Submission No 497

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Name: Name suppressed

Date Received: 31 October 2025

Submission to NSW Legislative Inquiry into Waste-to-Energy

Introduction

My family and I are residents living near Tarago, New South Wales. We have been living off-grid for almost twenty years – doing our bit for the environment. We do our best to recycle and reuse what we can – and produce minimal rubbish.

Please find below our input into the NSW Legislative Inquiry into Waste-to-Energy. We will be happy to discuss any points raised in our submission if requested. Veolia's current proposed incinerator offers a unique opportunity to extrapolate the existing behaviour of a proponent to demonstrate what can be expected in the future.

My submission also contains examples based on Veolia's existing operations and previous development applications (both here in Australia and the reference facility in the UK). These examples provide insight into what can be expected should an incinerator be approved.

Note: Where possible I have provided references in this submission. However I work full-time and have not had sufficient time to put together a higher quality submission. Please feel free to contact me if there is any requirement to clarify any statements I have made. I will be happy to back things up with relevant references.

(a) the performance of the technologies proposed for the Tarago and Parkes Energy Recovery Facilities as compared to leading thermal technologies employed in "state of the art" facilities internationally, noting such technologies as proposed are not employed anywhere else on the Eastern seaboard

Veolia's EIS for the proposed Tarago incinerator claims emissions of 146,892 CO_2 / year (table 6.3 of Appendix Q). According to the BAT Reference Document for Waste Incineration[1] (referenced in Veolia's EIS, Appendix L(ii)), for every tonne of MSW, approximately 0.7-1.7 t CO_2 is generated.

Carbon dioxide
For every tonne of municipal waste combusted, approximately 0.7–1.7 tonnes of CO_2 are generated.

Because municipal waste is a heterogeneous mixture of biomass and fossil material, the portion of CO_2 from MSWIs of fossil origin (e.g. plastic) which is considered relevant to climate change is generally in the range of 33 % to 50 %.

Figure 1 *Extract from BAT reference guide, 2019*

Based on this we can calculate the CO_2 emissions for Veolia's proposed incinerator to be somewhere between 266,000 and 646,000 tonnes CO_2 / year (based on a throughput of 380,000 tpa of waste). Veolia's claim of 146,892 CO_2 / year appears to be approximately half of what is considered normal.

The reference facility used by Veolia is based in Staffordshire UK (license number HP3431HK). According to UK Government data sources[2], in 2023 the reference facility emitted (among other emissions) 399,741 t CO_2. This figure varies significantly from the values being put forward by Veolia in the GHG Impact Assessment for the proposed Tarago incinerator. Table 1 contains the most recently reported three years of data.

Year	CO_2 (tpa)	N oxides (tpa)	Ch and compounds (kg)	PM2.5 (kg)	Arsenic (kg)	Dioxins and furans (kg)
2021	365,740	379	11,215	<1,000	<1.0	<0.0001
2022	433,394	407	13,728	<1,000	<1.0	<0.0001
2023	399,741	387	15,142	1,183	1.5	0.0005

Table 1 *Actual emissions from the Staffordshire incinerator – used as the reference facility for the proposed Veolia incinerator at Tarago. The CO_2 emissions are much larger than claimed.*

The Staffordshire reference facility is operational, and this raises the question over accuracy of the GHG Impact Assessment contained in the proposed Tarago incinerator. The waste in Staffordshire is not transported by train. The Staffordshire reference facility also does not have a Bioreactor with fugitive emissions to consider. It should be expected the emissions from Veolia's

1 https://eippcb.jrc.ec.europa.eu/sites/default/files/2020-01/JRC118637_WI_Bref_2019_published_0.pdf

2 https://www.data.gov.uk/dataset/cfd94301-a2f2-48a2-9915-e477ca6d8b7e/pollution-inventory

proposed incinerator at Woodlawn would exceed those of Staffordshire by at least the fugitive emissions from the existing Bioreactor (proportional to the incineration volumes and calorific values of waste).

According to Veolia's planning submission on the Staffordshire incinerator (Appendix 6.1, Air Quality Technical Report, UK Application reference number SS.10/16/636 W)[3], chart 6.2 shows the predicted CO_2 emissions from their incinerator would be about 100,000 tpa CO_2 (see Figure 2).

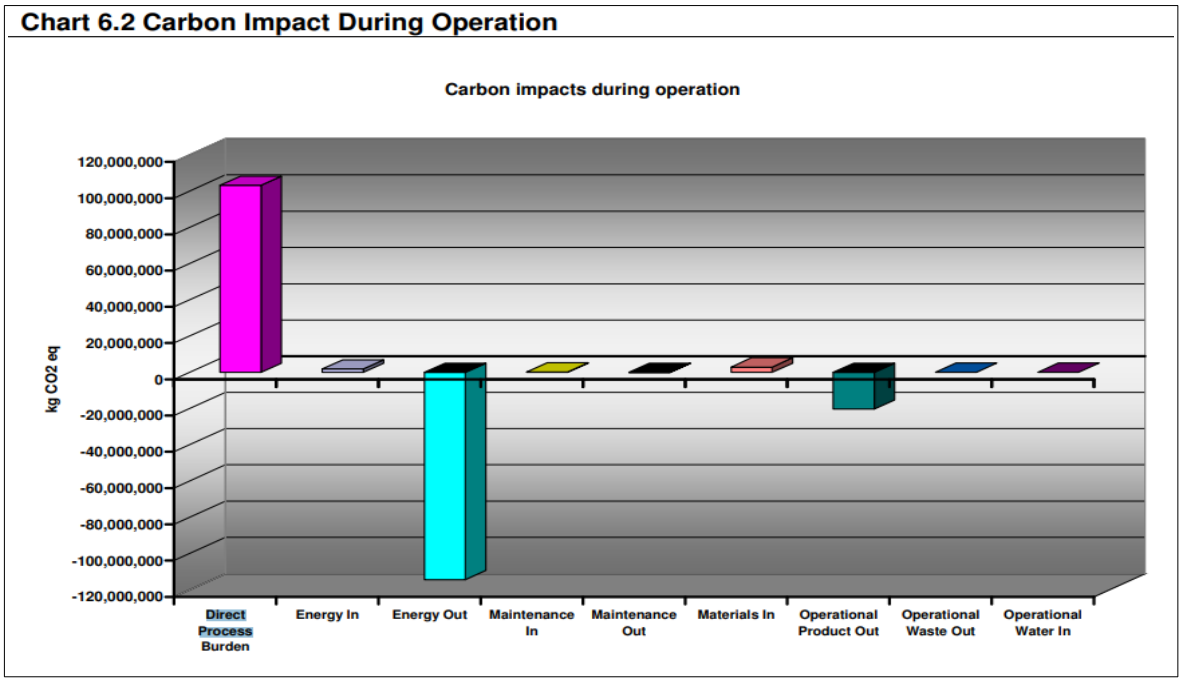


Figure 2 *Extract of Appendix 6.1 from Veolia's planning application for Staffordshire, UK. Note the CO_2 emissions claimed are around 100,000tpa – yet annual reporting shows over 300,000tpa!*

This indicates Veolia is consistently understating CO_2 emissions in at least two planning submissions (here in Australia and the planning submission for the existing incinerator in Staffordshire). Given the significance of CO_2 emissions in climate change, this is a serious omission that biases the incinerator proposal towards being more environmentally friendly than it actually is.

> ***Recommendation 1:*** *Care must be taken when considering the claimed emissions of waste incinerators (in particular CO_2). Development proposals by Veolia clearly show emissions levels well below the levels reported in environmental monitoring. Proposals have clearly understated (and effectively lied about) the environmental impact on incinerators. The Inquiry should consider the claimed emissions by proponents in the light of actual performance being far higher.*

3 https://planning.agileapplications.co.uk/staffordshire/application-details/27078

(b) the spread of the emissions predicted and the quality of emissions to be generated

Appendix O (Air quality impact assessment) of the proposed Tarago incinerator clearly states "the introduction of the project will not significantly change air quality impacts" and the results are "not significantly different … for existing operations" (see Figure 3).

