

Submission
No 799

**INQUIRY INTO PROPOSED ENERGY FROM WASTE
FACILITIES**

Name: Name suppressed

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Partially
Confidential

Submission to the Select Committee on Proposed Energy from Waste Facilities

Thank you for the opportunity to contribute to this Parliamentary Inquiry. I am a mother and concerned resident of regional New South Wales who is directly affected by the NSW Government's plan to send Sydney red bin waste in Regional NSW, specifically by the proposed Energy from Waste (EfW) facility at the Parkes Special Activation Precinct.

I recognise the importance of responsible waste management, but I reject approaches that prioritise expediency and convenience over transparency, scientific evidence, and community wellbeing.

This submission seeks to highlight systemic issues with the current process, including:

- The inappropriate use of public relations and marketing tactics to reframe or obscure project risks;
- The failure of consultation processes to meet government and best-practice standards requiring engagement proportional to the scale and impact of the project; and
- The inequity faced by regional communities who are being railroaded into hosting developments that metropolitan areas have rejected.

I urge the Inquiry to consider the cumulative health, environmental, and social impacts of these decisions, the adequacy of existing consultation frameworks, and the broader implications for regional democracy and intergenerational wellbeing

Double Standards

The NSW Government's own regulation states that Energy-from-Waste incinerators are not suitable for Sydney due to health and environmental risks. The NSW EPA ban on Energy-from-Waste in NSW uses the "precautionary principle" of prohibiting Energy-from-Waste "where there is a greater risk of harm to human health due to proximity to high population areas (now and in the future)". Yet those same risks are apparently acceptable for regional towns like Parkes.

The regulation is not equitable. The risk thresholds are being selectively applied based on geography rather than objective health criteria. Placing such a project in Regional NSW, does not eliminate the risk, it just redirects the risk to a population perceived to be of lesser value, visibility and political power.

500km from Waste Source

The NSW Government seeks to “maximise efficiencies in infrastructure, waste management, innovation and energy recovery”. Yet Energy-from-Waste is banned in Sydney and designated appropriate in Parkes, over 500km by rail (via Cootamundra) from the intended fuel source (Sydney’s landfill waste). This is not efficient waste management due to unnecessary transportation costs and emissions.

Waste contracts can also change in the future. Overseas, Energy-from-Waste facilities have been forced to import waste from other countries to remain operational.

Burning Waste isn’t Clean or Green

Thermal EfW production is not an efficient or renewable method of electricity production when using finite resources as fuel (like plastic which is made from coal, natural gas and crude oil). Compared to other energy sources, waste incineration yields relatively low energy output while emitting higher levels of greenhouse gases, undermining efforts to combat climate change.

The electricity that will be created by the project is being promoted as powering 80,000 homes each year, however, the energy created will not be used to power homes, it will be used in the Special Activation Precinct to attract other 'hard-to-place' industry.

Better Alternatives

Methods such as composting and anaerobic digestion offer environmentally friendly alternatives to manage waste, producing energy without the harmful emissions associated with incineration. Norfolk Island and Albury Council are brilliant examples of what can be achieved at a local level, where communities and Council work together on local initiatives to reduce and divert waste from landfill.

Failure to Align with International Experience

Energy from Waste is being phased out internationally due to environmental and health impacts, and in the transition to a circular economy. The continued promotion of thermal Energy from Waste through rebranding or greenwashing misrepresents its global trajectory. The NSW Government has a duty to align with evidence-based and precautionary approaches, not to use marketing tactics to justify outdated or harmful practices like waste incineration under misleading terminology such as “resource recovery” and “renewable energy.”

EfW production requires waste to be generated so that it can be used as a fuel source, using a linear, ‘take, make, dispose’ economic model. This destroys valuable resources and their embodied energy, and undermines efforts to move to a circular ‘reduce, reuse and recycle’ economy.

Countries like Wales have phased out large scale Energy-from-Waste facilities in their transition to a circular economy, as projections show that they will not generate enough waste to keep them operational throughout their operation life as they reach waste reduction and recycling targets.

Wales

The 2010 Towards Zero Waste Strategy set out that there will be “far less need for residual waste treatment facilities such as energy from waste plants with the number and/ or capacity required progressively reducing from 2025 to 2050.”

"Beyond Recycling - A strategy to make the circular economy in Wales a reality" outlines Wales' zero waste goals, defining zero waste as "where all waste that is produced is re-used or recycled as a resource, without the need for any landfill or energy recovery".

A moratorium on new large scale energy from waste plants came into effect immediately following the written statement 'Taking action to make the circular economy a reality' 24 March 2021.

