

Submission  
No 935

**INQUIRY INTO PROPOSED ENERGY FROM WASTE  
FACILITIES**

**Name:** Name suppressed

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Partially  
Confidential

# Summary Statement

This submission opposes the proposed Parkes Waste-to-Energy facility due to the unacceptable risks to human health, local agriculture, as well as the environment, and its cumulative impacts, as well as the long-term sustainability of the region. It calls for the application of the 'precautionary principle' assessment, full transparency in site selection and monitoring, and the equitable protection of regional communities to be clearly addressed and provided to the public.

## Introduction

Raised on a farm near Parkes, my family has remained committed to community values, public health, and environmental protection for over 100 years. Our farm lies directly within the dominant westerly wind corridor from the proposed waste-to-energy facility, meaning any airborne pollutants or dust released would drift across our grazing and cropping land, watercourses and home. What enters the air above Parkes will ultimately settle into our soil, our water, and the systems that support life and livelihood in this region.

I hold a bachelor's degrees in environmental science as well as a post graduate degree in Environmental Law and possess over 22 years' experience in environmental consulting, which includes work in environmental auditing, assessment, compliance and protection licensing, including work with local government, large mining companies and the NSW EPA. I am writing this submission not only for myself and my immediate family, but my extended family including my nieces, cousins, aunts and uncles who still live in the Parkes local government area.

The Parkes community did not seek this facility, yet we are being asked to bear its burden. This land is not just property it is a living legacy, our heritage, built on generations of stewardship and respect for the environment that sustains us. I have a responsibility to protect it for my children, my nieces and nephews' children and the generations that follow.

**For these reasons, I strongly oppose the proposed waste-to-energy incinerator within the Parkes Special Activation Precinct.**

## Lack of Transparency and Site Suitability

What troubles me most is the choice of a site surrounded by productive farmland as classified generally by the NSW Government **Land and Soil Capability (LSC)** system as **Class 3**. This means that area has been assessed as possessing a high agricultural capacity and is suitable for cropping and grazing with minimal limitations. The selection process of utilisation of productive agricultural land has lacked transparency, and residents haven't been given independent, peer-reviewed studies on how emissions, ash, or runoff could affect their land, livestock, or surface water sources.

In Western Sydney, the NSW Independent Planning Commission (IPC) rejected the Eastern Creek incinerator in 2018 due to uncertainty around emissions, health risks, and proximity to homes. If that project couldn't meet safety standards in a metropolitan area, and the precautionary principle applied to their homes, lives, watercourses and land, it's unjust and unfair not to impose the same principle to regional lives, homes and land in regional communities, such as Parkes. Unless the State Government is willing to accept the impact to public health, the environment and the regional community has been adequately and scientifically proven to be modelled as close to zero, NSW Planning, as per the precautionary principle, should not approve this development. One life in Western Sydney should not be worth more than one life in rural NSW.

To also note is the historical precedent set in Bogan Gate (also within the Parkes LGA) – where a toxic waste incinerator proposal (1990s) was abandoned after widespread opposition from farmers and cattle producers, who recognised the risks to livestock and market integrity (Findlay, 1991). Has this been conveniently forgotten by the current State government?

To note there has been no proximity mapping or peer-reviewed detailed impact plume analysis released for the current Parkes proposal. Until detailed transparent assessments and sensitive-receiver maps are published, the community can't properly evaluate exposure risks. I understand that incinerator pollutants, including fine particles, heavy metals, and dioxins can travel several kilometres. Studies show contamination up to 10 km from incinerator sites. With the proposed facility just 3 to 4 km from Parkes, my family, our home, our land, our waterways and the wider Parkes community is well within the plume impact zone. Without rigorous peer reviewed modelling, we are being asked to accept risks that haven't been properly assessed. I do not feel plume impacts have been adequately addressed by the proponent, nor does modelling give realistic plume impacts based on Parkes climatic data, and future climatic data. It can be speculated that environmental licensing conditions imposed on the development will not alleviate the future impacts of this facility on current and future residents' health and the environment. Unless the perceived impact and the emissions of this development are demonstrated to be zero – or close to zero – the NSW State government should not approve this development.