> The results obtained from the dispersion modelling show that all predicted concentrations and deposition rates are below the applicable impact assessment criterion at all surrounding sensitive assessment locations. Furthermore, it is noted that the cumulative impact results presented for the three project scenarios are not significantly different from the results presented for existing operations at the Eco Precinct. This indicates the following key points:

Figure 3 *Extract from Appendix O, Air quality impact assessment, Veolia incinerator proposal EIS*

The existing operations for the Woodlawn Bioreactor and Veolia's approach on odour emissions have consistently informed the local residents that modelling used by Veolia is an excellent work of fiction. Condition L6 of EPL 11436 for the Woodlawn Landfill clearly states there are to be no offensive odours from Woodlawn (see Figure 4).

L6 Potentially offensive odour

L6.1 There must be no offensive odour emitted from the premises, in accordance with Section 129 of the Protection of the Environment Operations Act 1997, nor emissions to the atmosphere from the landfill that may adversely affect the health or amenity of the community.

L6.2 No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.

Figure 4 *Extract from EPL 11436 related to odour emissions from existing facilities*

In every submission on the existing facilities, Veolia goes so far as to say they will not exceed the 6 OU (Odour Units) limit. It should be noted however the 6 OU is an ASSUMPTION made by Veolia in their MP10_0012 development Environmental Impact Statement (EIS).

Results

The results of the odour modelling predicted that the 99th percentile 1-second average ground-level odour concentrations at the surrounding sensitive receptor locations ranged from 1.2 OU to 4.1 OU. The Project specific odour performance goal was assumed to be 6 OU and therefore the predicted odour concentrations were below the Project specific odour performance goal.

Figure 5 *Extract from Report 30-2464-R2 "Woodlawn Bioreactor Odour and Dust Impact Assessment Woodlawn Expansion Project" showing this was just an assumption – which they have relied upon for years rather than their environmental license limit.*

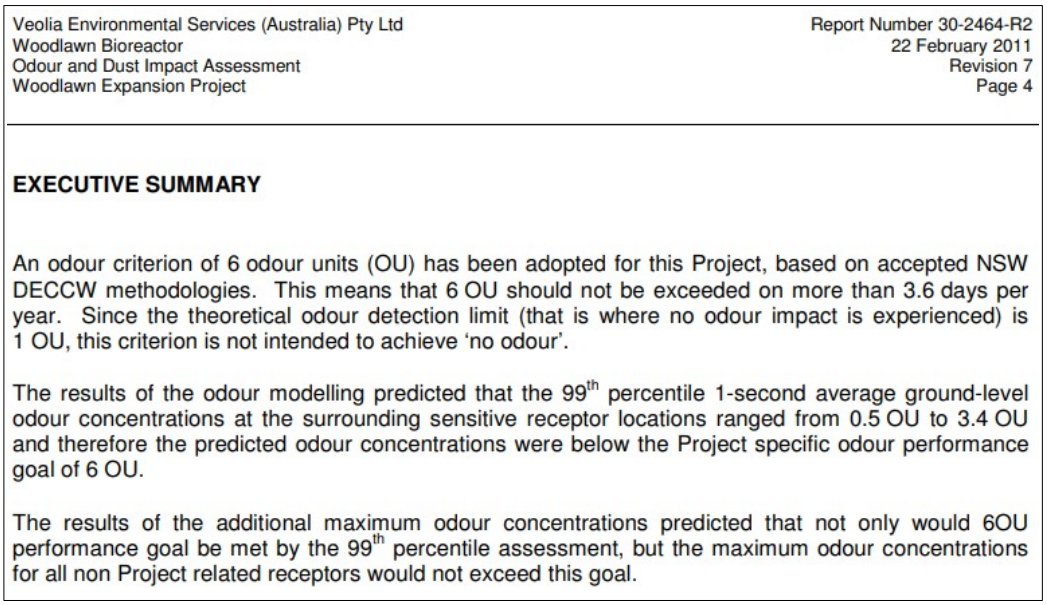
Yet for years there have been emissions from the existing facility and for the last few years there have been hundreds of odour complaints. We live 18kms from the current facilities and we have experienced odour issues here. According to Veolia there are no odour impacts on the local town – let alone 18kms away. Are we supposed to believe the emissions modelling for the proposed incinerator that there will be no impact on us?

Recommendation 2: *Veolia's extant modelling on odour is a demonstrated work of fiction. Claims for an incinerator with predicted emissions should also be considered a similar work of fiction.*

Recommendation 3: *Proposed incinerators must include detailed (and live) online environmental monitoring. They must also provide funding for an independent Center of Excellence to be formed under the CSIRO to conduct short term and longitudinal studies into the environmental impact of incinerators over 50 year periods (3-5 years of baseline activities prior to commencement, 25 years of operations, and 20 years following cessation of operations).*

To further demonstrate the flaws of the modelling and assumptions made by NSW Government departments, we only need take a look at earlier examples from Woodlawn. This informs us that regardless of the submissions in the planning process, and despite reassurances from Government agencies, the local community will be subjected to emissions far higher than those approved.

As a part of Veolia's submission for MP10_0012, an Odour and Dust Impact Assessment was conducted[4]. Figure 6 contains the executive summary from Veolia's report.



Veolia Environmental Services (Australia) Pty Ltd
Woodlawn Bioreactor
Odour and Dust Impact Assessment
Woodlawn Expansion Project

Report Number 30-2464-R2
22 February 2011
Revision 7
Page 4

EXECUTIVE SUMMARY

An odour criterion of 6 odour units (OU) has been adopted for this Project, based on accepted NSW DECCW methodologies. This means that 6 OU should not be exceeded on more than 3.6 days per year. Since the theoretical odour detection limit (that is where no odour impact is experienced) is 1 OU, this criterion is not intended to achieve 'no odour'.

The results of the odour modelling predicted that the 99th percentile 1-second average ground-level odour concentrations at the surrounding sensitive receptor locations ranged from 0.5 OU to 3.4 OU and therefore the predicted odour concentrations were below the Project specific odour performance goal of 6 OU.

The results of the additional maximum odour concentrations predicted that not only would 6OU performance goal be met by the 99th percentile assessment, but the maximum odour concentrations for all non Project related receptors would not exceed this goal.

Figure 6 *Executive summary of odour modelling from 2011*

While Veolia's submission clearly states "the criterion is not intended to achieve 'no odour'", the report also clearly states "the predicted odour concentrations were below the Project specific odour performance goal of 6OU".

The report also contains 18 references to worst case scenario modelling, including those contained in Figure 7 and Figure 8.

4 https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP10_0012%2120190704T041917.974%20GMT

Odour

Additional odour monitoring was undertaken in January 2011 in wet weather conditions, which based on operational and community experience is likely to represent worst case conditions. This new odour emission rate data was used to remodel the potential impacts of the current operations as well as the proposed tonnage increase under worst case conditions.

Figure 7 *From page 3*

A worst case scenario has been modelled, with all liquid storage areas modelled at capacity and with an active waste tipping area of 2 ha with emission rates associated with wet fresh waste, shown in **Appendix E** to be more odorous than dry fresh waste. In reality, leachate (treated and untreated), groundwater and stormwater storage areas are unlikely to be at levels approaching capacity as leachate is used on the waste to encourage degradation of fresh waste. Excessive storage should not be required and an active waste tipping face of the modelled size should not be required in reality.

Based upon the results of this modelling assessment, it is not considered that the proposed Project will lead to an exceedance of the odour performance goal.

Figure 8 *From page 52 under section 7, Conclusions.*

The original approval for DA31-02-99 also concluded the Department was satisfied there would be no significant air quality impacts (see Figure 9).

