

**Submission  
No 597**

## **INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES**

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# Submission to the NSW Parliamentary Inquiry into Energy from Waste

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## **Introduction**

My wife and I own Three Gullies Farm, a small regenerative agriculture property in the Southern Tablelands of New South Wales. My family has lived in this region for many years, and our livelihood depends on maintaining a healthy local environment. I am opposed to Waste-to-Energy projects in NSW, including the proposed Veolia Energy-from-Waste (EfW) Incinerator at Tarago.

We rely on clean air, uncontaminated water, and healthy soil, not just for our personal well-being but also to support our farming operations. Our experiences show the importance of scrutiny and transparency when making decisions about developments that could affect rural communities and ecosystems.

On our farm, we keep a herd of Dexter cattle, raised for local meat supply and land regeneration. We focus on practices that improve soil health, water retention, and biodiversity. Three Gullies Farm is located within the Tarago–Mount Fairy catchment, about 12 kilometres southwest of the proposed Veolia Tarago EfW incinerator site.

Scientific and public health research worldwide shows that there are no safe levels of exposure to emissions from waste incinerators. The proposed Veolia Tarago EfW facility raises serious concerns for our community, particularly regarding environmental health and future land use. As a neighbour to the proposed site, I am especially aware of the risks posed by persistent pollutants generated by such operations. The farm's proximity means that any emissions or accidental releases would directly impact our land, livestock, and family.

Prevailing winds and water flows in the area could transport hazardous emissions and leachate from the facility across our property. The risk of dioxins, heavy metals, and delicate particulate matter contaminating our soils, water sources, and paddocks poses a direct threat to livestock health and food safety. As a producer committed to regenerative agriculture, exposure to these dangers jeopardises the resilience and sustainability of local farms. Community concerns are heightened by the lack of independent, long-term environmental monitoring, which makes it challenging to trust assurances from project proponents or regulators.

Our dedication to regenerative agriculture and local food production depends on maintaining an environment free from persistent pollutants. Any degradation caused by

industrial emissions would not only threaten our livelihood but also compromise efforts to foster sustainable rural economies and secure regional food supplies.

This submission seeks to highlight these risks, state my opposition to Veolia's proposed waste incineration at Tarago, and advocate for comprehensive safeguards that protect rural families and future generations.

### **Scientific Evidence of Health and Environmental Risks**

Peer-reviewed studies from the United Kingdom, France, and Italy document increased rates of cancer, respiratory and developmental illnesses, and dioxin contamination in soil and food chains within a 15-kilometre radius of incinerators, even those meeting EU 'best available' standards. Any evaluation of the proposed facility must account for long-term and cumulative environmental risks, rather than focusing solely on initial compliance or short-term mitigation. Transparent, independent oversight and genuine consultation with affected communities are essential to ensure the voices and concerns of rural landholders are acknowledged. Strong protection must be established before any project's approval, prioritising the health of people, animals, and ecosystems above industrial interests.

Research published in the British Medical Journal, Environmental Health, and Occupational and Environmental Medicine highlights increased infant mortality, congenital disabilities, soft-tissue sarcomas, and non-Hodgkin lymphoma near incinerators. These pollutants persist for decades, causing intergenerational harm through reproductive, developmental, and epigenetic pathways. The Public Health Association of Australia (2023) warns that such exposures breach principles of social and environmental justice, especially for rural and Indigenous communities. For food producers like my wife and me, contamination risks challenge our fundamental responsibility to protect the health of the land, our community, and future generations.

### **The Influence of Industry Greenwashing on Policy**

Community trust in government decision-making has been damaged by the degree to which industry narratives, particularly those promoted by multinational waste companies, have shaped the public conversation. The NSW Government's own factsheet claims that incinerators are 'no more polluting than a leaf blower.' This comparison trivialises complex chemical pollution and undermines public confidence in evidence-based regulation. The reality is that EfW proponents have used selective data, misleading carbon accounting, and inflated recycling claims to portray incineration as sustainable. This has delayed genuine investment in waste reduction and circular-economy innovation. Independent oversight is urgently needed to separate industry marketing from science-based environmental policy.

### **Parallel Contamination Histories: Lead and PFAS in Australia**

Australia's history of contamination shows that once pollutants enter soil and water, the effects are essentially permanent. In Broken Hill, New South Wales, decades of mining and smelting left dangerous levels of lead in dust and soil, impacting generations of children.

