

## **OBJECTION to the WtE INCINERATOR PROPOSED for TARAGO**

My name is [REDACTED]. I live in Sydney.

I have family members who live in the Tarago area. I am concerned for their health, their welfare, their environment and their community.

Having lived in the country and experienced the exploitation of small towns in order to satisfy the needs of government projects and the self-interest of private corporations, I **strongly object** to the proposed building of a Veolia waste-to-energy (WtE) incinerator at Tarago.

As you would expect, there are several reasons for my objection but, in this submission, I will only refer to four of them:

- whether a WtE incinerator is the best option ... or even an acceptable option
- whether a WtE incinerator should be located at Tarago – this point includes a list of people and organisations who object to WtE incineration
- the transparency of information
- health risks to local people and the environment

### **Are waste to energy incinerators an intelligent, or even acceptable, option ?**

A proposed WtE incinerator is being considered because it is seen as a convenient option and a “quick fix”, but ...

- is it the best option ?
- have alternative Australian innovations been considered ?

In Veolia’s EIS, WtE incineration is a “solution” that is being presented disguised as an environmental advance, with seemingly no acknowledgement of its limitations or the damage that it can do to people and the environment.

*The growing debate in Australia over which direction communities should take to deal with waste is at risk of being hijacked by the waste incinerator industry. For decades this industry was infamous as the highest known source of global dioxin pollution – one of the most toxic compounds ever studied. It was considered a dirty industry with a poor track record of air pollution and incidents. More recently the industry has rebranded itself to shake the ‘dioxin factory’ label and present itself as the ‘waste to energy’ solution which makes waste disappear and landfills obsolete while fighting climate change by generating ‘green power’. This report demonstrates that incinerators remain a dirty industry beleaguered with pollution problems.*

*Even the term ‘incinerator’ is rarely discussed in industry publications and proposals with the technology re-named as gasification, pyrolysis, plasma arc and mass combustion. However, all of these technology variants are defined as waste incineration by the US Environmental Protection Authority and The European Union.*

*“Burning waste for energy It doesn’t stack- up Exposing the push towards unsustainable waste to energy technology in Australia.”*

*August 2013 By Lee Bell and Jane Bremmer National Toxics Network Inc.*

Eight years later, Jane Bremmer's message still warns against incineration and WtE incineration.

This deliberate and willful misinformation campaign by Veolia must stop. Waste incineration has not been "globally proven as safe". In fact the most recent, global, independent, peer reviewed and published meta analysis and systemic review of the science on the health impacts of waste incineration undertaken by the Public Health Association of Australia states otherwise. This study concluded, "While the results were not consistent across the literature, based on a precautionary principle there is insufficient evidence to conclude that any incinerator is safe. There is some suggestion that newer incinerator technologies with robust maintenance schedules may be less harmful, but diseases from exposures tend to manifest only after many years of cumulative exposure, so it is premature to conclude that these newer technologies improve safety.

Incineration for waste management, including waste-to-energy options, is likely to remain an alternative that governments will consider. However, the financial and ecological costs of waste to energy are comparably high. Building reliance on a waste stream for energy counters the need to reduce waste overall. This review suggests that incineration is not without problems and so it is an option that needs to be pursued carefully with close monitoring. Local community groups have a basis for legitimate concern and so siting of incineration facilities needs to take these concerns into account. Early transparent consultation with communities about these facilities is essential." Its time for the media to expose this and for the federal and state governments to uphold our independent health experts ahead of paid industry lobbyists.

Jane Bremmer (Dec 2021)

Although some proponents describe it as "the latest", WtE incineration is now aging technology; the choice of this option reflects out-of-date, lazy, and potentially dangerous thinking.

Forward-thinking countries are now considering better ways to reduce, recycle and dispose of waste materials; everyone in Australia now be "thinking ahead". Considered planning for the future is what Australians expect of our political, scientific and industrial leaders !

Australia's abysmal performance dealing with "rubbish", swinging mostly between: burying, burning or offshoring, is a disgrace on our parliamentary representatives.

Matt Ford (1 Dec 2021)

"There is much that can be done right now given that scientifically-developed and proven methods are currently available through the green microfactory technology, yet the federal government is now also pushing on with an investment of \$200 million into so called 'waste to energy' projects that actually destroy forever waste materials that can be used over and over as a renewable resource."

Professor Veena Sahajwalla, *Director of UNSW's Centre for Sustainable Materials Research and Technology (SMaRT) Centre* (Oct, 2018)

<https://www.unsw.edu.au/news/2022/10/unsw-waste-pioneer-recognised-with-clunies-ross-innovation-award>

Why are we not investing more resources into developing environmentally friendly methods of reducing and recycling waste rather than building incinerators that will ultimately pollute the environment for many years to come ? Veolia and the NSW Government could take this opportunity at Woodlawn to create a more advanced, environmentally acceptable method of disposing of Sydney's waste.

Instead of allowing themselves to be wooed by corporations such as Veolia into accepting an “easy” solution, governments should do their utmost to find and develop safe, internationally acceptable methods of waste reduction. We are trying to expand Australia’s reputation of being a scientifically innovative country, well, here is a perfect example where we could prove our worth.

If this does not happen, I can just imagine the global reaction at the next international environment conference when the Australian representative stands up and proudly announces that we’re building more incinerators. We will be a laughing stock, derided by our peers ... and rightfully so !