## Question for the Parliamentary Inquiry:

**Why has this site been selected without transparent, peer-reviewed assessment of its agricultural and human health risks and how can it meet site-suitability criteria that metropolitan areas could not satisfy?**

## The Precautionary Principle and Intergenerational Equity

I understand that under NSW legislation, decision-making should be guided by the precautionary principle and intergenerational equity, Conservation of Biological Diversity and Ecological Integrity and Improved Valuation, Pricing and Incentive Mechanisms. These principles mean that when there is a risk of serious or irreversible harm, we act cautiously and protect future generations.

Research indicates what human health impacts chemicals like dioxins and heavy metals have, and the scientific research is frightening. These pollutants can linger for decades in soil and water, affecting not just the environment but also human health. Once contamination occurs, it cannot be undone within a human lifetime. You can't un-poison a creek or restore polluted soil to fertility—just look at the ongoing issues with PFAS, a group of industrial chemicals now known to persist in the environment for decades. For a farming community like ours, that risk isn't theoretical. It's deeply personal.

Clear human health factors of waste incineration not adequately addressed by the proponents and supported by documented scientific literature include:

- **Respiratory impacts** — Emissions from incinerators contain fine particulate matter and combustion by-products that increase local ambient pollution and are associated with increased hospitalisations for COPD and asthma), so respiratory effects observed in systematic reviews are directly relevant to incinerator emissions and nearby communities (Ranzi et al., 2025).
- **Cancer risk** — Persistent combustion of by-products released from incinerators, such as dioxins, furans and certain metals, are established or probable and known carcinogens and this indicates epidemiologically known associations with some cancers, making incinerator emissions a plausible contributor to elevated cancer incidence over long term expose periods (Ranzi et al., 2025; Porta et al., 2009).
- **Reproductive and developmental harms** — Systematic assessments identify associations between proximity to waste incineration and congenital anomalies, miscarriage, infant death and early-life neoplasias, this includes for rural agricultural settings. The dominant exposure route is ingestion of contaminated from foodstuffs following deposition of persistent pollutants (Cordner et al., 2019).

This is also about intergenerational equity, another principle our laws recognise and one that farming families have lived by for generations. The decisions made today must not compromise the wellbeing of the generations that follow.

Other governments have already shown leadership. The ACT Government has banned new large-scale waste-to-energy incinerators, citing uncertainty about health and environmental impacts and incompatibility with the circular economy. If such facilities are considered too risky in the ACT, where urban infrastructure and oversight are more robust, how can they be appropriate for a farming region like Parkes, where families live on the land, drink from rainwater and bores, and depend on clean air and soil for their livelihoods?

## Questions for the Parliamentary Inquiry:

**How can this project proceed when the precautionary principle has not been applied, and the community has not been provided with independent, peer-reviewed evidence that emissions and residues will not harm soil, water, livestock, or human health?**

**How does approving this proposal align with intergenerational equity, given the potential for long-term contamination and health risks that could affect future generations?**

**What long-term safeguards and accountability measures will ensure that regional families and future generations are protected if harm emerges years or even decades after the facility begins operating?**

## Red-Bin Residual Waste

I understand the waste intended for this facility is described as household red-bin residual waste, the general rubbish collected from Sydney homes that cannot be recycled or composted. Under NSW's Energy from Waste framework, only genuine residuals are eligible, and proponents must meet strict resource recovery and performance criteria. On paper, that sounds reassuring. In reality, anyone who lives in a household knows what ends up in the red bin- it's often a mix of materials that don't neatly fit into the categories provided by council services—some of which may be recyclable, hazardous, or poorly sorted.

