

**Submission
No 561**

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

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Submission to the NSW Legislative Council inquiry into waste-to-energy (incineration) and to the NSW EPA Energy-from-Waste framework review

Introduction and interest:

I am a NSW resident and ratepayer. I make this submission in my personal capacity. My interest is the protection of public health, local amenity, and the long-term success of NSW's circular-economy objectives. This submission addresses current and foreshadowed proposals for municipal solid-waste incinerators within NSW.

Position:

I do not support approval of new municipal solid-waste incinerators in NSW. Incineration risks entrenching high-emissions disposal, exposes host communities to residual pollution and heavy vehicle impacts, and diverts scarce capital away from higher-order waste avoidance, repair, reuse, source-separation and recycling.

Key concerns:

Public health and monitoring:

Residual emissions of ultrafine particles and persistent pollutants remain a concern given variable waste streams. Any regulatory settings must, at minimum, require independent continuous emissions monitoring, public real-time reporting, and automatic enforcement triggers. In the absence of these safeguards being demonstrably effective, proposals should not proceed.

Climate alignment and lock-in risks:

Where plastics and other fossil-derived materials comprise a material share of feedstock, incineration can be emissions-intensive. Long-tenor put-or-pay contracts risk suppressing recycling and design-out initiatives by guaranteeing mixed-waste throughput for decades.

Community impacts and freight burden:

Shifting Sydney's disposal burden to regional precincts transfers heavy vehicle movements, odour risk, and cumulative air-shed loads to communities with limited capacity to absorb them. Social licence is unlikely without clear community-led consent and benefit-sharing.

Alternatives that solve the same problem:

Fast-tracking organics diversion (FOGO), repair/reuse networks, advanced sorting, product stewardship, and landfill-gas capture can relieve landfill pressure without locking NSW into combustion of recyclable materials.

Recommendations:

1. Maintain and strengthen the current prohibition on large-scale EfW incineration in the Sydney Basin and avoid displacing metropolitan waste harms to regional communities.
2. Do not approve any plant unless a waste-hierarchy test is satisfied and independently audited: avoidance, repair/reuse, source separation and recycling must be maximised first.
3. Require cradle-to-grave greenhouse accounting, including transport and ash management, aligned with NSW emissions targets.
4. Impose best-available control technology with continuous monitoring for PM1/PM2.5, NO_x, SO₂, metals, dioxins/furans; mandate public dashboards and shutdown/penalty triggers.
5. Prohibit minimum-tonnage and calorific-value contract clauses that undermine recycling; include five-year review points to ratchet down combustibles as recovery improves.

6. Commission a funded circular-infrastructure program that prioritises organics, advanced sorting, reuse/repair hubs and stewardship over incineration.

Conclusion

NSW should focus on measures that reduce waste generation and keep materials in productive circulation. Incineration should not be approved where it compromises health protections, climate targets, or circular-economy outcomes. I ask the Committee and EPA to reject new municipal solid-waste incinerators and codify a precautionary framework that prioritises avoidance, repair, reuse, high-quality recycling, organics treatment, and safer interim measures.