Submission No 502

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

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To:

The Select Committee on Proposed Energy from Waste Facilities

NSW Legislative Council

Parliament House

Sydney NSW 2000

Introduction

We, Christopher and Neralie Cole, of Allambie Cook's Myalls write to express our strong opposition to the proposed Energy-from-Waste (EfW) incinerator at Parkes.

This project poses unacceptable risks to agriculture, human health, environmental integrity, tourism, and the economic security of regional communities. It represents an inequitable transfer of Sydney's waste burden to rural NSW and threatens decades of investment in sustainable land management and regional identity.

This submission addresses multiple Terms of Reference, including: (a) adequacy of current waste infrastructure; (b) emissions and their spread; (c–d) health impacts and soil contamination; (e) agricultural impacts; (f) Special Activation Precincts and First Nations considerations; (g–h) international best practice and regulatory comparisons; (i) alternative solutions; and (j) related matters including environmental justice and community consent.

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1. Regional Justice and Government Priorities

The Parkes incinerator proposal is not just a technical issue of waste management — it is a political and moral question about how this State treats its regions.

This project continues a pattern in which regional NSW is asked to absorb the burdens of decisions made for Sydney's convenience — whether through environmental risks, service withdrawals, or inequitable infrastructure siting. While metropolitan communities receive the benefits, regional communities are left with the risks.

The facility would never be tolerated in Sydney's suburbs. Yet Parkes is expected to live indefinitely with the fallout — literal and figurative — of Sydney's waste. This is environmental outsourcing dressed up as policy.

Why does this government continue to punish and degrade regional NSW, treating it as a dumping ground rather than a partner in sustainable development? Regional communities deserve equal protection, equal respect, and a genuine voice in decisions that shape their future.

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2. Agricultural Contamination & Food Chain Risk

EfW facilities emit persistent pollutants such as dioxins, furans, PFAS, heavy metals, and ultrafine particulates. These contaminants can settle on farmland and in water catchments, entering the food chain through crops and livestock.

Contamination is effectively irreversible — ordinary agricultural practices cannot remove persistent organic pollutants from soil and water. Once these compounds are present, they can persist for decades, affecting soil productivity, water quality, and market reputation.

International buyers, particularly in the EU, are increasingly testing for PFAS and dioxins. Even a suspicion of contamination can lead to loss of market access, price suppression, or exclusion from premium markets. Farmers are price takers; they cannot negotiate higher prices to offset perceived risks.

This contamination risk is not occurring in a vacuum. Family farms in regional NSW are already under intense economic pressure from drought, floods, rising input costs, and volatile commodity prices. Introducing a new layer of uncertainty through potential contamination — or even just the perception of it — adds another destabilising factor to farm viability.

For many family operations, margins are already tight. A reduction in farm-gate prices or increased testing and compliance costs could make the difference between continuing

intergenerational farming or forced exit from the industry. These are real economic risks with permanent consequences, not theoretical possibilities.

Siting an incinerator in an agricultural region exposes producers to long-term, hard-to-reverse contamination risks and immediate economic vulnerability. It undermines the resilience of family farms and the broader agricultural economy they sustain.

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3. Regulatory Gaps & Monitoring Deficiencies

The NSW Chief Scientist's materials acknowledge that not all pollutants are continuously monitored. Mercury and other persistent pollutants can still rely on periodic sampling, leaving blind spots between tests where harmful emissions may go undetected.

While real-time air monitoring is proposed, baseline soil, water, and biota testing is not mandatory. Without robust baselines, future "before/after" comparisons lack meaning. This undermines the ability to prove or disprove contamination, placing the burden on farmers and communities rather than the operator.

These gaps have direct economic consequences. Export markets such as the European Union conduct their own residue testing on imported agricultural products, including checks for dioxins, PFAS, and other persistent pollutants. If NSW's monitoring regime fails to detect contamination promptly, international buyers may detect it first — with serious consequences for market access, price, and reputation.

Inadequate monitoring increases the risk that contamination will go unnoticed until export testing occurs, at which point the damage to Australia's "clean and green" reputation — and to individual farming businesses — may already be done. Without legally enforceable baseline sampling and real-time public reporting, NSW is exposing farmers to risks they cannot control and will be forced to bear alone.

