



## Residents Against the Richmond Valley Incinerator (RARVI)

Submission against Woodlawn ARC: SSD-21184278

December 2022

**Residents Against the Richmond Valley Incinerator (RARVI)** are a group of concerned Northern Rivers residents who are adamantly opposed to waste-to-energy incinerators being operated anywhere in NSW. We are dismayed that the New South Wales Government is encouraging proposals for waste-to-energy incinerators in this state.

### **The Veolia proposal at Tarago should not go ahead for many reasons:**

- 1. Toxic emissions would compromise the health of the local and wider community.** Veolia's incinerator will pump out dangerous air pollution 24 hours a day, every day for 30 years.<sup>1</sup>

Air pollution causes health problems even when it is below the safety standards<sup>2</sup> and the NSW Government doesn't even require safety standards for emissions during Other Than Normal Operating Conditions (OTNOC) such as during start-up, shut-down and regular maintenance events.<sup>3</sup> During these events the efficiency of filtering operations is compromised and emissions can soar.

Incinerator air pollutants can cause illness and death from respiratory problems (asthma, lung disease, breathing difficulties, strokes, cancer and heart attack).<sup>4 5</sup> A review of the health impacts of waste incineration was conducted in 2019 by the Australian National University Medical School, the Public Health Association of Australia, and the Council of Academic Public Health Institutions Australia. This study, published in 2020 in the Australian and New Zealand Journal of Public Health, and which was referenced by the Chief Scientist and Engineer in his report to the NSW Minister for Environment, concluded that "there is insufficient evidence to conclude that any incinerator is safe" and that "contamination of food and ingestion of pollutants is a significant risk pathway for both nearby and distant residents".<sup>6</sup>

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<sup>1</sup> Veolia Woodlawn ARC website; Tarago Community communications with Veolia, 2022.

<sup>2</sup> NSW Government Energy from Waste Infrastructure Plan 2021

<sup>3</sup> Energy from Waste, Report from the NSW Chief Scientist & Engineer, May 2020

<sup>4</sup> Facts about "waste-to-energy" incinerators, GAIA (Global Alliance for Incinerator Alternatives), 2018.

<sup>5</sup> Particle Pollution Exposure, United States Environmental Protection Agency, [www.epa.gov/pmcourse/particle-pollution-exposure](http://www.epa.gov/pmcourse/particle-pollution-exposure)

<sup>6</sup> The health Impacts of Waste Incineration: A systematic review, Tait et al, Australian and NZ Journal of Public Health, 2020.

**2. Incinerator emissions will contaminate locally grown food as well as ground and tank water over a wide area.**

Plume modelling demonstrates the potential reach of emissions.<sup>7</sup> They will spread from Canberra to Goulburn, Braidwood, Bungendore, Murrumbateman, Gunning, Marulan, Yass, and further. Veolia admits it will exceed the NSW Government safety standards for air emissions.<sup>8</sup> Toxic pollutants accumulate in the soil and water and are absorbed by plants, crops and animals.<sup>9</sup> Contamination of local farmlands puts produce, farm jobs, suppliers, local businesses, restaurants and all associated industries at risk.

Throughout its life the incinerator will produce over 380,000 tonnes of toxic hazardous fly ash and 1.9 million tonnes of contaminated bottom ash.<sup>10</sup> Hazardous waste will be stored in the ground near Tarago, risking contamination of groundwater supplies of the region, as well as the Sydney catchment.<sup>11</sup> Many agricultural industries are dependent on groundwater, which is very close to the surface in some locations. Contamination is not a risk that should be taken, there are no means of remediation.

**3. The economic impact over the area could be significant.**

Veolia's incinerator will only provide 40 full time jobs. Those jobs will require expertise unlikely to be held by locals. At the same time many jobs will be lost at landfill sites. *"Incinerating 10,000 tonnes of waste creates one job; land-filling 10,000 tonnes of waste creates six jobs; and recycling 10,000 tonnes of waste creates 36 jobs".*<sup>12</sup>

Veolia's proposal is already influencing real estate buyers.<sup>13</sup> Property devaluation would devastate the finances of residents in areas most affected – Tarago, Lake Bathurst, Currawang, Bungendore, Wamboin, Bywong, Sutton, Collector and Gundaroo.

