

Submission
No 572

**INQUIRY INTO PROPOSED ENERGY FROM WASTE
FACILITIES**

Name: Mr Michael Doran

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Partially
Confidential

Inquiry into proposed energy from waste facilities

Dear members of the Select Committee

My name is Michael Doran. I strongly oppose the Parkes Energy Recovery Energy-from-Waste facility, for the reasons below.

I am a new resident of Parkes, arriving about 10 months ago with my wife for family reasons. I am for development that benefits the people that live here, but I see very little benefit, and much cost to the town in this proposal. I'm addressing points (d) and (j) of the Committee's TOR. Thanks for noting these concerns. There are numerous compelling sources that fuel and reinforce my objections. The list below barely scratches the surface.

Ref #	Title	Authorship	URL
Ref 1	<u>Statement of Reasons Eastern Creek Energy from Waste Facility (2018)</u>	Independent Planning Commission	https://www.ipcn.nsw.gov.au/sites/default/files/pac/projects/2018/04/eastern-creek-energy-from-waste-facility-ssd-6236/determination/statement-of-reasons.pdf
Ref 2	<u>Submission to the NSW Environment Protection Authority Re: Energy from Waste framework - Options Paper Consultation</u>	Dr Amanda Cohn MLC	https://parkescleanfuture.org/__static/jdj5jdewjhzhodjztvnyy96ac5koej2/250516-Final-submission-to-EPA-Energy-from-Waste-review.pdf
Ref 3	<u>Waste Incineration: Policy Position Statement</u>	Public Health Association of Australia	https://www.phaa.net.au/common/Uploaded%20files/SIG%20documents/Ecology%20and%20Environment%20SIG/PPS%202024/0520_-_EE_-_Waste_Incineration_-_2024.pdf
Ref 4	<u>Call for a moratorium on new waste incineration in the EU</u>	Zero Waste Europe	https://ecostandard.org/wp-content/uploads/2025/10/2025-09-30_Letter_Moratorium-new-waste-incineration.pdf
Ref 5	<u>2017 NSW Legislative Council Committee Enquiry, 'Energy from</u>	Statements by witnesses:	https://www.parliament.nsw.gov.au/

	<u>waste' technology (Transcripts)</u>	(a) Jane Bremmer, Secretary, National Toxics Network (b) Antony Lewis, Blacktown and District Environment Group	committees/inquiries/Pages/inquiry-details.aspx?pk=2436#tab-hearingsandtranscripts
Ref 6	<u>Second Reading Speech of Environmental Planning and Assessment Amendment (Prohibition of Waste to Energy Incinerators) Bill 2020</u>	Cate Faehrmann	https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/'HANSARD-1820781676-82414'
Ref 7	<u>Health Effects due to Emissions from Energy from Waste Plant in London</u>	Greater London Authority (Air Quality Consultants Ltd)	https://www.london.gov.uk/sites/default/files/gla_efw_study_final_may2020.pdf
Ref 8	<u>The health impacts of waste incineration: a systematic review</u>	PW Tait et al	https://www.sciencedirect.com/science/article/pii/S132602002300732X
Ref 9	<u>Waste-to-Energy in the ACT Consultation Report</u>	Transport Canberra and City Services	https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/6615/8510/9179/Waste-to-energy_consultation_report_final.pdf
Ref 10	<u>Communication from the Commission to the European Parliament, The Council, the European Economic and Social Committee and the Committee of the regions: The role of waste-to-energy in the circular economy</u>	European Commission	https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017DC0034
Ref	<u>Why solid waste incineration is not the answer to your city's waste</u>	C40 Cities Climate Leadership Group	https://www.c40knowledgehub.org/s/article/Why-solid-waste-incineration-is-not-the-