Conclusion

The Department is satisfied that, with the imposition of the recommended conditions of consent, the proposal will not pose significant air quality impacts.

Figure 9 *Section 9.5 on page 25 for the approvals for DA31-02-99*[5]

The Department of Planning and Environment accepted the original approvals for Veolia and did not expect there would be a significant impact on air quality. Despite the imposition of monitoring requirements, a "substantial buffer zone" and limits imposed on air quality, the Department's conclusion were (and remain) incorrect.

> ***Recommendation 4:*** *The NSW Department of Planning and Environment's previous judgements have been demonstrated to be incorrect (more than twenty years after the approvals have been granted). The Inquiry should take into account modelling by proponents is inaccurate at best. It should also take into account the spread of emissions and and quality of emissions will be far worse than contained in modelling.*

The 2021 "Independent Odour Audit"[6] contained updated modelling of odour emissions (conducted by "The Odour Unit"). An extract of the summary is contained in Figure 10.

9.6 MODELLING STUDY FINDINGS

[removed]

5 https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=DA31-02-99%2120200527T000802.292%20GMT

6 https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2021/08/2021%20Woodlawn%20Eco-Precinct%20Independent%20Odour%20Audit%20%28IOA%29%20%282%29.pdf

> The odour emissions scenario used for the modelling was that observed during the Audit. This scenario represents TOU's best estimate of total odour emissions from normal operational conditions for the Woodlawn Bioreactor during 2020. **This scenario does not consider abnormal conditions or upset events.**
>
> *[removed]*
>
> Notwithstanding the above observations, the modelling has found that the ground level concentration at the nearest sensitive receptor (i.e. the Torokina property dwelling) is predicted to be well below the NSW EPA odour IAC of 6.0 ou (99%, P/M60). **Therefore, it can be concluded that adverse odour impacts are unlikely to be caused by the sampled odour sources evaluated in the Audit.**

Figure 10 *Extract of section 9.6 from the 2021 Independent Odour Audit.*

The modelling conducted in 2021 makes no mention of worst case scenarios, and in fact explicitly excludes the worst case scenario: "This scenario does not consider abnormal conditions or upset events". Furthermore, the updated modelling concludes "that adverse odour impacts are unlikely to be caused by the sampled odour sources" (for the nearest receptor). This is completely contradictory to years of evidence (prior to the 2021 modelling) of odour complaints from Tarago and areas surrounding Woodlawn – in many cases during years of dry / normal conditions.

> ***Recommendation 5:*** *Modelling and simulations used by Veolia are based on "normal operating conditions". The modelling does not take into account climate change. For example the modelling makes no reference to less rainfall, but higher intensity rainfall events. Modelling also needs to take into account above average temperatures. Modelling historically provided by Veolia demonstrates modelling contained in their incinerator submission should be closely scrutinised to ensure it takes into account variations in conditions based on climate change.*

The 2021 modelling does state (section 9.6.1): "However, it does not consider the unquantifiable impact as associated with fugitive gas emission pathways and operational impacts on the Void operations from high rainfall events over the Audit period". The modelling states that Veolia should use complaints as a guide to their compliance in relation to odour emissions.

It is clear from earlier submissions that Veolia's simulations and modelling are inaccurate. Twenty years after the earliest modelling has been conducted, the simulations have been demonstrated to be false time and again. If we extrapolate this to the current submission by Veolia, this raises serious questions – are Veolia's current simulations and modelling for the proposed incinerator just a token analysis? How accurate are their current simulations and modelling? Some of the simulations and modelling previously undertaken were professional and based on a "worst case". Yet they are demonstrably incorrect.

Veolia has made no effort to admit they were incorrect – they have not taken ownership of their past failures. Veolia has lost its social license to operate in the Tarago region.

Exceeding World's Best Air Quality Standards

According to the NSW EPA, new energy from waste incinerators must "meet and exceed world best practice air quality standards"[7] as apparently set out in the NSW Energy from Waste Policy Statement[8]. The Waste Policy Statement however does not actually state this. The policy refers to "Table 1", with many standards not even remotely close to guidelines from the World Health Organisation. This chapter considers the air quality and emissions of the proposed incinerator, particularly in relation to the "world best practice" – rather than the watered down NSW Energy from Waste Policy Statement.

> ***Recommendation 6:*** *The Inquiry should take into consideration the NSW Energy from Waste Policy Statement requirement for worlds best practice is not actually enshrined in legislation. Current legislation does not have any requirement to meet the "worlds best practice" for waste incinerators.*

World Health Organisation – Outdoor Air Quality Standards – September 2021

In September 2021, the World Health Organisation released updated outdoor air quality guidelines[9]. Table 2 contains a list of the new standards (excluding Ozone).

Measure	24 hour mean	Annual mean
Fine Particulate Matter – $PM_{2.5}$	15 µg/m^3	5 µg/m^3
Coarse Particulate Matter – PM_{10}	45 µg/m^3	15 µg/m^3
Nitrogen Dioxide – NO_2	25 µg/m^3	10 µg/m^3
Sulphur Dioxide – SO_2	-	40 µg/m^3

Table 2 *Air Quality limits specified in WHO Guidelines (excluding Ozone)*

Approved Methods for Modelling (2022) and NEPM not up-to-date with WHO Guidelines

Veolia's AQIA uses the 2022 Approved Methods for Modelling from the NSW EPA[10]. While this document is current (i.e. 2022), some content is based on the National Environment Protection (Ambient Air Quality) Measure[11]. The NEPM is specified by the National Environment Protection Council and is legislated under Australian federal law[12].

7 https://www.epa.nsw.gov.au/news/news/2022/new-energy-from-waste-regulation-now-in-place

8 https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/waste/21p2938-energy-from-waste-policy-statement.pdf

9 https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health

10 https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/air/22p3963-approved-methods-for-modelling-and-assessment-of-air-pollutants.pdf?la=en&hash=79991C3AD2F7A1FAEC34EBAA857E7D0CCDDD1B24

11 http://www.nepc.gov.au/nepms/ambient-air-quality

12 https://www.legislation.gov.au/Series/F2007B01142

As can be expected, the law is quite often behind best practice. The NEPM was updated in May 2021 and no longer takes into account the changes in guidelines from the WHO (see earlier in this chapter). Many of the guidelines from WHO have become more stringent, and as such the standards the proposed incinerator must meet are much higher than those contained in the AQIA.

> ***Recommendation 7:*** *Veolia's proposed waste incinerator does not include the "world's best practice". There is no requirement for waste incinerators to actually meet the best practice, and there is no requirement to upgrade facilities when changes to thresholds are made (for example in September 2021). The Inquiry should consider the need for waste incinerators to not only meet world's best practice, but to cease operations when emissions standards are updated and a facility can not meet those standards.*

It should also be noted that Veolia have used the standards set in Table 1 of Schedule 2 for air quality from the NEPM (2021). However according to the NEPM, these standards change for $PM_{2.5}$ as of 2025 – becoming more restrictive.

	$PM_{2.5}$	**$PM_{2.5}$**	**PM_{10}**	**PM_{10}**
Averaging period	24hr	1 year	24hr	1 year
Veolia's values	25	8	50	25
NEPM values (current)	25	8	50	25
NEPM values (from 2025)	20	7	50	25
WHO guidelines (Sept 2021)	15	5	45	15

Table 3 *Veolia's AQIA uses the most lenient values (in this example just for PM2.5 and PM10) (all units in $\mu g/m^3$)*

As can be seen in Table 3, Veolia used values based in the currently legislated NEPM values. These values are already out-of-date given the NEPM clearly states new values from 2025. Veolia's proposed incinerator will not be operational until after 2025, and as such the AQIA is based on incorrect values (not just for $PM_{2.5}$, but for a variety of values – $PM_{2.5}$ is just being used as an example).