Real solutions must focus on producing less waste, manufacturing less plastic, and using effective and proven methods of mechanical and organics recycling - not finding new ways to incinerate these materials. We need to move towards a truly circular, sustainable, just economy based on materials that don’t pollute, don’t contain toxic chemicals and don’t come from fossil fuels.

### Forward Thinking Strategies

Forward-thinking countries are now considering better ways to reduce and dispose of waste materials – we should be doing this too. This is what we expect of our political, scientific and industrial leaders !! We don’t want lazy thinking and a *“Well, other people do it, so we’ll do it too. We won’t even have to think about it”* approach.

“It is clear on this issue that people want action, and they want governments to invest and do something now,” Professor Sahajwalla said. “A number of councils and private business are interested in our technology but unless there are incentives in place, Australia will be slow to capitalise on the potential to lead the world in reforming our waste into something valuable and reusable.

UNSW (Sydney) Newsroom (Oct 2018)

- The first step would be to actively educate the public into the benefits of recycling and the dangers of NOT recycling. This should be a concerted campaign that is presented in both an entertaining and informative way. Whilst this campaign is in progress, people should be able to see obvious “recycling” actions by the government and industries so that the message is seen as an “all in” effort.

While ever people, and industries, are simply allowed to put all their rubbish into a bin and have it “disappear”, recycling will never be as successful as it easily could be. These bad habits are the antithesis of what the NSW Government hopes to achieve with circular recycling.

The positive reaction to Craig Reucassel’s landmark series, “War on Waste” shows that the Australian public are concerned about the environment and interested in recycling.

- Whilst sorting and recycling should be made as easy as possible for families, it should also be made as easy as possible for local councils to implement an effective recycling scheme. This does not always seem to be the case – many councils are left to struggle along by themselves.
- In cities where an emphasis has been placed recycling, the results have been very positive – in some instances, the waste stream has reduced to the point where incinerators need to try to find more waste from other places. *(You can easily find several examples of this on the computer; also mentioned further down in this submission.)* The implementation of the NSW Governments circular economy aims can achieve a similar result.

- Studies have shown that it is cheaper to recycle most waste products/materials than to extract materials from the ground and make the products in the first place.  
Products that have already been sorted by the user have greater economic benefit.
- We have a number of scientists and organizations who are working to develop products from recycled waste eg. Professor Veena Sahajwalla

UNSW's Veena Sahajwalla has received one of Australia's most prestigious research awards (Clunies Ross Innovation Award) for her globally recognised waste transformation technologies. (27 October, 2022)

<https://newsroom.unsw.edu.au/news/science-tech/unsw-waste-pioneer-recognised-clunies-ross-innovation-award>

Australians welcome these initiatives and are embracing products manufactured from recycled materials, so why isn't more investment being made into this work? I'm sure most people would prefer to see their taxes being used to encourage such Australian enterprise than being fed into multinational firms who pollute our environment then take profits overseas.

- When one does a computer search for "products from recycled waste materials", the results seem to go on for pages. As one example of a site, I will refer to the *World Wildlife Australia* site and I will list products that are featured on that site; I personally know of other Australian products, but I am highlighting this site because it is respected and you can check the products.

I am listing just fifteen products that use recyclable plastics + the business names + the recycled waste products; of course, there are many more products recycling many types of waste materials.

<https://www.wwf.org.au/news/blogs/17-cool-products-made-from-recycled-plastics>

- active wear (Amble Outdoors) – plastic water bottles
- shopping bags, totes etc (Get to the Shopper) – plastic
- planter pots (Upcycle Studios) – tyres
- dog products (Anipal) – ocean plastics + other environmental wastes
- mats and rugs (Recycled Mats) – polypropylene
- shoes (Allbirds) – sustainable wool + recycled plastic and cardboard
- yoga mats (Suga) – from recycled wetsuits ... so far 27,000
- Jenga game (JengaOcean) – each game made from 25 square feet of fishing nets
- swimwear (Batako) – weight of over 220,000 plastic bottles into swimwear
- blankets (Seljak) – textile waste wool
- recyclable waste bins (EcoBins) – plastics
- outdoor furniture, decking, fencing, signage, various construction and building products (Replas) – plastic
- backpacks (Onya Backpack) – plastic water bottles (each pack made from 10 plastic bottles)
- surfboard fins (Five Oceans) – 100 plastic bottle caps into one fin
- recyclable cups and bottles for events etc (Globelet) – plastics

As already mentioned, this is just a **TINY snippet** of products made from recycled waste ... and these are all Australian. We no doubt all know of many other items eg. toys for Christmas, plus we probably all remember the appeal for bottle caps for the production of prosthetics, also the best travel jacket that I've ever owned (bought in early 1970s) was made from recycled plastic/PVC bottles, etc.

Why is Australia not embracing and promoting this opportunity to turn **waste into wealth** AND to help save our environment at the same time? This is surely what most Australians would want. If more Australians understood the “solution” being proposed by their elected leaders and the profit-oriented overseas polluting firms, then the people supporting options such as a waste to energy incinerator would stand condemned.

The general indignation would be increased many times over if the population realised the amount of our taxes that are paid to the overseas polluting giants in the form of grants, credits and other financial support.