Across NSW, the EPA and local councils continue to warn that batteries, small asbestos fragments from home renovations, and chemical containers still end up in red-lidded bins, despite being banned. Once mixed with general rubbish, asbestos is almost impossible to detect, and even a small fragment can release fibres that remain hazardous. Batteries are already causing fires in waste trucks and transfer stations across NSW, with incidents documented in regional centres like Dubbo and the Tweed. These real-world problems show that contamination is not a rare exception. It is part of the system.

Proponent statements say hazardous waste will not be accepted but provide limited detail on how that will be guaranteed in practice, such as independent verification, contamination thresholds, or public reporting of rejected loads. In practice, screening typically means visual checks and mechanical sorting, not chemical testing. These methods cannot reliably detect microscopic or chemically hazardous materials. That

is not enough when the consequences can include toxic ash, contaminated soil, or airborne fibres carried on the wind across farming land, our waterways, town and local community.

### Question for the Parliamentary Inquiry:

**What systems will NSW regulators implement to ensure that household red-bin waste from Sydney is independently screened, transparently audited, and publicly reported before combustion, so that regional communities like Parkes are not exposed to contamination risks that should have been prevented at the source?**

## The UAE Example

When I first heard about this proposal, I researched similar projects overseas, including one of the largest facilities located in the United Arab Emirates. The UAE's large-scale waste-to-energy facilities, such as the Warsan Plant in Dubai, are in industrial desert zones built to manage local urban waste in arid environments with minimal rainfall and no agricultural activity. They were never designed to process imported waste in fertile farming regions like ours.

Air-quality monitoring in Dubai regularly records levels that are considered unhealthy for sensitive groups, and on bad pollution days the air quality can reach levels or concentrations unhealthy for everyone — conditions that would be unimaginable in Parkes, where we are blessed with consistently clean, fresh air.

Unlike the UAE, which relies almost entirely on desalinated seawater and industrial systems, our region depends on rainfall, farm dams, clean catchments and groundwater bores to sustain crops, livestock, and families. Personally, I drink tank water collected from our roof and stored on our property. That means any airborne pollutants, including ash or chemical particles, don't just affect the air we breathe they risk contaminating the very water my family drinks every day.

### Key question for the Parliamentary Inquiry:

**How can technology developed for a desert industrial environment — where water is supplied through desalination and land use is industrial — be considered suitable for a region like Parkes, where families live on the land and rely on local rainfall, groundwater, and soil health for their livelihoods?**

## Transport Impacts — The Burden on Regional Communities

The waste for this project will travel more than 500 kilometres from Sydney to Parkes. Whether by rail or road, that distance adds diesel emissions, noise, dust, and safety risks. Once the waste arrives, local truck movements further increase road wear and industrial traffic near farms and schools. Along the rail corridor, agricultural lands that border the line may also be impacted—through increased dust

deposition, noise disturbance to livestock, and potential litter or contamination risks—posing further challenges for farmers who rely on clean, healthy environments to sustain their livelihoods.

I understand that NSW's strategic approach to waste and energy recovery emphasises placing infrastructure in locations that suit their purpose. Long-standing policy work in NSW and nationally has recognised the proximity principle, managing waste as close as practicable to its source to reduce transport risks, costs, and environmental impacts. This proposal contradicts that principle by shifting Sydney's waste burden onto a regional community that did not produce it and will not benefit from it.

Additional burdens as identified through the scientific literature that has not been adequately considered or addressed include:

- **Air quality:** Dozens of freight train movements daily will emit diesel particulates (PM2.5) and nitrogen oxides along the transport corridor (Giusti, 2009).
- **Noise and vibration:** Chronic exposure is linked to cardiovascular stress and sleep disturbance (Porta et al., 2009).
- **Safety:** Increased freight traffic raises derailment and accident risks, particularly when transporting mixed municipal waste.
- **Cumulative exposure:** Communities along the rail corridor face double exposure—from transport emissions and incinerator fallout.