Recent national studies find that one in five Australian vegetable gardens now produce food with unsafe levels of lead.

Australia's history with lead and PFAS contamination clearly demonstrates the long-lasting, damaging effects of persistent pollutants on rural communities. Legacy pollution from lead mining in Broken Hill and widespread PFAS releases from firefighting foams at Defence bases have caused decades of environmental and health issues, including falling property values and expensive cleanup efforts. These incidents highlight the difficulties in holding polluters accountable and the shortcomings of current compensation schemes, leaving affected families to cope with the consequences with limited support. Such examples serve as urgent warnings to decision-makers considering new industrial projects in sensitive farming regions. Proactive, science-based safeguards and strong legal protections are vital to avoiding repeating past mistakes and to protecting the safety and resilience of rural communities for generations.

Similarly, PFAS contamination from the Department of Defence has required over \$700 million in remediation and compensation, yet communities remain unable to use their land and water safely. These examples demonstrate that contamination causes lasting harm across generations. Like lead and PFAS, dioxins and heavy metals from incinerators persist in the environment, bioaccumulate in food chains, and can affect children, grandchildren, and even unborn generations.

### **Compensation and Liability: Who Pays if Things Go Wrong?**

If the proposed EfW facility goes ahead, enforceable compensation and liability mechanisms must be in place before it becomes operational. No community should be asked to shoulder the long-term health risks linked to another's waste. Persistent pollutants, including dioxins, heavy metals, PFAS, and ultrafine particulates, build up in soil, water, and human tissues, crossing the placenta and affecting unborn children. Studies from the UK, France, and Italy connect increased congenital disabilities and cancer rates to proximity to incinerators. Australia's experiences with PFAS and lead contamination demonstrate that harm can persist for generations, with children and grandchildren ultimately bearing the burdens.

It is critical to establish precise, enforceable accountability mechanisms before the facility's operation. History shows that without upfront legal and financial safeguards, those most affected by contamination are often left to bear the costs, while corporations and operators avoid full responsibility.

Given the persistent nature of these contaminants and the serious consequences for rural communities, there is an urgent need for precautionary action based on scientific evidence and genuine community involvement. Adequate safeguards must not only address immediate risks but also establish long-term solutions that ensure safe land use, clean water, and uncontaminated food production for many years. Decision-makers must prioritise strong environmental protection and transparent accountability in all aspects of project assessment and oversight.

Given these realities, a proactive approach is not only prudent but necessary. Preventative measures, including regular environmental monitoring, clear lines of accountability, and legally binding agreements, must be implemented before any facility is approved. Such measures will not only deter negligent practices but also reassure rural communities that their health, land, and livelihoods are being prioritised over short-term industrial gains.

Rural families whose livelihoods depend on the land should not have to endure lengthy legal battles or face economic hardship caused by pollution. Strong legal frameworks are necessary to ensure affected people receive quick compensation and essential healthcare, safeguarding both current and future generations.

The cumulative lessons from these contamination events underscore the necessity for rigorous pre-operational safeguards and transparent decision-making processes. Policymakers must engage with scientific experts, affected landholders, and local communities to co-design monitoring and accountability frameworks that are adaptive and resilient over time. This collaborative approach ensures not only that environmental and health standards are upheld, but also that trust is built between industrial operators and those whose livelihoods depend on safe land and water.

To further protect rural communities, regulatory processes must include strict compliance audits and transparent public reporting of emissions data. Regular, independent assessments should be mandated to track pollutant levels in air, water, and soil, ensuring early detection of contamination and swift intervention. In addition, affected landholders must have direct access to legal recourse and support services, enabling them to address health or economic harm without undue delay or hardship.

The European Commission's Polluter Pays Principle requires those responsible for environmental damage to cover the full costs of prevention, control, and cleanup, including impacts on human health and the economy. The Corby Toxic Waste Case in the UK and Australia's Department of Defence PFAS compensation scheme are examples where liability and compensation have been addressed, though often after significant harm occurred. Without legally mandated compensation systems, rural families and future generations will be left with the financial and health burdens of contamination.

Therefore, any approval of the Tarago or Parkes EfW facilities should be contingent upon a Compensation and Liability Framework that:

- Implements the Polluter Pays Principle
- Establish a compensation and healthcare fund for affected landholders and families
- Mandates community-scientific monitoring
- Guarantees lifetime healthcare access for those impacted by confirmed contamination or exposure events

Contamination of air and soil affects not only crops and livestock, but also the health and heritage of our children, who suffer the long-term consequences. Proceeding without these safeguards would breach our responsibility to future generations.