11	<u>problem</u>		answer-to-your-city-s-waste-problem?language=en_US
Ref 12	<u>‘Europe’s big trash-burning experiment has become a dirty headache’</u>	Politico	https://www.politico.eu/article/europe-experiment-zubieta-waste-electricity-homes/#:~:text=by%20EU%20laws.-,Stranded%20assets,from%20supporting%20the%20technology%20unconditionally.
Ref 13	<u>Economic, Environmental, and Sociopolitical Aspects of Waste Incineration: A Scoping Review</u>	PW Tait et al	https://www.mdpi.com/2071-1050/17/12/5528
Ref 14	<u>Fact Sheet: Waste to Energy: Greenwash at its best</u>	The Greens	https://greens.org.au/sites/default/files/2019-09/Waste%20Incinerators%20Fact%20Sheet.pdf
Ref 15	<u>Submission to the Select Committee on Proposed Energy from Waste Facilities</u>	Queanbeyan-Palerang Regional Council	https://www.parliament.nsw.gov.au/lcdocs/submissions/92158/0046%20Queanbeyan-Palerang%20Regional%20Council%20(QPRC).pdf
Ref 16	<u>ACT Waste-to-Energy Policy 2020-25</u>	Transport Canberra and City Services	https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.act-yoursay.files/3815/8509/9072/TCCS_ACT_Waste_to_Energy_Policy.pdf
Ref 17	<u>How Does Waste Incineration Affect Communities?</u>	Sustainability Directory	https://pollution.sustainability-directory.com/question/how-does-waste-incineration-affect-communities/
Ref 18	<u>Waste incineration and the environment</u>	Nikola Jelinek et al	https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/09/Jelinek_2024_Waste-Incineration.pdf
Ref 19	<u>Objection to Application No SSD-21184278 for the construction and operation of the Woodlawn</u>	Peoples Climate Action Coalition	https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/

(d) Impacts on human health

The Independent Planning Commission (Ref 1) quotes the Department of Planning and Environment (DPE) DA consideration which outlines fundamental issues with Energy-from-Waste incinerators in general:

- The proposed fuel contains a significant portion of potentially hazardous waste streams which may result in harmful compounds, such as dioxins and furans, in the emissions.
- Submissions on the development demonstrate there is significant opposition to the proposal.
- The development is not in the public interest as the public benefit of the proposed development does not outweigh the potential unacceptable impacts the proposed development may have on the surrounding local community now and into the future.
- The impacts to air quality and risk to human health are unknown.

While some of the reasons outlined by the Independent Planning Commission (IPC) for rejecting the Eastern Creek Energy-Waste facility application are unique to that application, much of the reasoning applies equally to this Parkes proposal. One obvious reason the Eastern Creek proposal was blocked and incinerators are now banned in most NSW locations relates to risks in the context of high population density. But as Dr Amanda Cohn (Ref 2) reminds us, the precautionary principle:

must be applied equitably to all residents of NSW, not only in areas of high population density. In addition to the human health impacts of air pollution, rural residents have raised their concerns about impacts on livestock, water, and agricultural land.

The IPC also notes that in the view of DPE, there is a risk that operation of the facility might result in the release of harmful compounds such as dioxins and furans over the life of the project, presenting a potential chronic risk to the health of the local community.

Given that incinerators are responsible for reporting on emissions, continuous emissions monitoring is a must. However Continuous Emissions Monitoring Systems (CEMS) in the Eastern Creek example were not equipped to monitor nitrous oxide, heavy metals, dioxins and furans. Instead these pollutants could only be monitored by means of spot sampling. As there could be no certainty as to the composition of the fuel mix, the IPC had no confidence that the operator could monitor and manage emissions. To quote the report:

The Commission finds that there is insufficient evidence that operational controls and conditions of consent can appropriately manage air quality impacts due to the uncertainty around the project's emissions. This uncertainty persuades the Commission to adopt a precautionary approach to the consideration and determination of the project's air quality impacts.

Despite industry claims that newer technologies can reduce exposure to toxins, the Public Health Association of Australia (Ref 3) considers it premature to draw conclusions about safety as many health effects are the result of cumulative exposure which takes many years to surface – and the new technology will be unproven for decades to come.

Zero Waste Europe (Ref 4) argues that there is growing evidence to link even the newer waste incinerators to serious contamination and potential health harms. Communities near incinerators across Europe are exposed to dioxins, heavy metals, and PFAS. These have been found in soil, food, and even human bodies, and are associated with cancer, immune dysfunction, and developmental disorders.

