

**Submission
No 1047**

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Organisation: Western Sydney Direct Action

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SUBMISSION TO THE SELECT COMMITTEE ON PROPOSED ENERGY FROM WASTE INCINERATION

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1. Introduction

Western Sydney Direct Action welcomes the opportunity to provide evidence to the Select Committee on Proposed Energy from Waste Incinerators.

Our submission draws on peer reviewed science, international policy, Australian health reviews and community experience.

We have serious concerns that energy from waste (EfW) incineration across NSW, Tarago (Woodlawn) and Parkes will:

- worsen air pollution and health outcomes
- threaten agriculture, water and soils
- undermine a genuine circular economy
- expose NSW to long term climate, ash and liability risks.

We address each term of reference in turn.

2. (a) Technology performance

“The performance of the technologies proposed for the Tarago and Parkes Energy Recovery Facilities as compared to leading thermal technologies employed in ‘state of the art’ facilities internationally, noting such technologies as proposed are not employed anywhere else on the Eastern seaboard.”

The Tarago and Parkes incinerator proposals are based on large moving grate mass combustion of mixed residual waste. This is long established technology, not an innovative solution. It has been used in Europe and the UK for decades. What is often portrayed as “state of the art” relates mainly to add on air pollution control systems, not to the core incineration process.

International experience shows three flawed assumptions behind “world’s best practice” claims:

- that there are safe emission levels for all pollutants produced
- that monitoring precisely captures what is released, including short term peaks and bypass events
- that operating within licence limits guarantees safety for nearby communities and food production.

European regulations had to be tightened after many years of high dioxin emissions from incinerators. Incinerators were then fitted with more advanced filters and sorbents. Even today, emission standards do not cover all pollutants of concern, including PFAS, brominated dioxins and microplastics.

Zero Waste Europe’s analysis shows that, in climate terms, typical European EfW incinerators emit around 540–580 grams of CO₂ equivalent per kilowatt hour of electricity. This is about twice the EU grid average and significantly higher than gas fired power. That performance is not consistent with claims of “clean and modern” technology.

Ferrybridge 1 and 2 in West Yorkshire are widely cited reference incinerators. Together they treat up to 1.45 million tonnes of residual waste each year and generate roughly 170 megawatts of electricity. Using the 540–580 g CO₂e/kWh range, Ferrybridge emits on the order of 0.8–1 million tonnes of CO₂ equivalent per year. The UK government now treats decarbonisation of Ferrybridge through large scale carbon capture as a project of “national significance”. This underlines how carbon intensive incineration remains.

In short:

- the core technology proposed for Tarago and Parkes is conventional mass burn, not advanced

- pollution controls have been upgraded over time in response to harm, not because the technology is inherently clean
- international practice now questions the climate and health performance of EfW Incineration.

Key references (a)

[ATSE, *Towards a Waste Free Future*, 2020.](#)
[enfinium, "Ferrybridge 1 and 2 – Background." 2024.](#)
[UK Department for Energy Security and Net Zero, *Ferrybridge Carbon Capture Section 35 Direction Request*, 2024.](#)
[Tait P. et al., "The health impacts of waste incineration: a systematic review." *Aust NZ J Public Health*, 2020.](#)
[Tait P. et al., ANU/University of Melbourne, *The Health Impacts of Waste Incineration*, 2020.](#)
[Zero Waste Europe, *The Impact of Waste to Energy Incineration on Climate*, 2019.](#)
[Zero Waste Europe, *Understanding the Carbon Impacts of Waste to Energy Incineration*, 2022.](#)

3. (b) Spread and quality of emissions

"The spread of the emissions predicted and the quality of emissions to be generated."

Modern incinerators do not emit only carbon dioxide and steam. They release a complex mixture of fine and ultra fine particles, nitrogen oxides, sulphur dioxide, carbon monoxide, acid gases, heavy metals and persistent organic pollutants such as dioxins and furans. They also generate large quantities of fly ash and bottom ash which concentrate many of these contaminants.

Emissions reported are usually averaged over hours, days or months. Communities breathe whatever is in the air at the time, including short term peaks. These peaks occur during start up, shutdown, malfunctions and any bypass of air pollution control systems. Several European studies show that some of the highest dioxin emissions occur during these "other than normal operating conditions".