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4. Adequacy of Current Infrastructure (TOR a)

NSW's waste and resource recovery network has significant untapped capacity. Scaling organics recycling and composting, improving materials recovery, and strengthening Extended Producer Responsibility (EPR) can divert large volumes from landfill without the need for incineration.

EfW infrastructure locks NSW into high-emission, capital-intensive assets for decades, reducing the state's ability to adapt to more sustainable upstream waste reduction strategies as technology and policy evolve. Evidence from circular economy policies around the world shows NSW can meet its future waste needs through recycling, composting, and EPR, making incineration both unnecessary and a long-term financial risk.

Importantly, waste should be managed where it is generated. If people choose to live in high-density urban centres, then the responsibility — and the cost — of managing that waste should remain in those communities. Metropolitan areas must invest in better recycling systems, infrastructure, and behavioural change rather than exporting their waste burden to regional NSW.

The cost of Sydney's waste problem should not be borne by regional communities, who neither create the problem nor benefit from the infrastructure. Shifting the burden onto Parkes is not good planning — it is cost-shifting and environmental inequity.

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5. Land Use Conflict & Biodiversity Impacts

Parkes is a productive agricultural hub (grains, livestock, fibre) and habitat for species including the Superb Parrot and woodland-dependent fauna. Fallout from EfW incinerator emissions risks undermining decades of investment in revegetation and wildlife corridor projects developed by Landcare groups, local councils, and community organisations.

Siting a large incinerator in this landscape is incompatible with agricultural zoning, biodiversity goals, and regional planning objectives. It places heavy industrial infrastructure directly adjacent to productive farmland and sensitive ecosystems, in clear conflict with established land use priorities.

The proposal also raises serious questions under Australia's international legal obligations, including:

- The **Stockholm Convention** on Persistent Organic Pollutants.
- The **Convention on Biological Diversity**.
- Commitments under the **Basel Convention**.

Allowing such a facility to operate in a sensitive agricultural and ecological region is inconsistent with the spirit of these international agreements.

Many families, including ours, choose to live and work in regional Australia precisely to avoid the smog, congestion, and pollution of metropolitan areas. To now have a metropolitan waste incinerator imposed on our community is an unacceptable reversal of that choice.

6. Community Health & Mental Wellbeing

Beyond physical exposures, there are profound mental health impacts associated with living under ongoing environmental uncertainty. Residents will experience sustained anxiety about the safety of their water, soil, produce, and property values — not for a short period, but indefinitely.

For farming families, the burden is intensified by financial strain and deep concern for their children's health. Questions like "Is our water safe?" or "Should our kids eat from the veggie patch?" become part of daily life.

There are also social consequences: potential new residents and those with various professional skills may choose not to move to Parkes, while existing families may decide to leave the region. Over time, this can erode community stability and regional development — all while Sydney remains insulated from these consequences.

This psychological and social burden would be borne indefinitely by Parkes, not Sydney.

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7. Economic & Insurance Risks

Contamination liability is typically excluded from rural insurance policies. A single contamination incident could financially devastate farming families and rural businesses. Property values in affected areas are likely to decline, discouraging agribusiness investment and regional development.

This must be understood in context: farming in NSW is already economically tough. Families are battling drought, floods, rising input costs, falling commodity prices, and tightening credit. How are they expected to stay viable when new, uncontrollable contamination risks are added on top? Farmers are price takers, not price makers.

This project benefits Sydney by solving its waste problem, yet imposes both environmental and economic burdens on regional communities. It is fundamentally inequitable and breaches the principle of environmental justice.

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8. Special Activation Precinct & First Nations Considerations (TOR f)

The Parkes Special Activation Precinct (SAP) is intended to promote sustainable regional economic development, attract investment, and support innovation. Positioning a metropolitan-scale waste incinerator within or near this precinct is fundamentally at odds with that vision.

Additionally, there are significant implications for First Nations communities, who have longstanding cultural and spiritual connections to the land and waterways. Proper consultation is required under NSW planning frameworks and international agreements — yet there is no clear evidence this has occurred at the depth warranted.

