



Peoples Climate Action Coalition

PO Box 544,
Canberra ACT 2601

Director – Industry Assessments
Development Assessment
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124
Industry.Assessments@planning.nsw.gov.au

Objection to Application No SSD-21184278 for the construction and operation of the Woodlawn Advanced Energy Recovery Centre near Tarago, NSW.

The Peoples Climate Action Coalition T/A the Peoples Climate Assembly (PCA) (<https://www.peoplesclimateassembly.org>) is a coalition of climate action groups in the Australian Capital Territory working together to encourage the Australian government to take real, meaningful and urgent action to address the climate and ecological crisis.

The PCA wishes to lodge a formal objection to Veolia's proposal to build a waste-to-energy (WTE) incinerator near Tarago, approximately 40 kms from Canberra.

The PCA joins the local community of Tarago and groups like the Communities Against The Tarago Incinerator (CATTI), in opposing the proposal. Furthermore, the PCA notes the objections raised by surrounding Councils and wine¹ and primary producers² in the Goulburn-Mulwaree³, Queanbeyan-Palerang⁴ and Yass regions to the proposal.

We call on the NSW Government to follow the ACT Government, which banned waste incineration for energy production in 2020. In its Waste-to-Energy Policy 2020-2025⁵, the ACT Government acknowledged community opposition to potential toxic pollution and the need to focus on waste minimisation over the burning of waste for energy.

We would like to particularly highlight the following points in our objection to the proposal:

¹ Carpenter, Chris. Director/Winemaker at Lark Hill Biodynamic Winery (2022) quoted in ACT Greens Oppose Tarago Incinerator. 21 November 2022. <https://greens.org.au/act/news/media-release/act-greens-oppose-tarago-incinerator>

² Burns, Stephen (2022) "No to proposed incinerator at Tarago" in The Land. 23 November 2022. <https://www.theland.com.au/story/7963014/community-rallies-against-veolias-tarago-incinerator-proposal/>

³ Goulburn Mulwaree Council. "Council stands with Tarago community on energy from waste". 24 September 2022. <https://www.goulburn.nsw.gov.au/News-articles/Council-stands-with-Tarago-community-on-energy-from-waste>

⁴ Queanbeyan-Palerang Regional Council. "QPRC says NO to Woodlawn incinerator proposal". 24 February 2022. <https://www.qprc.nsw.gov.au/News-Media/QPRC-says-NO-to-Woodlawn-incinerator-proposal>

⁵ ACT Government (2020). ACT Waste-to-energy policy 2020-25. https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/3815/8509/9072/TCCS_ACT_Waste_to_Energy_Policy.pdf

- Incinerators contribute to climate change. They emit more CO2 per megawatt-hour than coal-fired, natural-gas fired, or oil-fired power plants.⁶
- Approximately one tonne of CO2 is emitted for every tonne of waste incinerated. Nearly half those emissions are derived from fossil sources such as plastic.⁷
- Incineration is not renewable energy. The proposed incinerator will burn finite resources (plastics, diesel, etc.) as fuel, creating over 2.2 million tonnes of contaminated incinerator bottom ash, and over 380,000 tonnes of hazardous APCr (Air Pollution Control Residue).⁸
- Investment in incineration reduces funding for recycling technologies, recycling companies and recycling jobs.⁹
- Recycling rates decrease as incineration rates increase.¹⁰
- More than 60% of the projected waste stream for the proposed incinerator comprises organics, paper/cardboard and plastics.¹¹
- Veolia has a poor environmental track record. Two days before release of the EIS they were issued a prevention notice for pollution of groundwaters at the Tarago facility. The NSW EPA stated "The EPA considers that there are reasonable and feasible measures that Veolia could have taken to prevent the potential for pollution of waters".¹² Residents regularly complain of the odours emanating from the site over the past ten years.¹³
- The NSW Government acknowledges the threat air pollution from EFW incinerators poses to human health "Populations can still experience health impacts when emissions are below the national standards, and for some common air pollutants, there is no safe threshold of impact."¹⁴
- A systematic review of the health impacts of waste incineration published in the Australian and New Zealand Journal of Public Health in 2020 concluded "there is insufficient evidence to

⁶ Facts about "waste-to-energy" incinerators. Global Alliance for Incinerator Alternatives, 2018. <https://www.no-burn.org/wp-content/uploads/2021/11/GAIA-Facts-about-WTE-incinerators-Jan2018-1-1.pdf>