NSW EfW Policy Statement Also not up-to-date with WHO Guidelines

As previously highlighted, the NEPM is not up-to-date with the latest WHO Guidelines. The Policy Statement also lumps $PM_{2.5}$ and PM_{10} limits together.

> ***Recommendation 8:*** *The NSW Energy From Waste policy (and relevant legislation) needs to enshrine the requirement for any incinerators to meet the worlds highest quality air and emissions standards. There should also be a requirement for any incinerators to meet all future higher emissions standards as they change over many years. Inability to meet such standards prior to the standards coming into effect should require a waste incinerator to cease operations.*

Background Levels Already (Significantly) Exceed Limits

Veolia point out that the background air quality levels in Canberra correlate strongly with the values from Goulburn (section 6.3 and the AQIA). Given the incinerator will not be operational until after 2025, Veolia should be using the $PM_{2.5}$ limits from the NEPM that are more restrictive at 20 µg/m^3 for 24hr and 7 µg/m^3 for one year averaging periods.

Using these values, the background regional air quality already exceeds the standards on multiple years. If we apply the latest WHO guidelines from September 2021 of 15 µg/m^3 for 24hr and 5 µg/m^3 for one year, the background levels significantly exceed the standards on almost every year for the data Veolia includes in Table 6.1 of the AQIA. These values have been applied to Figure 6.3 from the AQIA (see Figure 11) to demonstrate the difference with Veolia's claims.

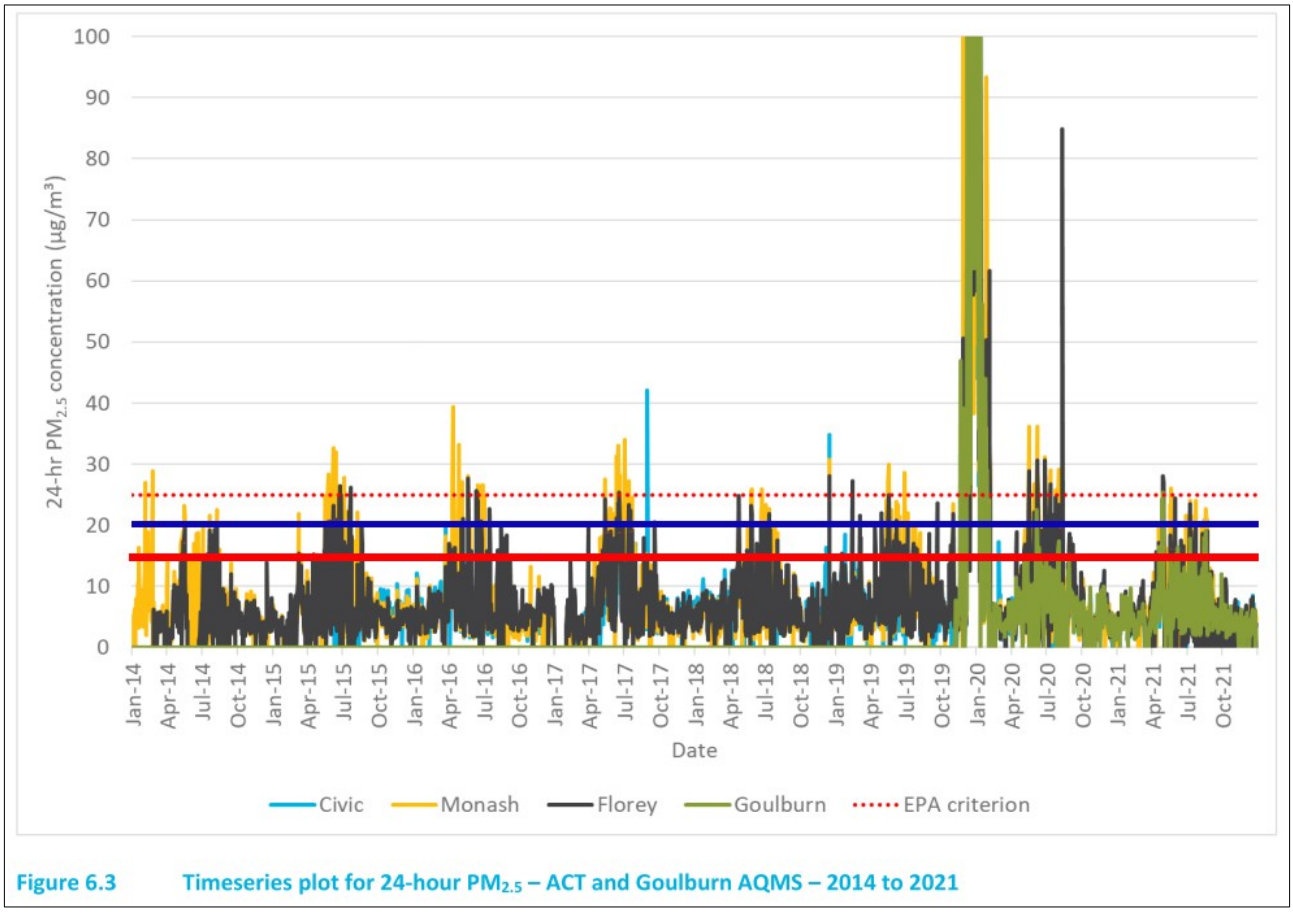


Figure 11 *Figure 6.3 from the AQIA – the solid blue line is based on the NEPM from 2025, and the solid red line is based on the September 2021 WHO guidelines*

As can be seen from the graph – the background levels already exceed the NEPM legislated requirements from 2025 onwards for 24hr $PM_{2.5}$ levels (the solid blue line). The background levels are exceeded even more when you take into account he September 2021 WHO guidelines. The reality is **any extra emissions to the air are a bad thing** (regardless of if they are offset or not).

> ***Recommendation 9:*** *Care must be taken when reviewing data from incinerator proponents. Out-of-date data using older (and less strict)*

emissions limits have been in use by Veolia for their proposed Tarago incinerator. The NSW Inquiry should fact check claims made by proponents.

(d) impacts on human health including on regional town drinking water, rainwater harvesting and soil contamination

(e) the impact on agriculture locally and across the wider region

The science has been debatable with numerous reports for and against incinerators. Any new incinerator should only be permitted with extensive (and independent) research including three years of baselines prior to commencement of operations. While both proponents and those against incinerators both claim opposing views supported by various forms of "evidence", the argument over incinerator safety can only be settled by independent longitudinal studies.

> ***Recommendation 10:*** *All waste incinerators must provide funding to a Cooperative Research Centre (CRC) or Center of Excellence (CoE) to be formed under the direction of the CSIRO. Funding must be provided such that the CRC/CoE can undertake the following activities:*
>
> - *3-5 years of collection of baseline data prior to the commencement of operations;*
> - *Data collection from up to 50kms from the proposed site;*
> - *Collection from (but not limited to) air, surface soil, surface water, subsurface water and tank water;*
> - *Longitudinal studies allowing up to 5 years prior to commencement of operations, 20-25 years of operations and 20-25 years following ceasation of operations; and*
> - *Human health data.*

(g) impacts of waste-dumping over a number of decades in the Tarago region

Woodlawn was originally proposed as an interim landfill capacity for a period of 20 years of operations (see the Wright Review 1999, included with this submission). Table 4 (on the following pages) contains a brief list of what has been proposed originally in DA31-02-99 and then later in MP 10_0012 compared to what has actually happened. These are the bigger impacts of Veolia's operations.