As cleaned flue gas cools after leaving the filters, dioxins can reform in a process known as de novo synthesis. This means that the actual toxic load downwind can be higher than indicated by stack measurements alone.

There are also pollutants for which there are no specific limits or no reliable controls, including:

- PFAS
- brominated dioxins
- micro and nano plastics.

These substances have been detected in emissions, ash and surrounding environments near European plants. Current NSW EfW policies and the EPA Energy from Waste Policy Statement do not yet directly address these pollutants.

In summary:

- Emissions from EfW incinerators are complex and include many regulated and unregulated contaminants
- Averaged stack data underestimates real peak exposures
- The spread of pollutants via air, ash and wastewater is wider and more persistent than current assessments capture.

Key references (b)

[NSW EPA, *Waste and Circular Infrastructure Plan, 2025*.](#)

[NSW EPA, *NSW Energy from Waste Policy Statement, revised 2021*.](#)

[EU BREF, *Best Available Techniques Reference Document for Waste Incineration, 2019*.](#)

[Dioxin20xx, "PCDD/Fs in Waste Incineration Fly Ash," 2017.](#)

[IPEN, *Toxic Ash Poisons Our Food Chain, 2017*.](#)

4. (c) Health impacts – older and newer incinerators

“Health impacts from currently operating older technology waste incinerators as compared to the proposed newer technology.”

An Australian systematic review by Tait and colleagues examined 93 peer reviewed studies on health outcomes near waste incinerators. It found:

- Significant associations between residence near incinerators and some cancers, congenital anomalies, infant deaths and miscarriage
- Evidence of increased adverse reproductive outcomes and some site specific cancers
- Insufficient evidence to consider any incinerator safe.

The review emphasised that many “modern” facilities have not operated for enough time for long latency diseases, such as many cancers, to fully appear in the epidemiological record. It concluded that the precautionary principle should apply and that waste minimisation should be the priority.

The Public Health Association of Australia (PHAA) has issued two key position papers. The first is a systematic review of health impacts that supports Tait’s conclusions. It states that “*new incinerators should be located away from areas of food production*” and that “*food grown near an incinerator should be avoided*”. The second uses an economic and social justice lens and concludes that, in a true circular economy with renewable electricity, future EfW projects are unjustifiable.

International evidence reinforces these concerns:

- A Japanese study of 450,807 primary school children found higher rates of wheeze, headache, stomach ache and fatigue in schools closer to incinerators, with strongest associations within 4 kilometres.
- Spanish national work found higher cancer mortality, and particularly stomach, liver, kidney, pleura and ovary cancers, in towns near incinerators and hazardous waste incinerators.
- Analyses from the UK Small Area Health Statistics Unit have documented clusters of non Hodgkin lymphoma and myeloid leukaemia near some incinerators, including in Dundee.

At the same time, the broader fine particle literature is clear:

- Long term exposure to PM2.5 is linked to increased all cause, cardiovascular and lung cancer mortality.
- NSW and national risk assessments have found that current particle levels shorten life expectancy and cause hundreds of premature deaths annually.
- There is no evidence of a safe threshold for long term PM2.5 exposure.

Incinerators add a local source of PM2.5 and very fine particles. Baghouse filters capture most PM10. Evidence to UK and Irish inquiries shows collection efficiency is lower for PM2.5 and very low for ultrafine particles. These smallest particles penetrate deep into the lungs, can cross into the bloodstream and may reach the brain. There are currently no specific Australian air quality standards for ultrafine particles.

In short:

- Older incinerators have clearly caused health harm
- There is no robust evidence that newer incinerators are safe, especially over decades
- The precautionary principle and public health advice argue against locating any large incinerators near communities and food production.