### Global trend

Some European countries have found WtE incinerators not to be economically sustainable and so are phasing them out. They also do not meet environmental standards espoused by the EU. USA authorities are also withdrawing support.

*For years, European countries have built “waste-to-energy” incinerators, saying new technology minimized pollution and boosted energy production. But with increasing concern about the plants’ CO2 emissions, the EU is now withdrawing support for these trash-burning facilities.*

*BETH GARDINER • APRIL 1, 2021  
Yale Environment 360 Published at the Yale School of the Environment*

Even while China is building new incinerators as a desperate way to deal with their overwhelming waste problem, they are also working to develop various environmentally friendly methods to reduce rubbish. I don’t think that many Australians would like to read that China is making more efforts to improve their “rubbish problem” than we are.

- In the short term, the results show that several provinces, including Anhui, Tianjin and Zhejiang risk overinvestment in new incineration capacity because planned capacity for dealing with mixed waste exceeds the projected quantities.
- These findings are true even without sorting of food waste or an increased focus on removing recyclable waste from the mixed waste stream. If the success of the waste-sorting scheme in Shanghai, which started last year, is replicable in other cities then several provinces could see reductions in mixed municipal solid waste as soon as this year.

**China Dialogue** by Sara Shapiro-Bengtson (August 12, 2020)  
*Sara Shapiro-Bengtson is pursuing a PhD at the Technical University of Denmark. Her PhD project is part of the Sino-Danish University Cooperation and focuses on efficient utilisation of Chinese biomass resources in the energy sector.*

**There is no doubt that, given the political will, we can do much better than we currently are.**

### “Green” Energy and funding

Veolia’s EIS presents the production of power as a benefit of the WtE incinerator - in reality, statistics demonstrate that this benefit is small, especially when counterbalanced against energy that the overall plant will require to operate.

State and Federal governments have introduced various schemes involving subsidies and tax breaks for renewable energy generators in an attempt to grow the renewable energy sector and thereby meet national greenhouse gas abatement targets under our international agreements.

“The incinerator industry is now compelled to make claims that the electricity it produces is renewable and green to attract subsidies and credits for ‘green’ energy. Regulators and legislators are taking a closer look at these claims in some countries and exposing the false nature of these arguments.”

The below screen prints are from a meeting held on 9<sup>th</sup> May 2022. They show how reliant waste-burning industries are on government financial support.

[https://www.randwick.nsw.gov.au/\\_data/assets/pdf\\_file/0010/343495/Matraville-Precinct-Minutes-9-May-2022.pdf](https://www.randwick.nsw.gov.au/_data/assets/pdf_file/0010/343495/Matraville-Precinct-Minutes-9-May-2022.pdf)  
(Mr Matt Thistlewaite – member for Kingsford-Smith)

Matraville Precinct - Minutes of General Meeting 9 May 2022, 7pm, Zoom meeting

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| 8. Update on the Campaign against Opal and Suez Incinerator | <p>Matt Thistlethwaite:</p> <p>Matt gave an update on the changes proposed to the Federal Recycling and Waste Reduction Bill to allow carbon credits to be issued for WtE incinerators burning process engineered fuel (PEF) and how this could affect current incinerator proposals. He confirmed that renewable energy grants have been provided for WtE programs that involved incineration. Chris Bowen, Shadow Minister for the Environment has announced that, if elected, Labor would review that with a view to ending any commonwealth funds that involve incineration, due to the impact on local communities. There is evidence that internationally, we are moving away from those types of projects, that are no longer seen as clean energy projects as they can create more harm than good, they don't reduce emissions but actually create more. The subsidies would be reviewed with a view they only go to clean energy projects that benefit the community.</p> |
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|  | <ul style="list-style-type: none"> <li>Jane Bremmer from the National Toxics Network (NTN) met with Chris Bowen (shadow minister for the environment) at a climate roundtable in Perth where Chris agreed that if elected, Labour would review the grants and subsidies provided for waste incineration projects and ensure they are provided only for new, renewable energy technology.</li> </ul> <p>This is really important news because the removal of these subsidies will make burning waste unprofitable.</p> |
|  | <p>Chris Bowen also accepted a report from NTN that shows that burning waste creates worst impacts than just land filling it (see NMI's recent FB post). Chris says that he will take the report's findings on board and will be using it to inform future policy.</p>  |

Veolia is not hoping to build a WtE incinerator at Tarago for the good of NSW, they obviously see it as a profitable venture. I am wondering:

- with whom are Veolia signing a contract
- for what amounts
- how long is the contract
- what happens if NSW defaults ... possibly on supply of waste *(this has happened in other countries)*

**Whatever green-washing euphemism the industry is using - be it “waste to energy,” “chemical recycling,” or something else - waste incineration is a short-term, false solution.**

## A WtE incinerator for Tarago ??

Until a few years ago, Australia was sending waste material to other poorer countries – these countries are now refusing to be exploited and refusing accept our rubbish.

Now our governments are hoping to inflict the burden on some of our own less powerful communities. How unjust ! How un-Australian ! Just a little more caring and forward planning by our elected political leaders would allow us to adopt far more judicious and superior methods of dealing with waste.