Representing the National Toxics Network, Jane Bremmer gave the following evidence at the 2017 NSW Legislative Council Committee Enquiry, 'Energy from waste' technology:

The vast majority of the dangerous pollutants are formed when incinerators start up and shutdown, and the dioxins and other pollutants are formed outside of the stack. (Ref 5(a))

The International Stockholm Convention (Annex C) identifies that incinerators are prime generators of persistent organic pollutants, which contradicts the claim that incinerators can be operated safely. Bremmer says that unlike coal and gas, composite plastics are not a homogenous fuel source - it is impossible to predict the toxicity of plastics and:

Any level of persistent organic pollutant is a risk to our global environment and our global health because these are pollutants that are so dangerous, they travel vast distances intact, they accumulate in the bodies of people and animals and are concentrating in the polar icecaps.

In her second reading speech of the *Environmental Planning and Assessment Amendment (Prohibition of Waste to Energy Incinerators) Bill 2020* Cate Faehrmann (Ref 6) quotes the Greater London Authority report *Health Effects due to Emissions from Energy from Waste Plant in London* (Ref 7), which found that waste to energy incinerators cause the deaths of 15 Londoners per year:

and that 70 National Health Service doctors have called for new development plans to have these incinerators scrapped. That is because incinerators cause a litany of health issues, including respiratory, cardiovascular, developmental, reproductive and hormonal, and immune system problems, including cancer.

While sources such as *The health impacts of waste incineration: a systematic review* (Ref 8) acknowledge that more modern facilities like the 'state of the art' facility proposed for

Particulates are an improvement on older incinerators, they do not eliminate the risk and their effectiveness depends on regular, expensive servicing. Just as there is a zero tolerance for passive smoking, there should also be no tolerance for even a small amount of these substances:

Carbon Monoxide	Lead	Polychlorinated dibenzo-p-dioxins
Nitrogen Dioxide	Mercury	Polychlorinated dibenzofurans
Sulfur Dioxide	Cadmium	Polychlorinated biphenyls (PCBs)
Particulate matter, such as PM10 and PM2.5	Aldrin	Hexachlorobenzene (HCB)
	Chlordane	
	Dichlorodiphenyltrichloroethane (DDT)	
	Dieldrin	
	Endrin	
	Heptachlor	
	Mirex	
	Toxaphene	

Waste-to-Energy in the ACT Consultation Report (Ref 9) states that these facilities, if they are allowed to operate in a jurisdiction, should be a *significant* distance from the nearest residential building or community use.

In a recent Four Corners episode, 'Generation Cancer' we heard about the unprecedented levels of cancer in younger Australians. In the past 25 years, Australians in the 30-39 year age group have experienced astronomical increases in the rates of cancer. Rates for all cancers have increased in that age group. There has been a 500% increase in the rate of prostate cancer, and 200% increase in pancreatic cancer, for example. A number of causes are contemplated. Dr Christos Symeonides explained that more than 16,000 chemicals are found in the composition of plastics. Of these, only a minority have been evaluated in terms of harm, but 75% of those studied are confirmed as being harmful to human biology. Symeonides makes the point that we have to assume that a large majority of plastics chemicals are harmful.

Surely these sobering cancer statistics and the known hazards of these plastics chemicals add weight to health arguments against waste incineration. Let's not multiply the exposure, risks and dangers of these chemicals. Let's not **burn** plastic!

j) Other related matters

Against trend

Unfortunately, here in Australia we are introducing waste incinerators as a solution, just as other jurisdictions around the world are moving away from them. The European Commission Communication: *The role of waste-to-energy in the circular economy* (Ref 10) has communicated that its member countries should be phasing out support schemes for waste incineration and introducing a moratorium on new facilities.

In cities around the world there is growing public opposition to incineration, and it is increasingly being understood as just as unsuitable a solution as landfilling. Investments in incineration infrastructure are increasingly at risk of becoming 'stranded assets' as successful waste reduction strategies take hold and opposition to incineration grows (Ref 11).

Making rubbish worse

Waste does not magically vanish when it passes through the furnace. Every molecule continues to exist in some form; on site, or wherever they are transferred, stored or escape to. Antony Lewis (Blacktown and District Environment Group) nails it when he says:

The project wishes to take inert materials and to make them toxic while producing electricity (Ref 5 (b)).