## Question for the Parliamentary Inquiry:

**Has the NSW Government conducted and published a transparent assessment showing that reasonable and practicable alternative sites were considered for the Parkes incinerator proposal, including land within designated Renewable Energy Zones whose zoning and policy intent prioritise electricity generation and associated industrial use.**

The Parkes incinerator proposal lacks publicly available evidence that reasonable and practicable alternative sites were identified and assessed, including land within designated Renewable Energy Zones whose planning intent prioritises electricity generation, transmission and associated industrial uses. It is unclear whether the NSW Government has properly investigated alternative sites, including locations within designated NSW Renewable Energy Zones that are largely depopulated, have existing rail infrastructure, established high-capacity electricity networks, and land-use histories compatible with industrial or energy purposes (for example, former or existing mine sites).

A thorough comparative assessment should include mapped candidate REZ locations, analysis of population and land-use suitability, rail and grid connectivity, technical feasibility, and quantified environmental and socio-economic impacts for each option. The NSW Government and proponent must publish the data, assumptions and justification used to exclude any REZ sites, demonstrating compliance with the *Environmental Planning and Assessment Act 1979* and current NSW REZ policy objectives to enable independent verification and meaningful public scrutiny.

## Question for the Parliamentary Inquiry:

**How can a plan that hauls Sydney's waste more than 500 kilometres through rural communities, adding to emissions, noise and transport risk be consistent with various NSW policy objectives to manage waste (and noise) efficiently and as close as practicable to its source?**

## Threat to Agricultural Land

The Parkes district is a significant centre of grain and livestock production within central NSW. Our family's cattle operation relies on trust, including Livestock Production Assurance (LPA) declarations that animals have not been exposed to residues or contaminants. Even trace levels of pollutants such as dioxins or heavy metals could trigger testing, compromise those declarations, and damage market confidence – including export markets.

There is real-world evidence of this risk. In Iceland, a small municipal waste incinerator located in a farming valley was linked to elevated dioxins in nearby milk and beef, with samples exceeding regulatory limits. This occurred through deposition on pasture, which was then consumed by livestock, a clear demonstration that incinerator emissions can enter the food chain. Australia has already shown caution: the Independent Planning Commission refused the Western Sydney energy-from-waste project due to unacceptable uncertainty in air quality, health risk, and site suitability. The ACT Government has also prohibited large-scale energy-from-waste facilities on policy grounds.

For farming families, this is not theoretical. Once contaminants lodge in soil, pasture, and water, they are extraordinarily difficult to remove. That is not just an environmental problem, it is an existential one for our LPA assurances, our herd reputation, and Australia's food brand.

## Question for the Parliamentary Inquiry:

**What systems will be in place to ensure that contamination from air emissions, ash, or runoff cannot reach agricultural soils, water, or livestock in one of Australia's most productive food regions — and what safeguards will protect market integrity through testing, public reporting, and compensation if contamination is detected?**

## Single-Breach Risk

I understand that any breach will be met with fines or enforcement. But for a regional farming district, a single breach may already be one too many. Emissions exceedances, handling failures, or feedstock contamination events can have irreversible consequences for soils, water, health, and market trust. We need assurances that for large operators backed by international investment, such penalties aren't simply absorbed as a cost of doing business.

The proponent's plan does acknowledge this risk by committing to continuous emissions monitoring, third-party verification, and public reporting of non-compliances. These measures are welcome in principle, but they remain reactive

and depend on identifying a breach after it occurs. For regional residents who rely on tank water and local catchments, prevention and transparency are non-negotiable. Once contamination happens, there's no refund, no reversal.

Enforceable, independent, real-time monitoring with immediate meaningful community notification of any breach or exceedance is required. Such safeguards must be a condition of approval, not an optional internal policy. Without this, financial penalties risk becoming just another operational cost for large corporations, while the irreversible consequences fall on local families, farms, and ecosystems.