The waste contracts entered into by local governments to guarantee enough municipal waste to supply an incinerator could burden the economy and, by extension, ratepayers. Local governments overseas have been bankrupted trying to fulfill waste contracts. Those contracts can also impact on recycling as there will no longer be an incentive to develop better methods.

**4. Waste to energy incinerators are inefficient and cannot be considered compatible with a circular economy striving to reduce waste and carbon emissions.**

The National Toxics Network recently commissioned a report by Eunomia Research and Consulting into a variety of strategies which demonstrated that properly managed landfills are a better option compared to waste incineration. Incineration destroys the resources, has higher greenhouse emissions than coal, causes pollution

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<sup>7</sup> Tarago Plume Plot, [www.plumeplotter.com/tarago/](http://www.plumeplotter.com/tarago/)

<sup>8</sup> NSW Department of Planning (Woodlawn ARC); Veolia Woodlawn ARC website; Tarago Community communications with Veolia, 2022

<sup>9</sup> The health impacts of waste incineration: a systematic review, Tait et al. Australian & NZ Journal of Public Health, 2020

<sup>10</sup> NSW Department of Planning (Woodlawn ARC); Veolia Woodlawn ARC website; Tarago Community communications with Veolia, 2022

<sup>11</sup> NSW Department of Planning (Woodlawn ARC); Veolia Woodlawn ARC website; Tarago Community communications with Veolia, 2022

<sup>12</sup> Environment Victoria (formerly the Conservation council of Victoria)

<sup>13</sup> NSW Department of Planning (Woodlawn ARC); Veolia Woodlawn ARC website; Tarago Community communications with Veolia, 2022

and encourages the production of more plastic. It is also a very inefficient way of producing energy. An incinerator burning 300,000 tonnes of waste will produce only 30MW of power while a coal plant with equivalent levels of pollution will produce over 800,000 MW.

Although the State Government asserts that incinerators can be integral to a circular economy, turning plastic waste into fuel perpetuates a fossil fuel dependency and a linear economy. Properly managed landfill that has undergone Advanced Material and Biological Treatment (MBT) does not leach toxins into the environment, emits less greenhouse gases, and is essentially carbon capture and storage. This waste treatment method is also scalable to accommodate local needs, cost competitive and climate-friendly. Buried, inert plastic waste is a potential future resource that could be mined to become part of a circular economy as recycling technology advances.

The NSW Government is committed to reach net zero emissions by 2030. This incinerator is incompatible with that legislated target as it would emit 140,000 tonnes of carbon dioxide per year.

#### **5. Veolia has no social licence for this enterprise and is not trustworthy.**

Social licence is the acceptance granted to a company by the community to operate. It is based on three components:<sup>14</sup>

Legitimacy – do they play by the rules?

Credibility – do they provide honest information?

Trust – can the community be confident that they will do what they say?

Veolia has consistently breached licence conditions for their current landfill operations at Tarago.<sup>15</sup> The company was fined for exposing workers to asbestos in Sydney.<sup>16</sup> After having assured the community there would be no odour, Veolia was fined \$8,000 by the EPA for the unbearable smell,<sup>17</sup> receiving 500 complaints in a single year.<sup>18</sup>

Veolia do not meet the criteria necessary for social licence, having a track record of breaking the rules, hiding information from the community and polluting the environment.

#### **6. The need for an incinerator has not been demonstrated.**

The existing Woodlawn landfill is estimated to have sufficient capacity for a further 25 years at current volumes. However, the NSW Government's circular economy policies will impact by reducing volumes of residual waste and therefore extend Woodlawn's life. In addition, the landfill site currently captures methane, which fuels electricity generation, a much more efficient process than incineration.

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<sup>14</sup> Ethics Explainer: social license to operate, The Ethics Centre, 2022

<sup>15</sup> EPA fines Veolia Environmental Services for waste offence, 23 July 2021, NSW EPA.

<sup>16</sup> \$590,000 financial undertaking secured after asbestos find, 7 October 2022, NSW EPA.

<sup>17</sup> Woodlawn Bioreactor fined \$8,000 for unbearable smell, 26 June 2015, NSW EPA.

<sup>18</sup> Correspondence from Hon. James Griffin MP (Minister for Environment and Heritage) to Hon. Wendy Tuckerman MP, Minister for Local Government and Member for Goulburn, MD22/2641, 4 July 2022.