Cate Faehrmann (NSW MLC) recently summed up the situation:

This [withdrawal of wte incinerator proposals] will bring some relief to community groups in Sydney who have been campaigning against the construction of these toxic incinerators in their communities for years. **Unfortunately though, the Government is now expecting a handful of regional communities to bear the brunt of the growing waste problem in NSW."**

### **The Veolia WtE incinerator overwhelmingly opposed by local communities around Tarago.**

Below is a list of some of the people who have spoken out against the proposed Tarago incinerator and/or offered support to Tarago: *(\*\*\* see the bottom of this page to read more detail about these objections)*

- The WtE incinerator is opposed by local communities around Tarago. The people have spent years fighting to protect their community and keep it safe.
- Resignation letter from the last three Community Representatives on Veolia's Community Liaison Committee
- Two local councils are against the building of the waste-to-energy incinerator at Tarago
- Politicians (state and federal) have criticized the waste-to-energy incinerator at Tarago
- City of Sydney have banned waste-to-energy incinerators from their precincts
- ACT has banned the building of waste-to-energy incinerator within its boundaries
- Two areas of Sydney (Matraville and Eastern Creek area) have had waste-to-energy incinerator proposals withdrawn because of the many community objections
- NSW Environmental Protection Authority put in a submission **against** the Eastern Creek WtE incinerator proposal because it was concerned about health and environmental impacts

The above list shows that, **not only does the Tarago community (and surrounds) not want a waste to energy incinerator in its area, neither do Sydney or ACT. Even the NSW EPA spoke against it.**

Everyone recognises the risks that can come with such a venture – nobody wants to have to bear those risks.

Having said this, note the following 2021 statement from NSW EPA ... that community acceptance is to be expected for projects such as a WtE incinerator.

Energy from waste can be a valid pathway for residual waste where:

- **community acceptance to operate such a process has been obtained.**

NSW EPA **NSW Energy from Waste Policy Statement** (2021):

**I cannot understand why the proposal for a WtE incinerator at Tarago is still being pursued - the proposal obviously does NOT have community acceptance and it is unlikely to achieve it in the future.**

If the current proposal goes ahead, *which, of course, it should not do for many reasons*, those who approve it will be imposing a polluting (possibly dangerous) incinerator on a small, agricultural country town and surrounding areas. The town does not want the incinerator and has spent a HUGE amount of time and effort finding out about it and then, after realising the MANY negative impacts that it would probably have on their lives and livelihoods, fighting against it.

The waste that would be transported in to the incinerator is not waste from the town, it comes from Sydney – if it is Sydney’s waste then let Sydney deal with it. It is parts of Sydney who have managed to dodge the bullet because of the large numbers who could put up resistance. To now inflict this incinerator on a small, peaceful town would be shameful !

\*\*\* Below is more detail about above people and organisations who have objected to the building of a WtE incinerators, especially at Tarago.

- The WtE incinerator is opposed by local communities around Tarago. The people have spent years fighting to protect their community and keep it safe.
- Researching through various documents, I was interested to read an open letter from former community members of the VCLC dated 3<sup>rd</sup> November, 2022. The letter refers states that there is no need for a WtE incinerator at Tarago.

We ... being the last three Community Representatives on Veolia’s Community Liaison Committee .. resigned ... in response to Veolia’s insistence in pursuing to build and operate a waste incinerator within the Woodlawn Eco Precinct, Tarago, NSW.

We have resigned because there is no justifiable need to build and operate a waste incinerator at Tarago ...”

- The Goulburn Mulwaree Council has opposed the building of WtE incineration facilities in the LGA, including at Tarago; this resolution was made in Sept 2021 and reaffirmed in March 2022.

Also

Last month’s business paper said the Goulburn Mulwaree Council indicated that the emission plumes from a waste incinerator site in Tarago will impact the Yass Valley communities of Sutton, Gundaroo and residents residing to the east of Yass’ LGA.

- Yass Valley Council opposes the WtE incinerator

Yass Valley Council also stated their total opposition to waste incineration facilities in the Yass Valley LGA and neighbouring LGAs in a recent Council Meeting. They said Council’s position is to ensure that environmental and public health outcomes are the number one priority.

Yass Valley Council is formally against the proposed waste to energy plant in Tarago, a township about 120 kilometres from Yass but much closer as the crow flies and the potential smell travels.



Yass Valley Council's formal resolution –

Council states its total opposition to waste incineration facilities in the Yass Valley Local Government Area and neighbouring Local Government Areas. Council's position is to ensure that environmental and public health outcomes are the number one priority.

The State Government be requested to undertake an urgent review of the Energy from Waste Infrastructure Plan before any applications for specific Energy from Waste proposals are lodged or determined based on:

- A robust evaluation of the technology used in any existing facilities in addressing any adverse impacts (especially emissions).
- A cost benefit analysis of the best technology facility in comparison to other energy generating alternatives.
- Identifying potential sites and evaluating their suitability based on the preferred technology.
- Use of an Environmental Impact Assessment process to evaluate specific proposals and a merits-based review process for those aggrieved by the assessment outcomes.

The Minister for Environment and Local Member for Goulburn be advised of Council's determination.

- Politician - Wendy Tuckerman (MLA) - presented a petition to the NSW Legislative Assembly on behalf of people opposing a WtE incinerator at Tarago  
<https://www.parliament.nsw.gov.au/la/papers/Pages/abled-paper-details.aspx?pk=82083>

also

On Saturday, November 6 CATTI (Communities Against The Tarago Incinerator) hosted a meeting with concerned residents, councillors and Goulburn MP Wendy Tuckerman to discuss the waste incinerator proposal.