Key references (c)

[Tait P. et al., "The health impacts of waste incineration: a systematic review," 2020.](#)

[Tait P. et al., ANU/University of Melbourne, 2020.](#)

[NEPC, *Health Risk Assessment of Air Pollution in Australia*: Climate Council, *Airborne Hazard*, 2024.](#)

[Thurston G.D., *Wheelabrator Health Impacts*, NYU School of Medicine, 2017.](#)

[Miyake Y. et al., "Relationship between distance of schools from the nearest municipal waste incineration plant and child health in Japan," 2005.](#)

[UKWIN / Professor Vyvyan Howard, *Particulate Emissions and Health – Statement of Evidence*, 2009.](#)

[Rodríguez E. et al., "Public health impacts associated with incinerators – a compilation," 2013.](#)

[Nottinghamshire County Council. Particulate Emissions and Health – Evidence to Ringaskiddy Inquiry, 2009.](#)
[PHAA, Submission to the NSW Inquiry into Proposed Energy from Waste Facilities, 2025.](#)

5. (d) Impacts on human health via water, rainwater and soil

“Impacts on human health including on regional town drinking water, rainwater harvesting and soil contamination.”

Pollutants released from incinerators do not remain in the air. They settle onto roofs, soil, vegetation and water bodies. In regional NSW many households rely on rainwater tanks, private bores and farm dams. This creates additional exposure pathways.

Fine particles that carry dioxins, PFAS, heavy metals and other contaminants deposit on roofs and are washed into tanks with rainfall. Most household systems do not have any treatment capable of removing these substances once they enter stored water. Deposition onto catchments feeding water supplies, rivers and dams can also lead to contamination of drinking water and irrigation sources.

Soils within the fallout zone of incinerators accumulate metals and POPs over time. These are then taken up by pasture and crops and by free range poultry and cows. European monitoring around “*best practice*” incinerators has found elevated dioxins, PFAS and metals in eggs, milk, meat, soil and moss up to many kilometres from stacks. In parts of France this has led health authorities to advise against the consumption of backyard produce in affected communities.

The World Health Organization notes that indirect exposure via food and water can be more important than direct inhalation for dioxins, furans and some metals. This is especially relevant where people grow food, raise animals and collect rainwater near a proposed incinerator.

In summary:

- Incinerators create multiple exposure pathways through rainwater, drinking water, soil and food
- These pathways are particularly important in rural and urban regions
- Current NSW assessments have not fully addressed these routes or their long term implications.

Key references (d)

[IPEN, Toxic Ash Poisons Our Food Chain, 2020.](#)

[Zero Waste Europe, The Hidden Impacts of Incineration Residues, 2019.](#)

[IPEN, Toxic Ash Poisons Our Food Chain \(technical report\).](#)

[WHO, Waste Incineration and Public Health;](#)

[Broome, RA et al. 2021. “The health impacts of ambient air pollution in Australia.” International Journal of Environmental Research and Public Health.](#)

6. (e) Impacts on agriculture locally and regionally

“The impact on agriculture locally and across the wider region.”

Agriculture depends on clean air, water and soil and on market confidence that food from a region is safe. The international record around “*modern*” incinerators is increasingly at odds with these conditions.

Independent monitoring in Europe has shown:

- Elevated levels of dioxins, PCBs and other POPs in eggs from hens kept near incinerators and ash reuse sites
- Contamination of meat, milk and soil near plants in several countries
- PFAS and metals in ash and surrounding environments.

In the Netherlands, government reports have warned of risks to soil, groundwater and surface water from bottom ash use and noted a high risk of fraud and misclassification because bottom ash has a negative market value. Zero Waste Europe and IPEN highlight that current “*useful*” applications of ash in construction and civil works can lead to widespread contamination of farmland and waterways.

The Public Health Association of Australia advises that new incinerators should not be located near food production and that food grown near incinerators should be avoided. For regions such as Parkes and Tarago, whose economies rely on livestock, crops, wine and other agricultural industries, these warnings carry significant weight.

Trade and reputation are also at risk. Australia’s export markets are sensitive to contamination issues. Any association of NSW regions with dioxin or PFAS contamination from incinerator ash or emissions could jeopardise access for meat, dairy, grain and horticultural products.

In summary:

- Incinerators and ash reuse threaten agricultural land, livestock, crops and water
- Contamination events and perception risks can damage regional economies and export markets
- Locating EfW incinerators in or near agricultural regions is inconsistent with “*clean and green*” branding.