There are other secondary impacts on the local community including:

- Division of the community – some people are employed or contracted by Veolia, and while they might ordinarily complain about the odour, they are likely prevented due to the risk of loosing their employment. Yet the rest of the community has to "tollerate" stench, endless trucks and now water contamination;
- Endless years of complaints that go unheard by the EPA and a "learned helplessness" due to lack of action being taken against Veolia;
- Years of dangerous driving of trucks moving waste and cover material to and from Veolia's facility. This includes many speeding trucks through the local town (while there are other operators in the local area, this has been an ongoing issue for years);
- Tourist traffic avoiding stopping in the town due to the stench – in some cases we have overheard conversations of people passing through who would travel another route rather than deal with the stench;

Document	Statement	Now / Reality
DA31-02-99 pr_woodlawn.pdf[13]	25 million cubic meters of capacity (in 1999)	EPA GIPA 1143 document from Veolia to EPA clearly states over 25 million cubic meters of capacity remain. Veolia claims to have capacity at current rates to reach the year 2055 (50 years after starting the landfill).
	Operational hours from 6:00am to 7:00pm Monday to Saturday	DA31-20-99 modification 2 **increased** the operating hours to 6:00am to 10:00pm, Monday to Saturday.
	20 years duration	EPA GIPA 1143 indicates plans to **accept waste for many more years**.
DA31-02-99	Maximum input rates DECREASING: 400,000tpa for years 0-5 360,000tpa for years 6-10 325,000tpa for years 11-15 290,000tpa for years 16-20	Woodlawn tonnage expansion approval (2012): Putrescible waste from Sydney: 900,000tpa Residual waste from Woodlawn AWT: 100,000tpa EPA GIPA 1143 clearly shows **intent to increase waste volumes well beyond these numbers.**
	Maximum input from surrounding areas: 50,000tpa for years 6-20	
MP 10_0012 Appendix C and F	Bioreactor peak Generation of 24 MW by 2036 (24 x 1MW Jenbacher engines)	Veolia has 7 Jenbacher J320 engines installed producing up to ~7MW of output – plans to build a second hub and add at least two more engines were **abandoned** by Veolia just prior to proposing the waste incinerator. Veolia also clearly state in CLC meeting minutes they had funding approved for the second hub and more engines.
	Four buildings to house six engines each	
EPL?	Zero discharge	In 2024 Veolia was directed to truck leachate offsite due to **dams exceeding freeboard limits**.
?	No pollution to groundwater	EPA has now identified both **pollution of subsurface water and surface water**.

13 https://www.planningportal.nsw.gov.au/major-projects/projects/woodlawn-bioreactor

	No pollution	For a long time residents complained to the NSW EPA about **leaking shipping containers** as they were transported from Crisps Creek to Woodlawn. It took years and evidence from the community before the EPA took any real action to deal with the pollution.
	No pollution	Although the shipping containers have only been detected leaking in the Tarago area, this would also mean the **shipping containers would have been leaking throughout their journey from Sydney to Crisps Creek**. Again, polluting the environment.
	No odour or impact	The local Tarago community and many surrounding areas have been **subjected to odour emission**s from Woodlawn. This is despite an EPL that clearly states there is to be no odour emissions. It has only been through years of concerted reporting by the public before the EPA took any substantive action. Although Veolia claim (once more) the odour issues have been resolved, it will most likely return once again next winter. Tarago can stink so badly that people do not want to stop, and local residents can not enjoy the rural area in which we live.

Table 4 *Some of the impacts on Tarago and surrounding area compared to the original claims / compared to what we have been told.*

What was an interim measure has now morphed into a dependency for Sydney's waste issue. It is interesting to note the Horsley Park landfill (EPL 11584) shutdown (October 2022) due to Veolia using asbestos as cover material – increasing the dependency on Woodlawn. The Horsley Park landfill was permitted to accept up to 430,000 tpa and would have alleviated some of Sydney's capacity shortfall in the shorter term. This is also around the same time Veolia abandoned plans for expanding the Woodlawn Bioreactor and began proposing the incinerator.

> ***Recommendation 11:*** *The NSW Parliamentary Inquiry should investigate possible re-opening landfills that have been closed prematurely (such as Horsely Park). This additional capacity may provide more "breathing room" to allow more suitable decision making processes to take place.*

Demonstrates efforts to recycle have been failing

The continual increase in waste disposal requirements clearly demonstrates the objectives for recycling have been failing for over 25 years. If recycling rates had increased, Woodlawn would now be effectively closed. This shows efforts to date have been unambitious and have left NSW with a pending crisis. Now is the time to take real action rather than kick the waste disposal issue further down the road.

> ***Recommendation 12:*** *The NSW Government can not afford to take the "easy" decision to incinerate waste. This simply delays the problem a few more years and avoids the need for people to take responsibility for the waste they generate. The NSW Parliamentary Inquiry should consider incinerators in the context of "kicking the can down the road" for someone else to deal with.*

"Land and Expand" / Scope Creep

Veolia's historical SSD proposals and currently proposed incinerator demonstrate a classic "land and expand" strategy. This type of strategy has more recently come to light in Federal Government contracts with the approach being used by large consultancies to initially gain contracts, and over time expand the contract / create a "dependence". Features of Veolia's approach include:

- Understating the emissions of facilities during planning processes in order to claim the incinerators are more environmentally friendly (only later reporting much higher emissions, for example CO2);
- Submitting modifications later that expand the increase in waste going to the bioreactor (Woodlawn was supposed to only be an interium measure);
- Submitting planning applications later that must be accepted by planing authorities other wise the existing facilities can not operate (for example the NSW Government had to legislate to override the planning refusal for the Clyde Waste Transfer Terminal, and the current proposed incinerator and refusing to include the planning requirements for the increase in transmission line capacity between Woodlawn and Goulburn);
- Influencing the NSW EPA in order to constrain landfill capacity in order to sustain profits over a longer time period (see NSW EPA GIPA request 1143);

- Influencing the NSW EPA in order to create positions within the EPA that would be support and drive support for incinerators within the EPA;
- Shutting down other landfill (Eastern Creek) in order to create greater dependence on Woodlawn;
- Delay the current Response to Submissions for the proposed Tarago Incinerator – creating an even higher urgency to deal with Sydney's waste (effectively creating a crisis), thus bypassing environmental planning.

Veolia's motives and objective is clear: Secure approval for the incinerator by avoiding and hiding the true cost to the environment and community. At which point landfill capacity for Sydney's waste will be at an even more critical point. The Department of Planning, NSW EPA and NSW Government will be forced to approve the movement of more waste to Woodlawn and the construction of more waste transfer stations. Effectively the planning process and NSW Government become obsolete at the cost of the environment in order to deal with failed decision making.

> ***Recommendation 13:*** *Members of the NSW Parliamentary Inquiry into Waste Incinerators should take into account the purpose of a democracy and their representation of "the people". If the NSW Government is forced to approve waste incinerators due to a lack of due planning over a period of 25 years, then what is the point of the agencies involved in approvals? The current situation over waste incineration is a clear indictment of the current political processes – and is a failure to do the right thing by the people of NSW.*

CONTINUAL ODOUR ISSUES

Veolia has continually breached it's license conditions, such as that of odour emissions. In more recent years this has resulted in hundreds of complaints per year, and days where local Tarago people have felt so sick they could not physically go outside. The EPA even A deployed a small number of sensors to try and detect the odour for a very short time period (six weeks from memory).

It is interesting other places in NSW have experienced odour issues as a result of other sources (i.e. not the Woodlawn Bioreactor). For example Minchenbury in Sydney and Tumit in southern NSW. In these locations the EPA has gone to great lengths to track down the sources and ensure the odour issues are delt with. For example in Minchenbury they installed permanent odour detection sensors.

This raises the question as to why the lack of effort in Tarago? Why is the EPA biased against dealing with Veolia's continual breaches of license conditions??? (It should also be noted there is also lead contamination in the town, which after many years has still not been sorted out).