Wendy said on Saturday morning in Tarago she heard lots of questions about her stance on Waste to Energy and the Tarago Incinerator.

"Let it be known and clear: I do not want an incinerator anywhere in the Goulburn electorate," she said. "We will fight this."

Last month's business paper said the Goulburn Mulwaree Council indicated that the emission plumes from a waste incinerator site in Tarago will impact the Yass Valley communities of Sutton, Gundaroo and residents residing to the east of Yass' LGA.

The Tarago facility has been identified with other sites including the Parkes Special Activation Precinct, West Lithgow Precinct and the Richmond Valley Regional Jobs Precinct.

General Manager Chris Berry said Council is supporting Goulburn Mulwaree Council in taking a stand against the proposed waste to energy plant in Tarago.

- Politician - Jo Clay MLA - Member for Ginninderra (Canberra – just across the border)  
Ms Clay lodged an objection and sponsored a petition.

I've just lodged an objection for to Veolia's proposed incinerator for Tarago. I sponsored an Assembly petition earlier this year objecting to the facility which attracted 919 signatures. A lot of people are very worried about the impact this facility could have on our air, our water, our health and our regional food and wine growers.

I spoke about this facility in the Assembly yesterday. I'm objecting on behalf of the ACT Greens. The ACT Government is also lodging a submission.

The NSW Government is accepting submissions until 6 December. There's some guidance on how to submit from Communities Against The Tarago Incinerator here:  
<https://www.notaragoincinerator.com/>

If you'd like to comment, it's really important to say what you think in your own words. But if you'd like to see what I said, read on.

"I write to lodge an objection to Veolia's proposed incinerator for Tarago. I live in the ACT and am the local member for Ginninderra. I lodge this objection personally and on behalf of the ACT Greens. Please do not allow this facility to be built in our region.

The ACT Greens have long opposed thermal incineration. It is too risky for health and the environment. Incinerators have a long history of polluting our air and water. Testing is always a concern. Burning waste is also a waste of resources. It is also an unnecessary way to generate electricity. The ACT is powered by 100% renewable electricity, primarily sourced from solar and wind. We do not need incineration.

The ACT Government banned incinerators in the ACT in 2020. The ACT Government has committed to introduce the human right to a healthy environment. We would not allow this facility within our borders. We do not want to see one just across our border.

I am concerned for the residents of Tarago and Canberra and for future generations. This facility might impact on the clean air and water in our region. It might also impact on our regional food growers, winemakers and other primary producers.

I sponsored a community petition opposing this proposal. 919 Canberra residents signed it. It is attached to this letter. Residents in Tarago are even more concerned.

Communities Against the Tarago Incinerator demonstrate predicted air pollution on their website using modelling developed by the US EPA. This predicts pollution from the incinerator could reach Canberra, Queanbeyan, Yass and the whole region.

I released the ACT Greens' Vision for a Circular Economy in August 2022. The ACT Government is now consulting on a Circular Economy. A genuine Circular Economy means we should think about what we need and come up with a sustainable way of meeting those needs. Incineration is not part of that story. Can I discuss this with you as a better alternative to incineration?"

[350.org](https://350.org) Canberra Conservation Council ACT Region

- Politician - Senator Deborah O'Neill - a senator in the Australian Federal Government spoke negatively against the proposed Tarago waste incinerator:

*Below are parts of an article in ABOUT REGIONAL - 1 December 2021 | Max O'Driscoll*

Duty Senator for Hume Deborah O'Neill has called out the would-be constructors and operators of the facility, Veolia, and pressured Federal Member for Hume Angus Taylor to support his constituents and publicly oppose the project. She said that she wished the Tarago community had a local member who stood up for them.

*(Mr Taylor has not recently made public comments on the waste-to-energy project. Privately, he has pointed to the matter as a NSW Government issue and not one he'd like to get involved in.)*

Presenting to the Senate on Wednesday, 24 November, Senator O'Neill declared she is supporting the local community, which does not want to see the "toxic project" go ahead. She used examples of prior failings in Tarago as an example of why the project would be a "disaster for the local community".

"[The site of the proposed project] is only 5km away from Tarago Public School, a school which is already suffering from an epidemic of lead pollution and contaminated drinking water," she said.

"Currently in that town, there is no reticulated water and all water is collected from rainwater. Could you imagine the effects on water of a waste incinerator belching fumes into the air in the drinking water of that community?"

Referring to Veolia, Senator O'Neill commented that the organisation demonstrated appalling corporate citizenship. She continued on to say that they are not dealing in good faith with the community and that they are imposing their will without adequate protection for the health of the community.

- Other Sydney areas have also objected to having incinerators built eg Matraville (Eastern Suburbs) (see below) and Eastern Creek (Minchinbury).

The community is celebrating after the controversial proposal for an incinerator in Matraville has been officially withdrawn last week. The proposal's status on the NSW Planning portal has been changed to withdrawn after new environmental protection guidelines were introduced, prohibiting waste company Veolia from going ahead with plans.

*City Hub posted 5.9.22*

- The NSW Environmental Protection Authority  
In 2017, the EPA condemned the safety of a WtE incinerator proposed for Minchinbury area ie. the Eastern Creek WtE proposal. The proposal for this incinerator was withdrawn.