⁷ United Kingdom Without Incineration Network (2022). "Unpaid cost to society from fossil CO2 released from UK incinerators". <https://ukwin.org.uk/facts/>

⁸ Veolia Woodlawn Advanced Energy Recovery Centre Environmental Impact Statement, Appendix E, Ash Management Study, October 2022, page vii

⁹ Facts about "waste-to-energy" incinerators. Global Alliance for Incinerator Alternatives, 2018. <https://www.no-burn.org/wp-content/uploads/2021/11/GAIA-Facts-about-WTE-incinerators-Jan2018-1-1.pdf>

¹⁰ United Kingdom Without Incineration Network (2022). "Unpaid cost to society from fossil CO2 released from UK incinerators". <https://ukwin.org.uk/facts/>

¹¹ Veolia Woodlawn Advanced Energy Recovery Centre Environmental Impact Statement, Appendix E, Ash Management Study, October 2022, page 9

¹² EPA notice 3503885, 24/10/22,

<https://app.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=3503885&id=3503885&option=notice&searchrange=general&range=s.96%20Prevention%20Notice&prp=no&status=Issued>

¹³ Twyford, Lottie "'Emissions don't stop at borders': Tarago residents make a pitch to ACT to oppose NSW incinerator", Riotact 20 April 2022. <https://the-riotact.com/emissions-dont-stop-at-borders-tarago-residents-make-a-pitch-to-act-to-oppose-nsw-incinerator/549350>

¹⁴ NSW Government. Energy from Waste Infrastructure Plan 2021. page 4

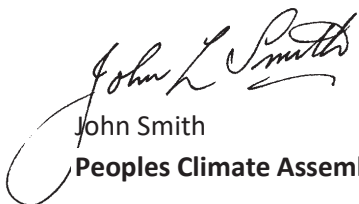
conclude that any incinerator is safe” and “contamination of food and ingestion of pollutants is a significant risk pathway for both nearby and distant residents”.¹⁵

The NSW Government’s *Energy from Waste Infrastructure Plan 2021* is revealing for its glib one-liners about energy recovery not being used “as an alternative to waste reduction or recycling”.¹⁶ Yet that is exactly what this is. After failing for years to address the waste management problems of Sydney, and a failed attempt to foist an incinerator on the people of western Sydney, the government is now looking for country areas (where the votes to be lost are fewer) to site these projects.¹⁷

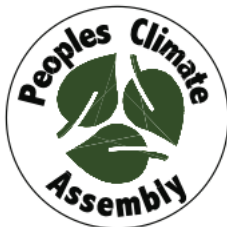
There has been a failure to develop large, sustainable markets for recycled plastic products and waste collection and resource recovery industries are very fragmented.¹⁸ These, and key aspects of waste minimisation, are things the government should have been dealing with.

Now is the time for the NSW Government to ensure a renewable and sustainable future for citizens in NSW and across the border in the ACT, to take serious action on waste-minimisation, the circular economy and recycling, and to not put lives and our environment at risk through this ill-conceived incinerator.

Yours sincerely


John Smith
Peoples Climate Assembly

peoples.climate.assembly@protonmail.com



Action is the antidote to despair

The Peoples Climate Assembly acknowledges that we live on the stolen land of the Indigenous people of Australia. We acknowledge the Ngunnawal and Ngambri people, the traditional custodians of the land on which Canberra is situated. Their sovereignty was never ceded. We pay our deepest respects to our nation's First Peoples and to Elders, past and present.

¹⁵ Tait, Peter W et al. “The health impacts of waste incineration: a systematic review”, Australian and New Zealand Journal of Public Health. 2020 vol. 44 no. 1

¹⁶ NSW Government. Energy from Waste Infrastructure Plan 2021. page 2

¹⁷ “New incinerator proposal ‘ridiculous, stupid, idiotic’ says Bowen”, The Independent Magazine 2021 <https://theindependentmagazine.com.au/2022/06/new-incinerator-proposal-ridiculous-stupid-idiotic-says-bowen/>

¹⁸ “The state of Australia’s recycling - how did we get into this mess?” WWF-Australia 23 Jun 2021 <https://www.wwf.org.au/news/blogs/the-state-of-australias-recycling-how-did-we-get-into-this-mess>