The reduction in waste volume is matched by an intensification of toxicity,.The fly ash and bottom ash still require disposal. In fact in the Parkes scenario, there will be a need to dispose of at least 120,000 tonnes of bottom ash year on year. I understand there are strict encapsulation requirements and few waste facilities that are permitted or equipped to deal with this classification of hazardous waste. Will it not have to be shipped back to Sydney?

Bad economics

While Australia is rushing to invest in waste-to-energy plants, Europeans are backing away. According to a Politico article (Ref 12), Denmark has an too much waste to energy capacity and is facing the prospect of having to cover the costs of redundant incinerators.

At best, critics say, waste-to-energy plants risk becoming unpopular relics of a misguided waste policy. At worst the existing debt-funded plants could become "stranded assets" that struggle to find enough trash to burn to ensure they remain commercially viable.

The *Waste-to-Energy in the ACT Consultation Report* contains a prediction of:

ever diminishing economic and environmental benefits of WtE-I as the electricity grid becomes more renewable and as recycling becomes the predominant waste management strategy.

In the case of Parkes there's also the cost of transport the waste – a round trip of 1100km.

Councils across Sydney are in the process of introducing a FOGO service – if not by now, they will be required by the NSW government to have introduced FOGO to their LGA by 2030. This will massively reduce the volumes that are now dumped in landfill and the associated climate impacts. One of the strongest arguments for incineration of waste is the pressure on available landfill capacity, and the climate impact of organics that makes up such a large proportion of all landfill waste. Soon there will be less waste, and less impact, and therefore even fewer advantages to incineration. As Bremmer points out:

It makes no sense to spend so much money on the smallest fraction of our waste stream. When we apply the waste hierarchy, residual waste is an ever-shrinking waste stream. Why would anyone want to spend billions of dollars on the smallest, ever-shrinking fraction of the waste stream?

Even now in Europe, incinerators actually *generate* the need for landfill. According to Zero Waste Europe, up to 16 million tonnes of incineration ash is landfilled each year.

Perverse incentive

Burning rubbish is not a premium approach to energy generation. The net energy gain of burning mixed waste is low or non-existent, making incineration one of the least efficient ways to produce energy. It costs more to recover energy from waste than most existing energy sources per same unit of energy - nearly 4x more than solar power and onshore wind energy, and 2x more than fossil gas. (Ref 11)

Neither are incinerators built as a stop gap measure. If the NSW government permits incinerators like the one proposed in Parkes to be built, NSW will be committed to making the investment work. This commitment conflicts with the NSW EPA Waste Hierarchy, because recycling is put into competition with the objective of feeding the incinerator – year in and year out for decades to come. This is the point made in *Economic, Environmental, and Sociopolitical Aspects of Waste Incineration: A Scoping Review* (Ref 13): given that incinerators requires continual feedstock to continue operating, economic imperatives may incentivise waste generation and disincentivise recycling.

The feasibility of incinerators is strongly contingent on the actual composition of the waste stream. Plastics are the most calorie dense and therefore the most valuable item in the mix. This need for a relatively suitable fuel composition is a perverse incentive against recycling. See The Greens Factsheet, *Waste to Energy: Greenwash at its best* (Ref 14) for more on this.

Faehrmann reinforces this point.

The business case for incinerators means any that are approved ... will typically take between 25 and 30 years to become financially viable. Over that time operators will look to secure a steady supply of waste to protect their bottom line.

The *Waste-to-Energy in the ACT Consultation Report* also warns against governments becoming locked into expensive long term contracts with waste-to-energy firms, which commits them to supplying a set volume and composition of waste, rather than working to reduce or repurpose it. Investing in incineration infrastructure or committing to a feedstock contract can create a “lock-in” effect, disincentivizing greater efforts towards waste reduction and recycling.

Socio economic impacts

In their submission for this inquiry (Ref 15), Queanbeyan-Palerang Regional Council predicted that the development of an incinerator in regional NSW would set a precedent for the export of metropolitan waste to rural areas, with heavy impacts on those communities.

Regional NSW should not be the default location for facilities that metropolitan areas reject.