The EPA has put in a submission against the \$500-million waste-to-energy facility touted for the corner of the M4 and M7 motorways at Eastern Creek.

**The EPA said it could not support the plan due to concerns about the proposal's potential air quality impacts, human health impacts and alignment with the NSW EPA's energy-from-waste policy.**

<https://www.abc.net.au/news/2017-03-30/epa-opposes-western-sydney-incinerator-on-health-air-quality/8400076>

- On 2<sup>nd</sup> July, 2020, the City of Sydney passed a Resolution of Council including the following points:
  - (v) there are now four major proposals for waste incinerators planned for the Greater Sydney area - Lithgow, Matraville, Blacktown and Eastern Creek. While these incinerators in the Sydney Local Government Area, they pose a significant potential risk to residents nearby and to air quality in the Sydney Basin;
  - (vi) incinerators release many air pollutants, including nitrogen oxides, sulfur [sic] dioxides, particulate matter, lead, mercury, dioxins and furans. These substances are known to have serious public health effects, from increased cancer risk to respiratory illness, cardiac disease and reproductive, developmental and neurological problems. According to recent figures from the waste industry, incinerator plants emit more sulfur dioxide, nitrogen oxides and carbon dioxide per unit of electricity generated than power plants burning natural gas; ...
- ACT - Thermal treatment of waste (including incineration, gasification and pyrolysis) is not permitted in the ACT. They were banned for health and environmental reasons.

Cate Faehrmann (NSW MLC) recently summed up the situation:

This [wte incinerator proposals withdrawn] will bring some relief to community groups in Sydney who have been campaigning against the construction of these toxic incinerators in their communities for years. **Unfortunately though, the Government is now expecting a handful of regional communities to bear the brunt of the growing waste problem in NSW."**

## A need for caution

### Nimbies - lack of open discussion

I have read that citizens objecting to the proposed WTE incinerator have been referred to as "nimbies". In this case, that'd exactly what they need to be ! Community residents and the local council are fighting to protect their lives, their livelihoods and their environment.

The commercial enterprise proposing the WtE incinerator development is the huge multinational corporation, Veolia; the proposal is being presented after consultation with the NSW Government - both these agencies would consider the building of the proposed incinerator beneficial ie. Veolia would welcome the extra corporate influence and the profits while the NSW Government would no doubt see the incinerator as an expedient way to dispose of rubbish and earn environmental "green points".

NSW Government - NSW Minister for Energy and the Environment, Matt Kean, spoke about supporting investment in NSW while also **respecting the concerns of local communities** (*Renew Economy* 10.9.2022) – admittedly I am not "a local", but I have not read anything from Minister Kean suggesting that he is concerned about the local community around Tarago. In a recent 2GB radio interview about an energy issue, Mr Kean avoided answering questions with replies such as, "We've got a plan .." and "We've got good policy". People want more than such evasive platitudes ! Whilst we understand that politicians sometimes need to maintain a neutral stance in scenarios

where decisions are pending, citizens should expect that their politicians are prepared to engage in active, honest discussions – this is why they were elected ie. to represent the wishes and interests of those who elected them.

### How trustworthy is Veolia ?

I would like to think that Veolia can be trusted but, as I have learnt over the years, the claims of large enterprises, especially those trying to win a contract, often need to be treated with caution. Companies will often tell you just what they want you to know, and it is up to other interested parties to find out further information, or recognise problems, for themselves.

Veolia implies that it is a good corporate citizen and that it can be trusted to work with the community ... however, perhaps the openness of Veolia's communication could improve.

Here are three examples of concerns that, I feel, were not addressed openly :

- for many years, locals have needed to complain about the foul smell regularly emanating from the Woodlawn bio-reactor and spreading for several kilometres; the Veolia EIS states that there were 98 complaints between 1.4.2020 and 31.4 2021.  
The Veolia EIS also states, *"There would be no expected increase in odour emissions from the Bioreactor or MBT facility due to the ARC."* There is, however, no statement from Veolia about improving the current bad odours. Where is Veolia's concern about solving this ongoing problem ?
- road safety, an increase of traffic and damage to roads is a real concern but the community have not been given any satisfactory explanations as to future plans. This sounds like a question that could be fairly easily answered.
- Over some years, Veolia (previously named Vivendi + other linked firms) has been fined internationally for various industrial and environmental breaches eg. recent asbestos scattered at the Horsley Park site ... which is now shut down. A recent breach in the Tarago is the water pollution at their Crisps Creek Intermodal Facility + an official caution by Goulburn Mulwaree LGA(2022) for the misuse of material classified as ENM.

This third point raises two issues :

- #1 - the dubious safety / procedural records of Veolia
- #2 - Veolia claims "transparency" yet their various offences are not easy for the average person to track down – I know because I've spent a deal of time doing it. Their website only promotes the "positive".

Veolia says that it listens to the community – perhaps this is so, but does Veolia then do anything to resolve the community's ongoing concerns ? Their track record on the above few important points is not good and, of course, there are many more.

Since the current proposal is for a project that will last for decades and which could cause damage to people's health, the environment and the local economy, I believe that extreme scepticism is warranted.