The fact is the NSW EPA is between a rock and a hard place when it comes to Veolia's Woodlawn operations. They can not afford to shut down Veolia – this would cause a major waste issue in Sydney due to loss of capacity. So they are forced into keeping Veolia operating. Veolia will be fully aware of this and would know they can "get away" with doing the wrong thing. Here are some examples of Veolia's behaviour:

- Veolia installed a third gas flare at the Bioreactor without informing the EPA. It was not until the EPA visited that it was identified;
- Veolia pumped contaminated Leachate from one dam to another, knowing full well they were not allowed to;
- Veolia continually breach the odour conditions on their license and get away with it.

The EPA will continue to turn a "blind eye" to breaches of conditions. In the context of an incinerator, Veolia will be given a "license" they can breach with no real repercussions. Existing licenses and conditions are simply a formality.

> ***Recommendation 14:*** *The NSW parliamentary inqury should consider the position of the EPA in relation to it's independence of decision making. Due to the current waste capacity issue, Veolia can get away with poor behaviour as NSW is dependent on it's waste acceptance capacity. This poor behaviour will continue for any incinerator – placing health and the environment at risk.*

1999 Community Concern Over Water Contamination

The original approvals for DA31-02-99 (the Woodlawn Bioreactor) clearly show community concerns over subsurface and surface water contamination. These risks have now been realised 20 years after operations have commenced. The EPA never actually informed the community about the subsurface contamination (about 2015 from memory) and it was only recently uncovered when reviewing EPA license details.

Community concerns were effectively dismissed by planning authorities. Given the history of the existing Bioreactor and Veolia's operations, it is only a matter of time before risks associated with the incinerator would also be realised. The EPA will "turn a blind eye" because of Sydney's dependence on waste disposal.

It should be noted however the EPA could not turn a blind eye if the incinerator was to be build at say … Eastern Creek.

During previous development approvals, the local community has expressed concern over things such as water contamination. The NSW Government and Veolia were amendment there would never be any issues. The NSW parliamentary inquiry should take into account that reassurances from proponents, NSW Government agencies and politicians need to be backed up by undertakings that can be reinforced – through legislation would be ideal.

Veolia's "Offsets" Through Financial Grants

Veolia claims the impact on the local community is offset by financial grants (through the Veolia Mulwaree Trust). Table 5 contains a summary of the grants provided to date in 2025 – to the immediate Tarago community, to surrounding communities bounded by Goulburn, Bungendore and Braidwood, and granted to areas further afield.

Zone	2025 Amount	Percentage of total
Tarago itself	$34,660	11.5%
Within bounds of Goulburn, Braidwood and Bungendore	$132,079	44.2%
Further afield	$132,295	44.2%

Table 5 *Percentage of Veolia Mulwaree Trust funds actually allocated to Tarago compared to other areas – 2025 figures to date*[14].

(Note: We made a request to the trust for a spreadsheet of the grants made to the community. Their response was they had no such information available. This is concerning considering they would need to keep details of the money for financial judiciary purposes. As a non-profit organisation, it is curious they can not produce details of their finances).

Veolia do provide financial grants through the Veollia Mulwaree Trust. However the reality is the funds are not focused on Tarago. As an example multiple grants have been made to groups in Oberon including the Oberon High School, the Oberon Garden Program, Oberon Showgrounds, Oberon Tarana Heritage Railway. Oberon is well over two hours drive away from Tarago. To get to Oberon you have to drive 30 minutes to Goulburn, and another hour or more through Taralga and over the Abercrombie River. Veolia's activities in Tarago are not even remotely impacting Oberon.

When you look at the Veolia Mulwaree Trust and the donations to "the local community" – many of the grants are not what would be considered "local" to Tarago. Other locations include: Nowra, Balmoral (near Bargo), Jervis Bay, Ulladulla … and this is just from a list of grants issued in 2025. While Tarago does receive some grants (11.5%), by-and-large the majority of the benefit is to other communities where there is limited or no impact on those communities. The idea that the impact on the local community by Veolia's operations are "offset" by the trust donations is another work of fiction.

> ***Recommendation 15:*** *Proponents such as Veolia claim the impact of their activities will be offset in part by community funds. The reality is such funds are distributed to areas that are not impacted in any way. While Tarago residents have to deal with persistent stench, slow moving trucks, damaged roads and contaminated ground and surface water, Veolia is busy paying for improvements in towns many hours drive away. The NSW parliamentary inquiry should consider the impact of offsetting the impact on communities by waste incinerator proposals. There should be tangible impact on the immediately affected community.*

14 https://www.anz.veolia.com/en-au/about-us/corporate-social-responsibility/veolia-mulwaree-trust/veolia-mulwaree-trust-latest-news

(h) the methodology of emission monitoring employed by leading large scale waste-to-energy facilities in Australia and across the world

In the United Kingdom, many facilities use what is referred to as Continuous Environmental Monitoring Systems (CEMS). Modern technology and the Internet allows data to be displayed in real time. There is absolutely no reason why detailed monitoring data cannot be made available to the public in real time.

By comparison Veolia's current Woodlawn Biorector currently provides a variety of data in archaic document formats that are cumbersom and not conducive to long term analysis of trends. The EPA's monitoring job would be better served by electronic data that can easily be downloaded.

> ***Recommendation 16:*** *Any new incinerators must provide detailed data on all emissions monitoring, including offsets claimed (such as energy produced). The data must be provided online in real time. All data must be downloadable in a format that can be easily ingested into other applications for analysis. For example data should be also available in Comma Seperated Values (csv) format.*

There is a lack of longitudinal emissions studies on incinerators. While some research has been conducted in various locations, there is a general lack of in depth and consistent research conducted. Not just on emissions, but on health impacts etc.

> ***Recommendation 17:*** *Monitoring of large scale waste incinerators must include regular any ongoing payments to an independent center of excellence, lead by an independent and trusted organisation such as Australia's CSIRO. The CoE could conduct longitudinal analysis including emissions, health impact, social psychology etc. At least three years of data would need to be collect prior to the commencement of operations of any incinerator to ensure a suitable baseline.*

(i) alternative solutions to reduce and manage residual waste produced by Greater Sydney

Other solutions are available, however rather than highlight these first, we should look at what are the functional requirements for the management of Sydney's waste.

Functional Requirement 1: Resilience to disruption

Solutions to Sydney's waste issue must be resilient to disruption. Relying on a sole solution in one location will invariably lead to failures. Multiple solutions and methods are required to deal with residual waste. Ideally processing higher in the chain is more appropriate. However solutions lower in the chain (such as waste incineration) must not bias the waste processing cycle such that it is a cheaper option compared to all other options. Solutions need to be suitable to be "co-located" with the collection location.

Functional Requirement 2: Tolerance of laziness and Mistakes

Humans are invariably lazy and also make mistakes. A spate of recent fires starting in rubbish collection trucks due to disposal of Lithium batteries is a prime example of this. People mix food and organic waste in with other household rubbish – because sometimes it is "just easier". Any solutions to managing residual waste should cater for this if at all possible.

Functional Requirement 3: Environmentally Friendly

Any solution that belches out pollution is not ideal. The most appropriate solution should be environmentally friendly – and not leave residual toxic waste behind. At a time when we (as Australians) need to be tackling climate change, any new developments or changes in our approaches to things must take pollution and climate change issues as a significant factor.

Functional Requirement 4: Resilience to changes in waste feedstock

Changes in policies and legislation over many years will lead to changes in the waste feedstock. Recent examples of changes include the roll-out of FOGO, bans on single use plastics, and the re-invigoration of bottle and can recycling. There will be more changes in the future. Any disposal capability must be resilient to future changes.

For example, from 1 July 2026 Businesses in NSW will be required to separate food waste from general waste (phased in over three years depending on business size)[15]. Due to the waste crisis, more and more requirements will be put in place for other waste types – removing them from the waste stream. The expectation the waste stream will remain constant for 20-25 years is a false belief.