The moratorium recognised the views from citizens and stakeholders during the consultation on Beyond Recycling and the advice from the UK Committee on Climate Change on the pathway needed for Wales to decarbonise. Evidence from Wales' recycling journey as a nation, as well as the accompanying reduction in waste, means that Wales has now reached the point where they will not need any new large scale energy from waste infrastructure to deal with the residual waste generated in Wales.

The moratorium on new large scale energy from waste plants covers those of 10MW or greater. Any new small scale facilities must also supply heat, and where feasible, be carbon capture and storage enabled or ready. This will therefore mean a small scale plant would not be allowable if waste is to be imported from outside of the proposed region (unless in close proximity to a region), in order to also avoid locking in transport emissions and associated pollution.

Denmark

Denmark, once heavily reliant on incineration, plans to reduce its waste incineration capacity by 30% between 2020 and 2030. They did this to align with ambitious carbon-cutting goals and expand recycling efforts.

Denmark has closed seven incinerators and halted the importing of waste for incineration.

Spain

Madrid's waste strategy, published in 2018, planned to phase out incineration by 2025, to reduce landfill use and increase recycling rates.

United Kingdom

The UK has paused permits for new incineration plants and intends to include the sector in its emissions trading scheme to meet net-zero emissions targets by 2050 and address rising greenhouse gas emissions from existing plants.

Italy (MILAN)

In 2010, Milan rejected plans for a second incinerator, opting instead for an organic waste collection service. By 2024, the city recovered 87% of kitchen waste, demonstrating effective waste segregation.

Scotland

Scotland has implemented a moratorium on new waste incinerators since 2022. This policy, announced by Circular Economy Minister Lorna Slater, aims to prevent the approval of new incineration facilities, with very limited exceptions.

The moratorium was introduced following an independent review led by Dr. Colin Church, which highlighted concerns about potential overcapacity in waste incineration and its misalignment with Scotland's circular economy and climate objectives.

USA (Minnesota)

Minnesota reclassified waste-to-energy as a non-renewable energy source in 2023. Consequently, Hennepin County is mandated to develop a plan to close the Hennepin Energy Recovery Center (HERC) between 2028 and 2040. Environmental justice advocates are pushing for an earlier closure due to pollution concerns.

USA (Colorado)

In 2024, Colorado passed Senate Bill 24-150, which prohibits the construction and operation of municipal solid waste (MSW) incinerators and plastics-to-fuel facilities statewide. This legislation was driven by concerns over toxic emissions like dioxins and mercury, particularly in low-income and BIPOC communities.

USA (Maryland)

Maryland is moving to eliminate waste-to-energy incinerators from its Renewable Portfolio Standard (RPS), which currently classifies them as Tier 1 renewable energy sources. Legislation introduced in 2024 aims to remove financial incentives for these facilities.

USA (California)

Some municipalities in California have enacted local bans or moratoriums on waste incineration.

AUSTRALIA (ACT)

The Australian Capital Territory (ACT) implemented a ban on thermal Waste-to-Energy technologies under its Waste-to-Energy Policy 2020-2025 due to strong community opposition, risk of undermining recycling and resource recovery and greenhouse gas emissions associated with Waste-to-Energy technologies.

Australia (NSW)

Under current regulations, Energy-from-Waste production is prohibited (with limited exceptions) except in four designated regional areas. NSW uses the precautionary principle for public health to minimise potential harm from Energy-from-Waste (EfW), risk of undermining recycling efforts and a transition to a circular economy, and risk of stranded assets if recycling rates improve.

Inappropriate Use of PR and Marketing Tactics

The proponents, local and state governments have promoted the project using public relations and marketing tactics such as *greenwashing, deflection, cherry-picking information, and whataboutism.*

EG. There are 2000 facilities worldwide, frequently used by the proponents and local and state governments, omits issues such as breaches, countries phasing out the technology, local opposition, recycling rates, feedstock type and separation, age of the facility, environmental contamination etc.

These approaches are wholly inappropriate for use in public consultation where fact based, independent information should be presented for the community to assess the risks prior to any decisions being made.

Communities expect governments to present full and accurate information, instead, the NSW Government is using strategic messaging that resembles corporate spin to promote their own project.