Key references (e)

[IPEN, *Toxic Ash Poisons Our Food Chain, Updated 2020.*](#)

[Zero Waste Europe, *The Hidden Impacts of Incineration Residues, 2019.*](#)

[IPEN, *Toxic Ash Poisons Our Food Chain \(technical report\).*](#)

[Zero Waste Europe, *The Hidden Impacts of Incineration Residues, 2019.*](#)

[PHAA, *Submission to the NSW Inquiry into Proposed Energy from Waste Facilities, 2025.*](#)

7. (f) Parkes Special Activation Precinct

“Alterations to the Parkes Special Activation Precinct specifically in relation to the proposed Energy Recovery Facility in that region.”

The Parkes Special Activation Precinct (SAP) was conceived as a hub for clean logistics, advanced manufacturing and agriculture. It was not presented to the community as a destination for waste.

The proposed Parkes EfW incinerator is designed for around 700,000 tonnes per year of mixed waste. It would function as a regional incinerator. The health, environmental and reputational impacts would be borne by Parkes and its surrounding communities.

Locating a large incinerator within the SAP would:

- Shift the narrative from clean industry to waste burning
- Deter some investors, residents and tourists
- Tie rail, land and planning efforts to a single high risk incineration technology.

This sits uneasily with claims that the SAP will deliver “*world class*” sustainable development.

In short:

- An EfW incinerator is inconsistent with the original objectives of the Parkes SAP
- It introduces long term health, agricultural and reputation risks
- Community opposition should be given serious consideration.

Key references (f)

[Parkes Shire Council, *Submission on Parkes Energy from Waste Proposal, 2025.*](#)

[NSW Government, *Parkes Special Activation Precinct Master Plan, 2020.*](#)

8. (g) Long term waste dumping in the Tarago region

“Impacts of waste dumping over a number of decades in the Tarago region.”

The Tarago and Woodlawn area has received waste for two decades through the large bioreactor landfill. The community has lived with odour, heavy truck traffic, noise and ongoing concern about leachate and groundwater contamination.

Many people in the region feel they have become a long term dumping ground for waste. Approval of a large incinerator at Woodlawn would increase this legacy. It would turn the site into a combined disposal and incineration complex, adding stack emissions, ash transport and fire and explosion risks on top of the existing burdens.

These cumulative impacts have not been fully assessed. Past approvals have treated each expansion or new project in isolation.

NSW now has a choice:

- It can lock the Tarago region into another generation of waste infrastructure with higher risks
- Or it can chart a path to reduce waste and build advanced sorting, organics processing, clean energy and rehabilitation at Woodlawn.

We support the second path.

Key references (g)

[Veolia, Woodlawn Bioreactor Environmental Assessment, 2004.](#)

[NSW Planning, Woodlawn Bioreactor Project Approvals, 2000–2020.](#)

[Goulburn Mulwaree Council, Resolution Opposing Woodlawn EfW, 2025.](#)

[Community submissions to NSW Planning on Woodlawn projects, 2016–2025.](#)

9. (h) Emission monitoring methodology

“The methodology of emission monitoring employed by leading large scale waste to energy facilities in Australia and across the world.”

In parts of Europe, large incinerators are required to operate continuous emissions monitoring systems (CEMS) and publish data online in close to real time. These systems measure key pollutants such as NO_x, SO₂, CO, dioxin, Mercury, particulates, HCl and TOC. Some jurisdictions supplement CEMS with networks of ambient monitors and biomonitoring of soils and food.

By contrast, Australian and NSW practice focuses on:

- Periodic stack tests for some pollutants
- CEMS for a limited set of parameters
- Annual reporting to regulators, with limited public access to raw data.

Experience in the UK and elsewhere shows why this is inadequate. Freedom of information requests and community watchdogs have uncovered hundreds of permit breaches and frequent exceedances at incinerators that were publicly described as clean and compliant. Averaged data and occasional sampling can miss short but intense emission spikes and bypass events.

Current NSW frameworks fall short of this standard.