Functional Requirement 5: Modular, Flexible and Adaptable

As with Requirement 4, there will be significant changes in the waste feedstock as recycling rates increase. Large monolithic solutions that rely on fixed and predictable waste types effectively lock NSW into a long term (30+ years) solution. With the right policy settings, waste streams will look very different in five years from now. Any solution must be flexible and adaptable

15 https://www.epa.nsw.gov.au/Your-environment/Recycling-and-reuse/business-food-waste

to all these changes. Large monolithic solutions take time. Smaller modular solutions can be placed in more suitable locations.

Functional Requirement 6: Politically Palatable

Solutions must be politically palatable – locating solutions in areas where there is less resistance from the population is simply avoiding the problem. If a solution is acceptable in any location, then it is more likely to fit longer term requirements. If a solution is not acceptable in Sydney due to the higher density population, then it should not be acceptable in other locations (just because there is less resistance from the population).

Functional Requirement 7: Change rapidly as technologies evolve

Technologies and material sciences are evolving rapidly. A drive to more environmentally friendly approaches and recycling are taking place every day. Any solution should not lock in a "long term" fixed approach. A locked in long-term solution represents a "fixed" mindset and will make it easier to ignore the need for change.

Assessment of Waste Incinerators

From the functional requirements we can see that legacy and large monolithic approaches are setup to fail. Large scale landfill are one example. Although NSW does not currently have any waste-to-energy facilities, waste incinerators also fall into this category – legacy monolithic solutions. Increasingly the EPA appears dead-set on transporting waste out of the Sydney basin to rural areas – creating an even larger dependency on limited transport infrastructure.

A key consideration is if the solutions are "easy", "efficient" and "effective".

> ***Recommendation 18:*** *Waste incinerators should be assessed against the functional requirements for waste disposal in Sydney – rather than simply trying to assess if something can deal with the waste volumes. This will help identify solutions that are a waste of time or money vs. solutions that provide real benefit.*

Let's take an example: Waste incinerators:

1. Are not resilient to disruption – shutdown of the southern railway line disrupts the service
2. Are not tolerant of lazy humans – the waste has to be pre-sorted to ensure some elements are not incinerated.
3. Are not environmentally friendly (if it was, it would be built in Sydney) – the CO2 emissions are close (if not greater than) those of coal fired power stations.
4. Are not tolerant of changes in waste feedstock – the waste stream it receives today is not indicative of the waste stream in 20 years time.
5. Are not flexible and adaptable – waste incinerators often lock councils in to decade long contracts, a clear indicator they can not change easily.

6. Are not politically palatable – if it was, it would be built in Sydney.
7. Are unable to change rapidly – once built, it will remain in place for 25-30 years.

It is clear that other solutions must be put in place.

> ***Recommendation 19:*** *The NSW parliamentary inquiry should take into account waste solutions that fit within functional requirements for NSW. The current approach of large monolithic solutions (such as waste incinerators) simply lock NSW into the same problem – too much waste is being generated. NSW needs to leapfrog the current concept of waste incineration and place it at the forefront of waste management around the world.*

One Alternative

One solution would be to deploy technology developed by Bioelektra (based in Poland)[16]. There were attempts to do this in Nowra NSW (which was approved by the EPA), however a combination of factors (incompetence, failure to manage the project etc etc) it has been abandoned.

The technology employed by Bioelektra basically sterilizes the waste (to eliminate the odour) and then "chops" the waste into small pieces before sorting. The manufacturer claims to save 96% of waste from landfill. The system is small and modular. It removes the need to pre-sort the waste. It has already been approved by the NSW EPA. The odour issue is removed and there is no generation of hazardous waste or emissions (there are of course emissions from electricity consumption).

When this technology is compared to the functional requirements, it by far meets the requirements and removes the need to incinerate any waste. It also removes the need to transport the waste over large distances – smaller and more modular installations could be installed in multiple locations around the Sydney basin, creating resilience. As an added benefit, recycling industries can be built around the output of this solution.

> ***Recommendation 20:*** *NSW must as a matter of urgency engage BioElektra Poland (not the failed BioElektra Australia which had no relationship with the original company) to deploy the technology in the Sydney basin. NSW EPA and development approval have previously been granted for the deployment in Nowra. This technology offers the ability to bypass waste incineration.*

Other Policy Settings – NSW Waste Levy

Other policy settings must change to support recycling rather than waste disposal. The NSW EPA has stated the waste levy is not payable on waste sent to an incinerator where there is energy generation. This effectively encourages councils and people to send their waste to an incinerator – it is cheaper to do so.

While it is politically unpalatable to do so, applying the waste levy to all waste regardless of treatment method is required. The waste levy must also reflect the crisis that Sydney (and NSW) faces. Changing recycling rates will not simply occur with public messages.

16 https://bioelektra.com/en/

However increasing the waste levy is only reasonable if people have the opportunity to reduce how much they pay for waste collection. As such we need to implement changes to the collection system such that if a person chooses to put their bit out every second time, they can save on their waste fee on council rates. The technology does exist, it is simply a matter of working out how to apply the technology. Thus a family who cuts back on general household waste such that they only put their bin out once a month might save 20% on their waste fees.

> ***Recommendation 21:*** *The NSW Waste Levy must become payable on all waste being sent to landfill or for incineration (regardless of if energy is generated or not). Without a waste levy, it is cheaper and easier to dispose of waste rather than truly recycle materials (or not to generate the waste in the first place).*

> ***Recommendation 22:*** *The EPA and waste disposal companies must come up with a "user pays" method for waste disposal fees. Higher costs for disposal of waste will change behaviour, but only if a carrot is offered – some method for people to reduce their waste fees. The current "everyone in a council area pays the same amount" approach will not modify behaviour.*

(j) any other related matters

The items in this section have been kept short (simply due to time to prepare this submission). Please excuse the brevity of these items:

- A waste incinerator in Tarago does not fix Sydney's waste issue. In order to do that there would have to be a significant increase in waste transported from Sydney to Woodlawn. This would require significant increases in infrastructure to support more trucks, more trains, more waste transfer stations etc. In reality a waste incinerator at Woodlawn does not offer an immediate increase in the disposal of waste from Sydney.
- If modern incinerators are so healthy for humans, there is absolutely NO reason they can not be build in Sydney (other than an arbitrary policy). The fact a policy exists based on the emissions and health impact on an already polluted Sydney basin, tells us the reason the incinerators are being proposed in rural areas is not because there is less risk – it is because there is a lower impact. For example if the risk is 1:10,000 people are affected, more people would be affected in the Sydney basin than in any of the specified precinct. As such the NSW Government, EPA and Department of Planning are effectively accepting less people will be affected – who do we sue first when there are health impacts 20 years down the track?
- Veolia's Tarago proposal is unique in that we have an existing operator in place. We can judge their future behaviour on the basis of their current track record. At what point does a company become a repeat offender and is denied a license? This clearly demonstrates the EPA will turn a blind eye to any future failures of Veolia's operations due to Sydney's dependence on landfill. Veolia have been a repeat offender for many years (not just at the Woodlawn Bioreactor, but there other licenses show many non-compliance issues over many years).
- We have a right to a healthy environment. While NSW has not enshrined this in legislation other states and territories (such as the ACT) are doing this. Many people move to regional areas to enjoy a healthier lifestyle.
- While on balance it seems that one reason is there is less pollution in regional areas, so spreading the pollution over regional areas is better for the overall health. However if we take an example of a fictional pollutant XYZ. If the levels in Sydney are 1000 and an incinerator raises that by 100, this represents a 10% increase. Given such high levels already, the impact on the health of the Sydney population is not significant. However if the levels in a regional area are 100, an increase of 100 units would represent a 100% increase. This would have a significant increase in health issues for the local polulation.
- Waste incinerators do not make economic sense in a broader perspective. The circa 2020 cost of the proposed Tarago incinerator was $600m (this would likely be closer to $800m or more now). The electricity exported is around 25MW. This equates to around $1500 per MWh (or $1.50 per kWh). This also does not include interest on any loans required for such an investment. $600m can buy a lot of wind turbines and solar panels which output far more electricity.
- The electricity produced (25MW) represents a tiny fraction of the electricity for the National Electricity Market on a random mid-winter night (0.115%). To replace a single 700MW coal fired generator (such as Mt Piper), NSW would need to incinerate 28 times as much rubbish. This would require 56 trains transporting the waste, many more trucks to move the waste

and 28 x $600m facilities to burn the waste (at a cost of $16.8b). And this is just to replace one coal fired turbine. The idea that waste incineration is a renewable form of energy is green-washing at best.