The use of marketing and PR tactics to promote contested projects that pose intergenerational health and environmental risks is unethical and incompatible with the principles of good governance. Government communication for must be science-led, transparent, and participatory, **ensuring that community concerns meaningfully influence outcomes.**

Omission of Complete and Balanced Information

Governments have a higher ethical and legal duty than private proponents to provide the public with comprehensive, evidence-based information about proposed developments. Local and state governments have omitted information, cherry picked data and deflected legitimate criticism which has mislead the public and obscured the true risk profile of the project. This is particularly concerning as this project may affect community health and wellbeing for generations.

The planning documents from the workshops in February 2019 such as [Parkes Special Activation Precinct Draft Structure Plan](#) highlight waste as being a major part of the Parkes Special Activation Precinct. The [Parkes Special Activation Precinct Economic and industry analysis Final report](#) released in August 2019, immediately prior to the project going on public exhibition in September 2019, states that the bypass and Inland Rail would allow Parkes to take waste from all over the Australia by road and rail. The waste aspect of the SAP was a large part of the planning documents but was reduced to 'Resource Recovery and Recycling' in the [Parkes Special Activation Precinct Draft Master Plan](#) that went on Public exhibition in September 2019, which had a focus on sustainability, agri-business and freight.

In the [Parkes Special Activation Precinct Master Plan](#) released in June 2020 after the consultation period, 'Energy from Waste' had replaced the words Resource and Recovery and Recycling. The Consultation Report does not describe any concern over the waste aspect of the SAP which is in stark contrast to the reaction in March 2025 when Parkes Shire Council announced the EFW project on Facebook. The [Parkes Special Activation Consultation Report](#) states that:

- a. There were 10 visitors to a pop up held in offices in Clarinda Street
- b. 6 landholders and immediate neighbours attended a community presentation
- c. 96 letters were posted to landholders in the precinct

When speaking with others in the community, most assumed the SAP was freight and agriculture based, they had no idea the precinct would focus so heavily on waste.

The deliberate omission of the words 'Energy from Waste' from the Draft Plan that went on public display, and the downplaying of the significance of waste to the Parkes Special Activation Precinct, in light of the fact Energy from Waste is campaigned against globally, appears to be calculated to deceive the community.

The lack of uptake of community consultation avenues detailed in the consultation report indicates that the consultation for the Parkes Special Activation Precinct was not sufficient for the scale of the proposal, a development 16 times the size of Sydney Olympic Park and 4.5 times the size of Parkes.

Also in 2020, Infrastructure Partnerships Australia who exist to 'shape public debate and drive reform for the national interest' released a PDF [Putting Waste to Work: Developing a Role for Energy from Waste](#) included Parkes as a case study on 'building community support for and EFW facility in Parkes', yet, the public at large knew nothing about the project or did not understand what the project was. This false messaging, of social acceptance in Parkes, on a platform to drive reform for the national interest is alarming.

Public Health and Psychological Wellbeing

Energy-from-Waste production generates toxic byproducts, including both air and ash emissions of toxic gases, heavy metals, and persistent organic pollutants (POP's) like dioxins and furans. Some forever chemicals (PFAS) are resistant to high temperatures and are also emitted. These pollutants can travel long distances, posing a risk to human health, agriculture and the environment. Australia's commitment to the Stockholm Convention emphasises the need to minimise such emissions.

World's best practice emissions testing does not require continuous monitoring of toxic heavy metals, PFAS, and persistent organic pollutants (POP's) like dioxins and furans.

Biomonitoring studies around the world have shown contamination in the environment and agriculture around Energy-from-Waste incinerators.

The manipulative communication by the proponents and local and state governments, and the suppression of risk information undermine the community's right to know, prevents informed consent, and contributes to psychological distress, particularly when people feel gaslighted and excluded from the decision-making process. The fatigue and confusion caused by multiple government frameworks having to be reviewed by the community and overlapping submission deadlines appears by design to prevent meaningful engagement.

In my personal experience, I have suffered anxiety and depression all year and will move my family away from Parkes regardless of any assurances of safety by the EPA. I will not risk the health and wellbeing of my young son or my mental health. The recent internal EPA emails relating to suppression of the lead report in Broken Hill is a clear example of how we cannot place our trust in the EPA.

Consultation Must Be Genuine Collaboration

True consultation is collaborative, meaning community feedback is actively sought, respected, and used to shape outcomes *before* decisions are finalised. Informing the public of a decision that was made behind closed doors does not constitute consultation, it is tokenistic.

When governments alter public materials, remove key terms such as "energy from waste," pre-empt outcomes before consultation periods have ended, or limit opportunities for engagement, the process loses legitimacy. Communities must be treated as partners in decision-making, not obstacles to be managed through strategic messaging.

