures in health, economics, and environmental policy.

4.1. Public Health & Environmental Toxicity WTE facilities are known to emit dioxins, mercury, Persistent Organic Pollutants (POPs), and other carcinogens, posing significant risks to nearby communities, farmlands, and water catchments. The process leaves a legacy of toxic fly-ash—approximately 30% of the original waste volume by weight—which must be landfilled, creating a secondary, concentrated pollution source. The proposal to use this ash in building materials or roadfill is unacceptable, as it guarantees the leaching of toxins into our soil and waterways.

4.2. Undermining Waste Reduction & Recycling WTE plants are high-cost, long-life assets that require a constant, high-volume "feedstock" of waste to remain operational. This creates a powerful financial disincentive to pursue genuine waste reduction and recycling. As seen in Sweden, which must now import waste, these facilities "lock in" a wasteful system for decades, directly competing with and undermining the more sustainable recycling and composting industries.

A recent example from China illustrates this conflict perfectly. After a massive overinvestment in WTE incineration plants, China's successful implementation of improved waste sorting and recycling practices has left these new, expensive facilities "starving" for fuel. This demonstrates that WTE is a poor, long-term investment that becomes obsolete as soon as a society implements effective waste avoidance policies.

4.3. A False Climate & Energy Solution Burning waste, particularly plastics, is not a "green" or "renewable" energy solution. WTE incineration generates higher carbon emissions per unit of energy than coal-fired power. Plastics are a fossil fuel product. Classifying their incineration as "renewable"—and providing ARENA or CEFC grants for it—is a distortion of policy and a misallocation of public funds that should be supporting genuine renewables like solar and wind.

4.4. A History of Policy Failure & Community Harm I have personally witnessed the failures of state waste policy. As a member of the NSW State Waste Advisory Council, I observed the 1995 Waste Act fail due to industry pressure. The "solution" then was the Woodlawn mega-tip, which has inflicted environmental harm on the Tarago region for decades. The proposal to now add a WTE plant in this long-suffering community is unconscionable. We have seen similar failures, such as Boral's attempt to burn tyres in the Southern Highlands, which was reportedly halted due to toxic emissions.

5. The Viable Alternative: Zero Waste & Producer Responsibility

The only genuine solution is to address waste "at the source," not at the "end of the pipe." This requires a systemic shift from waste "management" to waste *avoidance*.

5.1. Proven, Practical Solutions These are not theoretical ideals. I have practical experience in this area, stemming from my involvement in Manly Council's 1993 'Earthworks' pilot program, which led to the long-running Manly Food Co-op for waste-free shopping. We know these systems work:

- **Container Deposit Legislation (CDL):** South Australia's system, in place since 1978, has proven effective. The key is a *meaningful* deposit to incentivise return, which in turn provides a clean, sorted stream for recycling.
- **Reusable Systems:** My local dairy in the 1990s collected, sterilised, and refilled glass milk bottles, with each bottle averaging 100 uses. This model is efficient, low-energy, and has been abandoned for a "convenience" model that treats glass as a single-use roadfill component—a gross mismanagement of resources.

This failure is systemic. Most glass containers today are not recycled back into new containers due to key challenges in collection, contamination, and economic factors. While glass is infinitely recyclable, the current co-mingled process is easily disrupted, leading to mass "downcycling" into lower-value products like roadfill instead of true "closed-loop" recycling.

- **Clean Sorting at Source:** EPR and CDL systems produce clean, separated materials. This contrasts sharply with the contaminated, low-value material from co-mingled kerbside recycling, which requires dirty, hazardous manual sorting.

5.2. The Legislative Solution: Extended Producer Responsibility (EPR) The critical missing piece is Extended Producer Responsibility (EPR). By making manufacturers legally and financially responsible for their packaging and products at end-of-life, we create an unavoidable market incentive to design for durability, repair, refilling, and disassembly.

This is the only way to combat the "designed obsolescence" that profits manufacturers while leaving the public with the environmental and financial burden of disposal.

6. Conclusion

Waste-to-Energy incineration is a 20th-century "solution" that poses a 21st-century threat. It is a short-sighted, cynical fix that creates more long-term problems than it solves, all while diverting capital and focus from the only real solution: stopping waste at its source.

Intergenerational equity demands that we do not burden our children and grandchildren with toxic ash and polluted air. I urge the Committee to reject WTE unequivocally and

embrace the proven, sustainable, and necessary path of Zero Waste and Extended Producer Responsibility.

Thank you for the opportunity to make this submission.