## **Health Concerns and Check the Information**

The below “Dorothy Dixier” and the reply from Veolia is frightening. It reflects the “to the best of our current knowledge” attitude that Veolia adopts in responses to health concerns raised in the EIS. This is effectually an escape clause for when things go wrong.

Underneath the below (brown) passage, I have added what I see as the true meaning of what Veolia has written.

### **Is the rainwater in my tank safe ?**

Generally yes. There is currently no evidence that the Woodlawn bioreactor landfill presents a risk to the quality of rainwater in rainwater tanks.

A properly maintained rainwater tank can provide good quality drinking water. Providing the rainwater is clear, has little taste or smell and is from a well-maintained water catchment system it is probably safe and unlikely to cause any illness for most users. People who use rainwater for drinking and cooking should always be aware of potential risks associated with microbiological and chemical contamination, regardless of where they live in NSW.

The EPA does not test the quality of rainwater in private rainwater tanks. If you wish to have some water tested your local NSW Health Public Health Unit can help you find a NATA accredited laboratory.

Further information on rainwater tanks is available from NSW Health.

Below are my interpretations :

### **Is the rainwater in my tank safe ?**

Generally yes. = probably

There is currently no evidence = but there might be some in the future (please see below \*)

A properly maintained rainwater tank can provide good quality drinking water. = the responsibility is yours

Providing the rainwater is clear, has little taste or smell and is from a well-maintained water catchment system = it's your job to keep an eye on the water quality and your water catchment system had better be a good one that would pass legal scrutiny

it is probably safe and unlikely to cause any illness = you'll probably not get sick

for most users . = but if you do, you'll be classed as an exception for whom we probably cannot be reasonably held responsible

People who use rainwater for drinking and cooking should always be aware of potential risks associated with microbiological and chemical contamination, regardless of where they live in NSW. = everyone in NSW needs to be careful, even if s/he hasn't had an incinerator built a few kilometres away

The EPA does not test the quality of rainwater in private rainwater tanks. If you wish to have some water tested your local NSW Health Public Health Unit can help you find a NATA accredited laboratory. = The official authority deemed responsible for making sure that we meet the compulsory safe guidelines won't help you by testing the water that your family will be drinking. If you want your water tested, you'll need to organise and pay for this yourself, but it must be done at a NATA accredited lab.

Further information on rainwater tanks is available from NSW Health. = want more help ? Here's where you can look it up for yourself.

My comments may seem trite but they are not meant as such - just ask ...

- victims of the tobacco companies who continued to claim that smoking was safe even though the companies knew otherwise  
<https://www.healio.com/news/hematology-oncology/20120325/cigarettes-were-once-physician-tested-approved>
- James Hardie workers suffering from mesothelioma and similar diseases; also people coming into contact with asbestos, including ordinary people doing renovations. James Hardie set up an inadequate compensation fund and relocated to the Netherlands.  
<https://www.australianasbestosnetwork.org.au/asbestos-history/battles-2/battling-james-hardie/>
- Silicosis victims – usually people working with engineered stone who were unaware of the risks. Curtin University is predicting 103,000 cases.

These are just three illnesses where officials knew of a problem but turned a blind eye, perhaps for convenience, for profit or to avoid liability.

Also remember lead poisoning and PFAS pollution caused by fire-fighting foam.

I'm also adding just a couple of large international enterprises now infamous for their abuse of power and taking advantage of "weaker" groups of people ie. Santos and Rio Tinto.

**The message: people need to be cautious BEFORE any harm is done.** People need to look after themselves and their families first. As far as health is concerned, we only have one body and one life. Much though we might like to do so, we can't simply trust large organisations without assessing their integrity and the truth of what they say, or seem to be saying – unfortunately, sometimes this is very difficult to do.

There is one important difference between victims of the above illnesses and people currently living in Tarago and surrounding areas – the difference is that Tarago-Goulburn-Canberra residents are aware of the possible dangers of having a WtE incinerator built in the area where they live; the residents are currently as healthy as any similar community and they are not prepared to be afflicted by health risks that are already being assessed by global health authorities.

Veolia acknowledges some possible dangers of the WtE incinerator but claims that **they are below the levels recognised as "safe"** by environmental authorities !!?

Who is certain that these levels truly are safe AND how accurate is the measuring procedure ?  
Who sets the arbitrary levels and what are the criteria used to determine if something is safe or dangerous?

What right does an overseas business have to impose such potentially dangerous risks upon already established communities, just for the sake of its own financial gain ?

What government or authority would allow such greedy irresponsibility ?

Consider the following case : I have already mentioned that there were 98 recorded complaints in one year about bad odours emanating from the Woodland bio-reactor. While some people will say that bad odours don't cause serious illness, this attitude ignores the stress of the situation, that some people can feel nauseous, and that people may need to change their lifestyles and stay inside a closed up house. *(I will quickly mention here that, in the EIS, Veolia state that the "instrument" used for measuring bad smells is the human nose !)*

Last year, listeners contacted Ben Fordham, an announcer on the Sydney radio station, 2GB. These people had been trying for a long time to get some sort of resolution to the problem of a strong odour coming from a Sydney landfill – they had simply been passed from one organisation to another. The radio publicity and intervention of Ben Fordham did bring about some improvement, though I think more work was still needed on the problem. During the course of this investigation, I remember people talking to (or about) the EPA. I was surprised to hear that the EPA wasn't able to simply walk onto the site and command that the problem be solved ... this is the impression that we are so often given.