Key references (h)

[NSW Planning, *Energy from Waste – Assessment Framework*, 2025.](#)
[NSW EPA, *NSW Energy from Waste Policy Statement*, 2021.](#)
[EU BREF, *Reference Document for Waste Incineration*, 2019.](#)
[IPEN, *Toxic Ash Poisons Our Food Chain*, 2017.](#)
[UK incinerator breaches, 2025](#)

10. (i) Alternative Solutions for Greater Sydney's Residual Waste

Alternative solutions to reduce and manage residual waste produced by Greater Sydney.

The volume of "residual" waste in Greater Sydney is not fixed. It reflects policy choices about product design, separate collection and resource recovery.

NSW generated 21.4 million tonnes of waste in 2023–24. Waste going to landfill has grown from 5.7 million tonnes in 2007 to approximately 7.3 million tonnes in 2022–23. This is not a public behaviour failure. It is a systemic failure of product design, industry regulation and government enforcement.

The Australian Academy of Technological Sciences and Engineering (ATSE) has set out a blueprint for a waste free future. It calls for products designed for long life, repair, reuse and remanufacture; strong extended producer responsibility (EPR) for packaging, electronics, textiles and other sectors; high quality sorting and recycling infrastructure; and support for composting and anaerobic digestion of organics.

The NSW Waste and Sustainable Materials Strategy 2041 commits to a circular economy and higher resource recovery. The barrier is not policy language, it is implementation. NSW law already requires **avoidance**, **reuse** and **recycling before disposal**, yet the State is fast tracking new landfill capacity.

Construction and demolition (C&D) waste is the largest single waste stream in NSW, more than 56% of total waste by tonnage. It sends approximately 2.4 million tonnes to landfill each year, even at an 80% recovery rate. Households are the smallest stream by tonnage, yet they are consistently blamed.

Plastics recycling sits at just 14%. Australia generated 3.2 million tonnes of plastic waste in 2023–24. The Australia Institute describes plastic recycling as inefficient, expensive and hazardous, and calls for a shift to reducing production and consumption rather than recovery alone.

Practical alternatives include:

Waste prevention and product redesign. Mandate design standards that eliminate problematic plastics and composites. Require durability and repairability. Embed producer take back schemes at end of life. A genuine, mandatory EPR system would make producers pay the true cost of waste and drive redesign away from non reusable, non compostable materials.

Reusable first approach to plastics. Reusable products consistently outperform single use plastics across nearly every environmental measure. A reusable cup reaches its environmental break even point after as few as 10 to 41 uses. Prioritise reusable systems in hospitality, retail and events. Reserve certified compostable products for applications where reusables are genuinely impractical.

Industrial hemp and safer construction materials. Construction and demolition (C&D) waste is the largest waste stream in NSW, at 57% of all waste generated in 2022–23. Even at an 80% recovery rate, C&D still sends approximately 2.4 million tonnes to landfill annually in NSW. C&D landfills are projected to be in deficit by 1.9 million tonnes per year by 2030. Scaling up hemp based construction materials; hempcrete, insulation and hemp boards, directly addresses this at source. These materials eliminate construction waste from the waste system entirely rather than diverting it. Hempcrete is carbon negative, fully biodegradable and compostable at end of life. A [2023 Curtin University peer reviewed study](#) found the carbon footprint of hemp based board was -2.302 kg CO₂ equivalent per m², meaning it absorbed more CO₂ across its life cycle than it emitted. Unlike concrete and masonry, hempcrete does not leach harmful chemicals during decomposition and produces no waste for landfill. The NSW DPI's [draft Hemp Industry Development Plan 2025](#) provides an existing policy foundation for scale up of hemp cultivation and processing across the State.

Universal FOGO. Implement food organics and garden organics collection and processing across all NSW households and businesses. NSW has legislated FOGO collection for all households by July 2030 and businesses from July 2026, backed by \$81 million in funding. Build sufficient composting and anaerobic digestion capacity. Treat organics as soil carbon and fertiliser, not as landfill.

Fix C&I and C&D waste streams. Recover the one million tonnes of recyclable materials in C&I landfill streams. The entire projected Sydney landfill shortfall of 1.1 million tonnes per year

could be eliminated simply by recovering recyclable C&I waste already going to landfill. Treat C&D as a circular materials flow, design for deconstruction, mandate materials recovery and ban easy disposal of reusable building materials.