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9. International Case Studies: Lessons from Abroad

International experience shows that once EfW plants are built, waste diversion targets stagnate, emissions persist, and communities face long-term economic lock-in.

- In **Europe**, initial promises of "clean energy" and "jobs" gave way to trade risks and dependency on waste.
- In **the US**, communities near incinerators in Baltimore and Detroit experienced declining property values and health concerns.
- In **Japan**, legacy dioxin contamination led to expensive remediation programs and stricter standards.

The lesson is clear: incinerators create structural dependency on waste, locking communities into high-cost systems for decades.

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10. International Best Practice (TOR g)

International best practice in waste management focuses on waste minimisation, producer responsibility, and circular economy solutions, not incineration. Many EU countries that once embraced incineration are now scaling back.

Best practice also includes keeping responsibility where the waste is generated. NSW should follow this model — not shift metropolitan waste burdens onto regional communities.

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11. Regulatory Comparison — NSW vs International (TOR h)

Compared to the EU and Japan, NSW's monitoring and enforcement frameworks are significantly weaker, particularly regarding continuous emissions monitoring, baseline environmental testing, and public reporting.

This exposes regional communities to higher risks without corresponding protections.

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12. Regional Fairness & Environmental Justice

This proposal lays bare a double standard in how the Government treats regional NSW. Sydney generates the waste — but regional communities are expected to live with the consequences.

Regional communities contribute enormously to the State's economy through agriculture, mining, tourism, and renewable energy. Yet when it comes to infrastructure decisions, they are often treated as expendable backdrops for metropolitan convenience.

Environmental justice demands that no community should bear disproportionate environmental burdens without consent.

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13. Regional Reputation, Tourism and Economic Impact

Parkes has built a reputation as a vibrant regional centre and tourist destination, known for agriculture and cultural events such as the **Parkes Elvis Festival**.

Tourism depends on clean air, open landscapes, and a positive identity. Hosting a metropolitan waste incinerator threatens to damage that reputation, deter visitors, and undermine economic development.

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14. Precedent for Community Votes — National Radioactive Waste Facility

The Commonwealth's National Radioactive Waste Management Facility process provides a clear precedent for community consent in the siting of high-impact infrastructure.

In Kimba, South Australia, residents participated in a formal Australian Electoral Commission ballot in 2019. The Federal Government made it clear that the project would only proceed if there was broad community support.

The same principle should apply here.

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15. Alternative Solutions Exist

Genuine circular economy strategies offer safer, more sustainable ways to handle residual waste:

- Organics recycling and composting hubs.

- Anaerobic digestion to produce biogas and fertiliser.
- Extended Producer Responsibility (EPR) and plastic bans to reduce waste at its source.

These solutions create regional jobs and enhance, rather than endanger, agricultural and environmental assets.

Conclusion

When contamination is permanent, monitoring incomplete, trade and tourism risks are real, and agricultural identity is at stake, the precautionary principle must prevail.

The outfall from the short term gains of the plastic industry and incinerator operators have the potential to undermine the future of our regional community in terms of its clean green produce, its environment, its habitat and productivity.

At a time when the world is trying to combat the fallout from pumping pollutants into the air it appears totally irresponsible to introduce a system which intentionally relies on doing just that.

A significant percentage of the incinerator's input will result in a toxic ash with an indefinite lifespan, stored within our community, placing yet another unacceptable risk on us..

Let's learn from our past mistakes and not perpetuate them. Don't forget we were all told asbestos and silica were both harmless.

We urge the Committee to:

- Reject the Parkes EfW incinerator;
- Prioritise circular-economy alternatives that strengthen regional communities and eliminate the need for toxic short term solutions to waste dispodal .

Should sanity not prevail

- Require formal community consent (AEC-run ballot);
- Mandate independent baseline testing and real-time public monitoring;

References

European Parliament (2008); WHO Europe (2013); Environmental Integrity Project (2017); Baltimore Sun (2014); Japan Times (1999); Ministry of the Environment Japan (2001); Regulation (EC) No 1881/2006 and amendments.