The below 2GB article is just one of many – you can check them for yourself.

### EPA under fire for 'ridiculous solution' to Western Sydney's big stink

12/05/2021 BEN FORDHAM EDMOND ATALLAEPAMINCHINBURY

#### **The Environmental Protection Authority is under fire for its slow response to Western Sydney's stench.**

Ben Fordham was contacted by residents in Minchinbury and surrounding suburbs who claimed the smell emitting from waste facilities in residential areas is unbearable.

The EPA had issued Bingo landfill facility with a legal notice but the odour remains.

Bingo has now been tasked with placing a layer of topsoil to stop the smell.

Member for Mount Druitt, Edmond Atalla, is moving a motion to shut Bingo down until the smell is gone.

He told Ben Fordham the EPA is "not taking this seriously".

"The EPA has not taken any harsh action.

"EPA has put a condition on them to stop taking smelly bins in. How the hell are you going to monitor that?

"Are they gonna employ a human sniffer?"

In the EIS, I believe that Veolia refer to the EPA as setting performance and safety guidelines that Veolia will be required to meet. The EPA is presented as an authority that will make sure that all regulations are followed and that everyone is safe. Unfortunately, this is not always what eventuates and too often irreparable is done before any danger is recognized.

While I am not questioning the integrity of the EPA, it should be remembered that large international companies, such as Veolia, also wield a lot of power. Established enterprises are also often granted significant powers for self-regulation and self-reporting - after all, official "watchdogs" can't be on site all the time.

Those affected by the proposed Tarago WtE incinerator should not simply presume that other people are representing their best interests.

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## Air quality

There are several health issues to be discussed but I am only going to refer to the inhalation, and other exposure, to pollutants from WtE incinerator smoke stack emissions.

Since any WtE incinerator stack would be emitting particulate matter, various chemicals and poisons into the Tarago community (and surrounds), it is vital that there is an accurate assessment of emissions and also a consideration of the risks posed to health and the environment.

At the moment, since any Tarago WtE incinerator is merely a proposal, it is impossible for accurate measurements to be recorded. To “solve” this problem, Veolia took a series of current ambient air readings from around the Tarago area; they also considered readings from their Staffordshire ERF. It was on the basis of these rather irrelevant readings that Veolia felt able to **predict** that emissions from a WtE incinerator would not pose health risks to the affected communities !?

Stack emissions will contain small particles known as particulates – if inhaled, small particulates (PM2.5) can reach the bottom of people’s lungs and cause various health problems. This is not disputed.

Using the above-mentioned measurements, Veolia **predicted** their unsurprising conclusion ie. *“With the assessment of PM2.5 based on **size**, not on composition, it was decided that any likely increase in PM2.5 levels would have negligible health effects on the community.”*

Veolia, however, also needed to evaluate the **chemical composition** of matter and gases that might be inhaled ie. nitrogen dioxide, sulfur dioxide, carbon monoxide, gases (hydrogen chloride, hydrogen fluoride, ammonia and volatile organic compounds as benzene), metals, polycyclic aromatic hydrocarbons (PAHs), dioxins and furans, and dioxin-like polychlorinated biphenyls (PCBs). Some of these chemicals are potentially very dangerous but, once again, there are no predicted health risks to community members.

As well as considering the above **inhalation risks** of particulates and chemicals, Veolia also considered **other pathways of exposure** eg. metals and persistent organic pollutants that

- could be deposited on the ground from where there could be uptake of these chemicals into produce including fruit and vegetables, eggs, fish, milk and meat
- could settle on roofs from where it could be washed into water tanks used by the family
- could come into contact with people’s skin and then be absorbed into the body

Veolia’s overall **predicted** conclusion is **“All risks to human health are considered negligible for the duration of the Project.”**

**\*\* Whilst this predicted conclusion sounds positive, it has no solid basis - the measurements used to calculate any health risk are merely speculation. Under no circumstances should they be used to justify the building of a WtE incinerator.**

I also notice the repetition of the phrase “for the duration of the Project” - what happens if people living under the emissions from a WtE incinerator for 10-20 years do suffer health problems as a result of the pollution but these problems are not diagnosed until after the completion of the project. Would these victims be supported or abandoned?

Would there be a need to launch legal action against the organisations who promoted the building of the incinerator.

This is a frightening possibility for all those concerned but it is a situation that is becoming all too common.

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I will close this submission by again quoting a comment by Jane Bremmer, an Australian who has a strong technical background in the chemicals and waste nexus, and who works towards a “Toxics Free Future” at local, state and international levels.

This deliberate and wilful misinformation campaign by Veolia must stop. Waste incineration has not been “globally proven as safe”. In fact the most recent, global, independent, peer reviewed and published meta analysis and systemic review of the science on the health impacts of waste incineration undertaken by the Public Health Association of Australia states otherwise. This study concluded, “While the results were not consistent across the literature, based on a precautionary principle there is insufficient evidence to conclude that any incinerator is safe. There is some suggestion that newer incinerator technologies with robust maintenance schedules may be less harmful, but diseases from exposures tend to manifest only after many years of cumulative exposure, so it is premature to conclude that these newer technologies improve safety.

Jane Bremmer (Dec 2021)

For more information about jane Bremmer, please see <https://zerowasteaustralia.org/about/>