Advanced sorting and mechanical biological treatment. Treat residual streams to recover remaining recyclables, stabilise organics, reduce methane and render the final fraction inert before secure landfill.

Residual waste research hubs. Co-locate research at major materials recovery and resource recovery facilities to analyse residuals and drive redesign and regulation upstream.

Ten year zero waste pathway eliminating 95 per cent of residual waste at source. Attached as a separate document: *Alternative Solutions to Avoid NSW's Waste*.

International zero waste cities and regions demonstrate that such systems can reduce residual waste by 90–95 per cent. Once achieved, the remaining small fraction can be managed through non incineration pre-treatment and secure landfill, without the need for large incinerators.

Key references (i)

[Rivas-Aybar, John & Biswas, Curtin University — Life Cycle Assessment of Hemp-Based Boards Produced in Western Australia, Materials, MDPI \(2023\)](#)

[NSW EPA — NSW Waste and Recycling Performance Data 2022–23, NSW EPA \(2023\)](#)

[NSW EPA — Construction and Demolition Waste Stream Audit, NSW EPA](#)

[NSW EPA — Sydney Landfill Shortage, NSW EPA \(2024\)](#)

[NSW DPI — Draft Hemp Industry Development Plan 2025, NSW Department of Primary Industries \(2025\)](#)

[Muhit et al. — Hempcrete as a Sustainable Substitute for Traditional Construction Materials, Buildings, MDPI \(2025\)](#)

[Rivas-Aybar, Biswas & John — Life Cycle Sustainability Assessment Framework for Hemp-Based Building Materials in Australia, Advanced Environmental Engineering Research \(2025\)](#)

11. (j) Other related matters

“Any other related matters.”

11.1 Climate policy and net zero

EfW incineration is not a climate solution. European data show typical incinerators emit around 540–580g CO₂e/kWh, exceeding gas and roughly double the current EU grid average. Approving high emission incinerators that require a steady stream of waste is directly inconsistent with NSW's net zero commitments. It risks locking in stranded assets for 30 to 40 years on a rapidly decarbonising grid.

Australia's emissions reporting for waste to energy incineration compounds this problem. Under the National Greenhouse and Energy Reporting (NGER) Scheme, only fossil derived CO₂, from plastics and synthetics is counted. Biogenic emissions from burning food scraps, wood and garden organics are excluded entirely, despite adding the same warming effect to the

atmosphere. Incinerators estimate their waste composition using periodic studies rather than real time measurement. There is no requirement for Continuous Emissions Monitoring Systems (CEMS) for CO₂. This means Australia's true climate impact from incineration is systematically underreported.

The ICJ's landmark 2025 advisory opinion has placed Australia under strict legal and moral obligation to measure, report and reduce all climate damaging emissions. Australia's continued underreporting of greenhouse gases from waste to energy incineration now exposes it to increased litigation risk, international criticism and loss of climate credibility.

The European Union has removed waste incineration from its sustainable financing taxonomy. It is also examining the inclusion of EfW incineration in emissions trading. Countries like England and the EU now mandate real time, continuous emissions monitoring and full carbon accounting for all facilities, regardless of size. Australia has not kept pace with global best practice, increasing its stranded asset and policy obsolescence risk.

Approving new incinerators in NSW while this reporting gap remains unresolved would embed high emission infrastructure into the energy system for decades and misrepresent the State's true climate performance. A genuine net zero pathway requires waste prevention and material recovery, not burning resources that could be retained in a circular economy.

Key references (j)

[Zero Waste Europe. *The Impact of Waste-to-Energy Incineration on Climate*. 2019](#)

[Zero Waste Europe. *Understanding the Carbon Impacts of Waste-to-Energy Incineration*. 2022](#)

[EU Taxonomy Regulation – Exclusion of Waste Incineration from Sustainable Finance, European Commission, 2022](#)

[DCCEEW. *National Greenhouse and Energy Reporting \(NGER\) Scheme – Solid Waste Calculator*. Australian Government](#)

[ICJ Advisory Opinion on States' Obligations to Address Climate Change, International Court of Justice, 2025](#)

[Climate Council. *World's Highest Court's Landmark Decision: Implications for Australia's Climate Obligations*, 2025](#)

[Australia Institute. *ICJ Ruling Confirms States Have a Legal Duty to Act on Climate — Australia Now Faces a Clear Choice*. 2025](#)

11.2 International conventions

Incineration is identified as a major source of persistent organic pollutants under the Stockholm Convention, a significant source of mercury under the Minamata Convention, and a generator of hazardous ash under the Basel Convention. Australia is a party to all three.