In November 2020 the NSW Government opened the EOI for the Parkes project. In January 2021 Parkes Shire Council emailed an Inland Rail mailing list, announcing the EOI and encouraging interested parties to register their interest with RGDC.

In September 2021 Parkes Shire Council announce energy from waste infrastructure plan to the community on Facebook, explaining energy from waste and stating that the SAP has been identified as a priority location.

The post had 7 likes, 2 shares and 1 comment. An ABC Central West story from September 2021, stated "Parkes Shire Council says it supports the State Government's plans for waste to energy facility near the town, despite the Lithgow Council and Goulburn Mulwaree Councils strongly opposing the infrastructure".

The low engagement should have warranted further effort for local and state governments to provide consultation to the Parkes community given the significance of the plans.

The community was also largely unaware in March 2022 of a community feedback period for proposed changes to energy-from-waste regulations to apply the precautionary principle by banning energy-from-waste where there is a greater risk of harm to human health due to proximity to high population areas (now and into the future), and in areas where there are regular exceedances to air quality standards from existing sources - restrict new energy from waste operations and infrastructure to four designated precincts, West Lithgow Precinct, Parkes Special Activation Precinct, Richmond Valley Regional Jobs Precinct and Southern Goulburn Mulwaree Precinct.

Several community groups impacted by Energy-from-Waste from other areas, who are aware of the proposed changes, attempt to contact the Parkes community to alert our community to Parkes exclusion from the regulation's health protections via several means including the Facebook the Parkes Shire Community Noticeboard of 19.6k members, however, the posts are removed by administrators.

In February 2025 the NSW EPA Energy-from-waste options paper submissions open. The NSW EPA extends the deadline to 16th May 2025.

On the 14th May 2025 the NSW Government Waste and Circular Infrastructure feedback submissions open. The plan assumes that the Energy-from-Waste options paper will be adopted and re-enforces NSW Government plans to solve Sydney's landfill problem by building Energy-from-Waste incinerators in Regional NSW precincts. The draft plan is released while the feedback submissions for the Energy-from-Waste options paper are still open.

The final plan was just released, before this Inquiry submission period closed, without any amendments. The consultation reported is not demonstrative of the submissions received.

Conclusion

The use of marketing and PR tactics to promote contested projects that pose intergenerational health and environmental risks is **unethical and incompatible with the principles of good governance**. Government communication must be **science-led, transparent, and participatory**, ensuring that community concerns meaningfully influence outcomes.

Consultation processes that are superficial or manipulative only deepen community distress and mistrust. For projects with significant long-term consequences, honesty and collaboration are essential to responsible governance and the protection of public health. This has not been the case for Regional NSW.

Recommendations

We respectfully urge the Inquiry to recommend the following:

1. A **moratorium** on all proposals until safe alternatives are investigated that do not burden Regional NSW or place communities in a state of distress.
2. A **requirement** that any EfW or similar infrastructure in regional NSW must only proceed after **genuine, documented, independent consultation** in which local communities have **meaningful decision-influence** (not just input).
3. A **review** of the NSW EfW framework to include explicit criteria: protection of agriculture, cumulative emissions assessment, monitoring of PFAS/POP's, long-term contracts' implications for circular economy goals, the proximity principle, **and equitable health protections for all NSW residents.**
4. A **public audit** of all communications and consultation materials (including changes to wording and timeline of engagement) for transparency and accountability, for the Parkes Special Activation Precinct and Energy from Waste framework.
5. A **public audit** of all consultation materials, submissions and consultation reports, for transparency and accountability, for the:
 1. Energy from Waste Infrastructure Plan 2021
 2. Protection of the Environment Operations (General) Amendment (Thermal Energy from Waste) Regulation 2022
 3. Energy from Waste Options Paper 2025
 4. Waste and Circular Infrastructure Plan 2025
6. Greater **investment** in alternatives for local waste management initiatives that prioritise recycling, composting, waste minimisation and local resource recovery.
7. An **investigation of learnings from countries phasing out Energy from Waste.**
8. **Ensure that the rights and voices of regional communities are treated equally in decision-making processes**, with robust safeguards against two-tiered policy that prioritises Sydney over Regional NSW.

Conclusion

In sum: the proposed EfW facility in Parkes, and the process by which it has been advanced, raise profound concerns about health, environment, justice and governance. Regional communities such as ours must be partners, not passive recipients, in government planning before decisions are made that will shape our future for generations.

Thank you for the opportunity to make this submission. We look forward to working with the Inquiry to ensure that regional NSW receives fair, transparent, science-based and community-driven decision-making.