The ACT has banned waste to energy incinerators. In the *ACT Waste-to-Energy Policy 2020-2025* (Ref 16) the reasons for the ban include the Precautionary Principle: that a lack of complete certainty of a negative outcome does not justify proceeding with actions that plausibly bring about that outcome. The Inter-generational Equity Principle also drives the ban: decisions made now by this generation should not jeopardise the health of future generations or damage the environment they inherit.

Waste incineration plants also damage the social fabric and economic landscape of communities. Regardless of actual harms, perception and anticipation of harm is its own powerful detriment. For example, communities in the vicinity of incinerators are observed to experience a decreased quality of life, with psychological impacts as well as property devaluation and other compounding issues. (Ref 17).

Poor compliance

Cate Faehrmann cites European modern plants in the UK, Scotland and Germany:

that have breached emissions rules on multiple occasions and exceeded permissible limits of dioxins—in one case polluting the local environment with five times the legal limit of mercury and in another causing a major explosion.

Jelinek et al (Ref 18) provides detailed examples of multiple such failures, including a state of the art facility in Harlingen in The Netherlands. Semicontinuous measurements at the incineration plant in Harlingen revealed that actual dioxin emissions were higher than

permitted by authorities, evidenced by long-term monitoring. Dioxins from the plant were found in both the eggs and grass.

It is fair to compare European examples with the scenario proposed in Parkes. How can the proponents claim that they will out-perform their European counterparts? Why should Parkes have confidence in their assurances?

My household is the _____ to the Parkes Sewage Treatment works. Apart from being an eyesore, increasingly we are experiencing an odour from the plant. This is not meant to be the case and represents a failure of the operator.

There have been problems since construction began. At the time, the specialist inspector informed my father-in-law that there were numerous major issues that needed rectification before commissioning and being allowed to commence operating. The operator assured the town that there would be no odour, but are not living up to their assurances. They are not responsive to complaints, and/or do not have the ability to deal with their issues. They have fences that have fallen in, and despite being alerted numerous occasions, they or Council do not respond to repair them. At times, water from the plant escapes into a buffer paddock, apparently without their knowledge.

This experience does not fill me with confidence that other operators, even international players like Parkes Energy Recovery have the capability to fully meet their obligations. An odour from a sewage plant is inconvenient and unpleasant, but is not a major environmental or health catastrophe. Can the proponent of the Energy-from-Waste facility do better? Can they operate to the promised standard perfectly, day-in-day out for the entire 40 year lifespan of the plant?

And when they fall short, the fall-out IS an irretrievable major impact on the environment and the health of Parkes residents. The EPA cannot reverse the issue. Fining the operator is no help to us. I don't accept assurances of the proponents that they will comply with EPA standards.

Climate impacts

We are told that incinerators are far preferable to landfill in terms of emissions. This is disputed: According to the Peoples Climate Action Coalition (Ref 19):

- Incinerators emit more CO₂ per megawatt-hour than coal-fired, natural-gas fired, or oil-fired power plants.
- Approximately one tonne of CO₂ is emitted for every tonne of waste incinerated.
- Nearly half those emissions are derived from fossil sources such as plastic.

Zero Waste Europe reinforces these claims:

Waste incineration is increasingly recognised as a climate liability.

They say that the carbon intensity of energy generated by incineration is higher than that of many conventional energy sources, due to the high fossil content of plastic within the waste sent to incinerators. Greenhouse gas emissions from incineration conflicts with the goal of climate neutrality.

Building new incineration facilities now would entrench high-emission infrastructure for decades.

Morale killer

During the public consultations held during the 2017 NSW Legislative Council Committee Enquiry, 'Energy from waste' technology, Penny Sharpe made the very obvious point that the proponents need to make every effort to be good neighbours. As a new resident in Parkes, I can testify to the hospitality of this community. But every neighbourhood has its limits and most locals are not up for this kind of neighbour. We do not welcome the trash of another place. Becoming known as 'the town where rubbish goes to burn' is not a good look.

If the government approves this unwanted incinerator, the town will take a hit in morale and prosperity. Some of our neighbours will leave, and sightseers and people who might otherwise have settled here will look elsewhere, and so begins a slow decline.

Michael Doran
24 October 2025