### **Property Acquisition and Health Protections**

If this project proceeds, it is essential that a formal property acquisition and compensation process be established for residents whose health or livelihoods are adversely affected. This should include those with pre-existing health conditions that may be exacerbated by emissions, as well as landowners whose properties are within areas modelled to be impacted by air pollution, dust, or noise. Furthermore, if monitoring data after the facility begins operation shows adverse impacts to air quality, water, or soil, affected residents must have the right to seek acquisition or compensation. No community should be forced to remain in a compromised environment without recourse.

### Question for the Parliamentary Inquiry:

**If this risk of irreversible contamination cannot be fully prevented, and the social, economic and environmental costs fall on the local community, how can this project be justified, or ethically approved?**

## A Better Path Forward

There are cleaner, safer, and more community-minded ways to manage waste than burning it. NSW has committed to halving the amount of organic waste sent to landfill by 2030 and investing in circular economy infrastructure. Composting, organics recovery, anaerobic digestion, and biochar can create local jobs, reduce emissions, and improve soil health — solutions that align with managing waste close to its source and strengthening regional resilience.

### Question for the Parliamentary Inquiry:

**Why pursue long-distance waste incineration in a farming region when cleaner, proven, and locally beneficial alternatives already exist and when similar incineration projects have already been ruled unsafe or unsuitable in other jurisdictions?**

## Claimed Benefits — “Clean Energy” and “Local Jobs”

I understand that Parkes Shire Council and the project’s backers have spoken about the potential benefits of this proposal, particularly its promise of clean energy and local jobs. I do not dismiss the need for progress or opportunity in our region, but when you look a little closer, these claims do not tell the full story.

### The “clean energy” claim

The company’s own Community Q&A confirms that:

*“As part of their normal operating procedure, Energy-from-Waste (EfW) facilities produce emissions... Emission of any compounds that are considered a pollutant make up much less than 0.1% on a volume basis.” — Parkes Energy Recovery Pty Ltd, Community Q&A*

Although the company describes this as a “very small” amount, it is still an admission that pollutants will be released into the environment. For a community like ours, where families live downwind, drink from rainwater tanks, and depend directly on the land, any emission is too much. As outlined earlier regarding the red-bin waste feedstock, the “clean energy” claim depends entirely on the assumption that only approved, non-hazardous materials will be burned. We know that is not realistic. Sydney’s red-bin waste inevitably contains contaminants — meaning those so-called “very small” emissions may carry harmful substances that have no place in our air, water or soil. And while the company claims that pollutants will make up less than 0.1% of total emissions, this figure is relative. Given the scale of the facility, even a fraction of a percent could equate to thousands of cubic metres of polluted air released into the environment each year—raising serious concerns for the health of our community and the integrity of our land.

This is exactly why other jurisdictions including the NSW Independent Planning Commission for Western Sydney and the ACT Government have already decided that such risks are unacceptable. These decisions reflect a broader recognition that such risks are incompatible with community health and environmental protection regardless of location. What our community needs explained is why these same risks are considered unacceptable in Sydney and Canberra, yet somehow acceptable in Parkes.

### The “local jobs” claim

The project has been promoted as the biggest investment in Parkes’s history, expected to create hundreds of construction jobs and around 50 to 60 ongoing operational roles. Of course, job creation is important, but the question is what kind of jobs, and at what cost.

If even a fraction of this funding were directed toward safer, sustainable alternatives such as regional recycling, composting, or bioenergy projects, those same employment opportunities could be created without the health and environmental risks. These industries are growing across Australia and overseas, providing stable, skilled work while restoring soil health, improving sustainability, and supporting local agriculture.

In a region like ours, the most enduring jobs come from the land itself, from healthy soils, clean water, and trusted food production. Once those are damaged, no number of short-term construction jobs can repair the loss.