Approving new EfW incinerators that will produce POPs and mercury and generate POP contaminated ash is in direct contradiction with these obligations. IPEN has called for tighter Low POPs Content Levels for incinerator ashes and for an end to “*beneficial*” ash reuse that spreads POPs into the food chain.

11.3 Environmental justice

All major EfW incinerator proposals in NSW are targeted at regional communities: Parkes, Tarago (Woodlawn), Tomago etc.

Local Governments have expressed strong opposition. Richmond Valley has already fought to be removed from the EfW incineration precinct map.

11.4 ARENA and renewable energy claims

The Australian Renewable Energy Agency has provided support to waste to energy incineration projects, including an \$18 million grant to East Rockingham.

The European decision to exclude incineration from its sustainable finance framework underscores that mixed waste incineration is not renewable energy. Plastic rich residual waste is fossil fuels in another form. Burning it does not align with the intent of the Renewable Energy (Electricity) Act 2000, which excludes fossil fuel based sources.

Key references (j)

[WHO, *Dioxins and their Effects on Human Health*, fact sheet.](#)

[Richmond Valley Council, *Submission on EfW Precinct Mapping*, 2021.](#)

[NSW EPA, *Energy from Waste Infrastructure Plan*, 2021.](#)

[Basel Convention, *Technical Guidelines on POPs Wastes*. \[facebook\]](#)

[Clean Energy Wire, "EU climate ambitions spell trouble for electricity from burning waste", 2021](#)

[Zero Waste Europe, *The Impact of Waste to Energy Incineration on Climate*, 2019.](#)

[IPEN, *Comments on Low POPs Content Levels*, Basel COP-15, 2022.](#)

[ARENA, *Annual Report 2023–24*.](#)

[ARENA, "ARENA announces \\$18 million grant to East Rockingham Waste to Energy Project", 27 May 2020](#)

[NSW Opposition media release, "Incinerator Inquiry," 6 August 2025](#)

12. Conclusions and recommendations

The evidence presented in this submission shows that:

- EfW incineration is an old, high emission technology, not a clean or advanced solution.
- Health studies, including an Australian systematic review, link incinerators and their emissions with increased risks of cancer, adverse reproductive outcomes and cardiorespiratory disease.
- Ash and residues from incinerators contaminate soils, water and food chains and are recognised as hazardous under international conventions.
- Agriculture and regional economies face real risks from contamination and reputational damage.

- Genuine alternatives exist that align with a circular economy and net zero.

We recommend that the Committee:

1. Advise that the proposed EfW incinerators at Tarago (Woodlawn), Parkes and other regional locations should not proceed.
2. Recommend a moratorium on all incinerators in NSW. Industry should be made responsible for its own waste, including mandatory take back of products that cannot be recycled or composted at end of life. This will drive less waste at the design stage and ensure that any remaining waste is digitally tracked, retrieved by the producer and managed to a safe end of life.
3. Urge the NSW Government to focus its investment and regulatory effort on waste elimination and avoidance, reusable product design, safer materials (including industrial hemp), universal FOGO, and non incineration pre treatment and secure landfill for the declining residual fraction.

The Select Committee now has a clear chance to set a different direction for New South Wales.

Evidence from here and overseas proves that EfW incinerators are high emission and high risk. They do not fit with a genuine circular economy. They threaten air, water, soil and agriculture. They concentrate hazardous pollution in ash. They shift the burden of waste onto regional communities that have already said no.

By contrast, redesigning products, enforcing producer responsibility, improving sorting and organics recovery, and backing safer materials will cut waste at its source. These steps protect health, create jobs and support our climate and circular economy.

We ask the Committee to reject the Tarago, Parkes and other NSW incinerators. We also ask for a clear moratorium on incineration and a firm commitment to a waste avoidance, zero pollution future for NSW.