### **Performance of the Proposed Technology**

The technology proposed for Tarago and Parkes mass-burn grate combustion is not comparable to the closed-loop, high-efficiency systems operating in leading international examples. In nations such as Sweden and Denmark, energy-recovery facilities are tightly integrated with district heating, waste minimisation, and advanced emissions management infrastructure. By contrast, Veolia's proposal situates a large-scale incinerator in a rural setting without such integration or energy reuse. The proposal, therefore, does not meet 'state-of-the-art' standards and has no operating equivalent on Australia's Eastern Seaboard. This raises serious concerns regarding both performance and oversight.

### **Emissions Spread and Quality**

The Tarago site is exposed to prevailing westerly and north-westerly winds, which would carry emissions directly over agricultural land and rural homes. These emissions include ultrafine particles (PM2.5 and PM0.1), dioxins, furans, and heavy metals, which are known to disperse over large distances and deposit on soil, vegetation, and water surfaces. The Jelinek et al. (2024) report, 'Waste Incineration and the Environment,' confirms that incinerators are responsible for nearly one-fifth of all dioxin emissions in the EU and that these pollutants cause cancer, immune system damage, and reproductive and developmental disorders. Even 'best available' technologies release hazardous pollutants, and short-term monitoring underestimates actual emission levels. For farms like mine, this creates unacceptable risks to livestock health, pasture quality, and long-term soil fertility.

### **Human Health Impacts**

Peer-reviewed public health reviews, including both reports from the Public Health Association of Australia (PHAA), demonstrate clear evidence of health harm near waste-incineration facilities. The most recent PHAA review concludes that future WfE projects are unjustifiable due to their health, environmental, and social justice impacts. International evidence also shows increased respiratory illness, cancers, and congenital anomalies within 10 -15 km of incinerators. It is neither ethical nor prudent for NSW to approve such a facility without robust, independent epidemiological monitoring over time.

### **Water, Rainwater, and Soil Risks**

The Tarago facility sits in the upper catchment of the Shoalhaven–Mulwaree system, from which downstream communities draw water. Contamination risks include run-off and leachate entering surface and groundwater, airborne deposition contaminating rainwater tanks, and soil contamination from heavy metals and persistent organic pollutants. Once introduced, these pollutants cannot be removed.

## **Impact on Agriculture and Regional Economies**

Regional agriculture relies on consumer trust in the safety and integrity of local produce. Even the perception of contamination could devastate local farm businesses, markets, and tourism. As a direct-to-consumer beef producer, I depend on that trust. The introduction of an incinerator would undermine it and replace the region's clean, green identity with an association with Sydney's waste burden.

## **Carbon Intensity and Climate Impact**

Independent analyses show that waste incinerators are among the most carbon-intensive forms of energy production, emitting more CO<sub>2</sub> per megawatt-hour than coal when plastics are included. These emissions contradict NSW's and Australia's net-zero targets and cannot be credibly described as renewable energy.

## **Monitoring, Accountability, and Community Oversight**

Leading international facilities publish real-time emissions data and employ independent, publicly accountable monitoring. Suppose NSW were to proceed with any EfW proposal. In that case, it must require independent, real-time emissions monitoring, community and scientific oversight, baseline and ongoing environmental testing, health impact assessments, and agricultural monitoring programs. A Community and Scientific Independent Monitoring Program would ensure transparency, protect regional livelihoods, and restore public confidence.

## **Alternative Solutions**

The Global Zero Waste movement and Zero Waste City Models show how local governments can reduce waste generation by over 70% through design, policy, and education. Producer responsibility, repair and reuse hubs, composting, and circular-economy investments are proven pathways that align with NSW's climate objectives without introducing toxic emissions.

## **Conclusion and Recommendations**

As the landholder of Three Gullies Farm, I depend on the integrity of local air, soil, and water. The proposed Tarago incinerator threatens all three, as well as the social and economic fabric of this rural region. I urge the Committee to reject the Tarago and Parkes proposals, acknowledge the documented harms of incineration, establish a Community and Scientific Independent Monitoring Program, and commit to a Zero Waste Roadmap for NSW that prioritises waste reduction, recycling, and circular-economy innovation.

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