- It has become apparent in recent months that the EPA is being influenced by large corporations. NSW EPA GIPA request 1143 clearly shows Veolia is engaged in such behaviour. Recent media reporting also indicates the NSW EPA has also been influenced by large corporations in relation to Lead contamination in Broken Hill. We have continually had to “police” Veolia due to a lack of action and effort by the EPA. The simple fact is the EPA is not resourced and can not demonstrate sufficient independence to monitor a far more complex waste incineration process.
- Veolia is currently delaying the Response to Submissions (RTS) for the proposed Targo incinerator. It has clearly stated this is due to wanting to see the outcomes of policy reviews currently underway within the EPA. Given we know Veolia is influencing EPA documentation and decisions, it is safe to assume Veolia thinks the updated policies will work in their favour. However the longer the delays, the more “desperate” the EPA and NSW Government will become in order to resolve the pending waste crisis. In other words delaying their response is likely to lead to a more favourable decision for Veolia – regardless of the environmental harm a waste incinerator would cause. The planning process seems very biased towards a proponent that can delay the RTS by many years – leaving the local community under a cloud of uncertainty. Hardly fair, and a form of psychological torment.
- There are risks of creating a monopoly on waste management for Sydney. An incinerator in Tarago, combined with plans to increase waste from Sydney to Tarago (EPA GIPA 1143) would allow Veolia to dominate the waste management in Sydney. Waste incineration in Tarago will not end well.
- The NSW Government April 2017 Inquiry into Energy from Waste technology offers insight into many of the issues that will likely be raised in this current inquiry. Over eight years ago the same issues were being raised and discussed. If anything this current inquiry should highlight the complete and utter failure of the NSW Government to take action and reduce the volumes of waste generated. Urgent action to REDUCE waste is required NOW. Waste Incinerators do not address the root cause of the issue – they only allow the NSW Government to further delay dealing with the root cause. Increasing the waste levy dramatically will change recycling rates. But it is politically unpalatable.

Questions For the NSW Parliamentary Inquiry

The following are questions I think the Parliamentary Inquiry could be asking of various parties to help resolve the issues raised in this submission:

Questions for Veolia

Why have you delayed (for three years) the Response to Submissions for the proposed Woodlawn incinerator?

The EIS for the Woodlawn incinerator clearly shows ~146,000 tpa of CO2 emissions. Veolia's proposal to the UK Government clearly shows ~100,000 tpa of CO2 emissions. Yet emissions monitoring and the BAT reference documentation shows much higher CO2 emissions (2.5 to 4 times higher than proposals). Can Veolia explain this discrepancy?

Large portions of the funding in the Veolia Mulwaree Trust is distributed to areas well outside the local community affected by Veolia's Woodlawn operations. What impact does Veolia's operations have on (for example) Oberon NSW?

It is clear from NSW EPA GIPA 1143 that Veolia and the NSW EPA are communicating in relation to expansion of the Woodlawn facilities to accept more waste. Given historically Veolia's proposals have promised one thing and then done something else (such as increasing waste volumes rather than decreasing volumes), how can we believe Veolia's proposals?

Veolia originally promised the Woodlawn Bioreactor would generate 24MW of electricity (4 hubs of 6 turbines each) at the end of 20 years. Veolia currently has only 7 turbines installed (with the last one installed about 7 years ago). Veolia had funding and planned to install two more turbines (according to CLC meeting minutes), but this plan was abandoned right before the waste incinerator was proposed. What percentage of gas is currently being flared (rather than generating electricity)? When will Veolia be installing the remaining promised 17 turbines? Did Veolia falsify claims of how much electricity would be generated in order to get approval for the project? How can the current incinerator proposal be trusted based on Veolia's failure to live up to previous promises?

Questions for the EPA

NSW EPA GIPA 1143 shows Veolia influencing the EPA's processes. Recent media reporting in relation to lead contamination in Broken Hill also indicate the EPA is being influenced by large corporations. How can the EPAs decisions and processes be demonstrated to be independent and in the best interest of the people and environment in NSW?

The EPA has undertake extensive efforts to deal with odour issues in locations other than Tarago (such as Tumit and Minchenbury). Can you please explain why this sort of effort has not taken place in Tarago?

The EPA has set the risk level of the three licenses at Woodlawn (for the Bioreactor, the MBT and the Crisps Creek waste transfer station) at "3" – the highest level of risk. At what point does the EPA consider a company a "repeat offender" in relation to non-compliances and breaches of conditions? Given the history of Veolia at Woodlawn, why would the EPA issue a license for a waste incinerator?

The NSW EPA is clearly in a challenging position: they cannot close down Veolia's operations as there is a dependence on waste disposal capacity. How can the EPA ensure it's independence and enforce licenses when companies such as Veolia have the EPA "under their thumb"?

Why can't we raise the NSW Waste Levy?

Why doesn't the NSW Waste Levy apply to waste incinerators that generate electricity? Surely that would encourage everyone to just burn the waste because it is cheaper?

Questions for the NSW Government and Members of Parliament

What is the point of of being a representative of the people if you do not represent the views of the people?

Why is it successive NSW Governments over 25+ years have failed to deal with NSW's waste issues? The current waste crisis is a demonstrated failure of Government.

Conclusion

There have been almost three decades to deal with the waste crisis in NSW. These years have been squandered by all political parties in NSW. The NSW EPA and Government are between a rock and a hard place. They can not close down Veolia's Woodlawn operations as the landfill is critical in filling insatiable levels of waste being generated in Sydney. This leaves the EPA to "turn a blind eye" to years of failures. It also means Veolia knows it can get away with virtually anything due to the dependency that has been created.

It is clear that large monolithic solutions (such as incinerators) that pollute the environment and endanger human health are not an ideal solution. At a time in human civilisation when we need to be taking serious and tangible action to tackle climate change, are we really going to take the easier path to deal with waste and yet pollute the environment?

Waste incinerators will lock NSW into many more decades of "kicking the can" down the road – and not actually tackling the underlying causes: Too much waste is being generated. Cheap disposal of waste in incinerators does not engender the change required and does not align with any net-zero plans.

There are other alternatives, but the political will-power is lacking. Raising the Waste Levy is unpalatable (particularly in a "cost of living" crisis). Rolling out new technologies is bold and will upset the power imbalance and dependence on existing waste companies.

For years the tabacco industry successfully convinced many that smoking was safe. It was not for decades it became apparent there were significant health impacts. A private waste industry on which the NSW Government is dependent on to deal with a crisis of its own creation can get away with incorrect modelling.

In Tarago we have had a unique opportunity to witness the behaviour of Veolia through their current operations. They have failed to deliver on promises. They have polluted the environment. And they know they can get away with it. Promises by agencies and the NSW Government have zero credibility and zero weight. An incinerator here will lead to more broken promises, more contamination and breaches of license conditions. And Veolia will be given a license by the NSW Government and the EPA to pollute without any due care.

If an incinerator is unsafe for Sydney, then it is unsafe for everyone. Just because the impact on the NSW Government will be lower in a regional area, does not mean it is appropriate to harm the health of any person in regional areas. If (as everyone promises us) these incinerators are very safe – then there is EVERY reason for incinerators to be built in Sydney. Just because an arbitrary policy (with no real justification) says they should be built in "four precincts", does not mean that policy should not be reversed.