

**Submission
No 580**

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

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NSW Parliamentary Inquiry into Proposed Energy from Waste Facilities

I am opposed to Veolia's proposed waste-to-energy incinerator at Woodlawn and other locations in NSW. The most significant factors in my opinion are:

1. **“Forever chemicals” are not clearly or thoroughly addressed in the EIS documentation.** Specific per-/polyfluoroalkyl substances (PFAS) are not modelled explicitly in the EIS emissions, air quality, or residue assessments. Veolia appears to consider them only a potential risk rather than specifically modelling their impact.
2. **Emission modelling is based in part on UK facilities.** This may differ significantly from the actual parameters invoked for the proposed Veolia facility.
3. **Ongoing monitoring is not adequately discussed.** There is no mention of how long-term monitoring of PFAS will be achieved; monitoring is only mentioned for those substances already identified.
4. **Long term exposure hazards are not satisfactorily considered.** If PFAS compounds persist longer than the timeframe considered or exposure is not adequately modelled, there may be long-term effects not even conceived.
5. **Opposition in countries with established waste incinerators.** There is significant opposition to waste incinerators in Europe. The resistance arises from a number of environmental, health, economic, and policy-related issues:
 - modern incinerators emit pollutants (particulates, heavy metals, dioxins/furans, etc.). Key concerns include emissions during start-up/shut-down (when combustion is less stable), poor measurement, and lack of continuous monitoring in some cases.
 - emissions are measured only in “stable operations,” not during start-ups, shutdowns, or malfunctions, which are often times of highest pollutant release. Many pollutants (especially newer/unregulated ones) are not subject to strict and continuous monitoring.
 - communities near incinerators express concern about air quality, odour, increased traffic (waste transport), ash disposal, etc. and the lack of transparency or insufficient inclusion of local concerns.
 - biomonitoring around several waste-to-energy or waste (co)incinerators in Europe found elevated levels of dioxins, PFAS and heavy metals in eggs, vegetation, moss, pine needles, roof dust, etc.
 - studies show PFAS do bioaccumulate in produce and soil, depending on soil contamination levels, plant type, soil chemistry etc.
 - work by the US EPA on measuring PFAS emissions from incineration suggests low PFAS emissions under certain operating conditions, but incomplete destruction, and the possibility that residues or emissions may still contribute to environmental contamination.

Summary: Given the large numbers of ‘unknowns’ applicable to this technology and the possible long term effects on human health, it would seem obvious that a Pre-Cautious Approach should be taken before approving or implementing the Veolia proposal. I agree with many community voices that oppose the approval of Waste to Energy facilities in NSW.

25 October 2025

Jeff Randell