### **Impact on the Parkes Elvis Festival**

The Parkes Elvis Festival is one of the region's most iconic and economically significant events, contributing over \$15 million annually to the local economy. It draws thousands of visitors from across Australia and internationally, supporting local businesses, accommodation providers, and community groups. However, the presence of a large-scale waste incinerator on the town's doorstep risks undermining this success. Who would want to attend a celebration of music, culture, and community in the shadow of a pollution-generating facility? The reputational damage alone could deter visitors, reduce tourism revenue, and jeopardise the long-term viability of the festival. If the festival were to decline or fail, the economic fallout would be felt across the entire Parkes Shire—impacting jobs, small businesses, and the town's national profile.

### Question for the Parliamentary Inquiry:

**How can this project be promoted as “clean energy” and a “jobs boost” when it involves pollutant emissions, relies on unrealistic assumptions about waste composition, and offers limited long-term employment — especially when safer, proven alternatives could deliver similar or better local benefits without compromising health or environmental integrity?**

## The Unknowns

As a community, we still do not truly know the full picture of what this proposal means for the Parkes Community or for regional NSW in the years to come. While the focus has been on this one waste-to-energy facility, it is clear from official documents that the project sits within a much larger industrial plan: the Parkes Special Activation Precinct. This includes a “Resource Recovery and Recycling” zone intended to attract other waste and energy developments. This raises important questions about what else might be planned for our region that has not yet been disclosed. This is without transparency to the local community.

We are being asked to accept Sydney's red-bin waste today, but is this just the beginning? Once this plant is established, will Parkes become the dumping ground for the state? What other facilities, landfills, or ash-processing plants could follow? Where will the ash and residues from the incinerator actually go and who will ensure they are safely contained for decades to come? None of this has been made clear.

Reports suggest the facility could process more than 600,000 tonnes of waste transported from Sydney. That is an enormous amount of waste to move into a regional area whose identity, economy, and reputation are built on clean air, safe water, and quality food production. If that is what is being proposed today, what happens tomorrow when there is even more waste to deal with? When does the precautionary principle apply to us, not just western Sydney? When is a rural life equal to that of a ‘Sydney sider’, and when do the people of Sydney start being

responsible for their own waste, and maybe just maybe produce less (implementing waste strategies such as in the EU like countries as Germany).

Our community takes pride in being known for producing healthy, safe food and raising families in a clean, country environment. Becoming known instead as the state's waste destination would be devastating not just for our image, but for how we feel about the place we call home. It is not a risk we should be asked to take without full transparency and proof that this is truly safe not just for now, but for decades ahead.

Because every unanswered question about what is planned next, where the waste comes from, where the ash will go, is another reason for concern. And when the health of our people and the integrity of our land are on the line, uncertainty is not good enough.

### Question for the Parliamentary Inquiry:

**What other projects, facilities, or waste-related expansions are being considered as part of this broader initiative and how can the community make an informed decision when so much remains undisclosed?**

## Conclusion

The Parkes waste to energy incinerator proposal is clearly inconsistent with the precautionary principle for public health (it shouldn't matter where you live – every life should be valued the same), threatens prime agricultural land and grazing (cattle and sheep) industries, imposes additional burdens from freight transport, has not clearly demonstrated the assessment of alternative locations, and reflects a policy double standard between metropolitan and regional NSW. Plume analysis confirms that emissions will disperse across farmland, waterways and communities, compounding risks already identified in the scientific literature.

**My family and I respectfully request that the NSW Government and Planning department reject this proposal in its entirety.**

Throughout this submission, I have raised serious concerns about air quality, agricultural contamination, impacts to waterways, transport impacts, waste risks, and the broader industrial context. Until all these concerns have been independently, transparently, and scientifically addressed with peer-reviewed evidence proving that this project is completely safe for our environment and local human health, now and for generations to come, this project should not proceed.

Regional communities deserve the same protection, transparency, and respect afforded to metropolitan areas. We deserve a voice in decisions that affect our future.

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