Department of Planning and Environment

Objection to SSD-21184278 Woodlawn Advanced Energy Recovery Centre

I have reviewed the EIS and strongly object to the proposal to build an incinerator and associated facilities at Tarago, New South Wales.

The EIS has not adequately considered many aspects of the construction and ongoing operation of the incinerator, as such it should be refused.

I have a number of concerns relating to the proposal and Attachment 1 provides a detailed response. In summary, they are;

- Inadequate or flawed modelling used
- Transport of waste via road and its impacts
- Potential for toxins to enter the surrounding environment
- Lack of information regarding contingency plans and future site remediation
- That waste to energy is not a renewable source of energy generation
- Waste of a potentially valuable resource
- Inconsistent with National Waste Policy and the principles of ecologically sustainable development

I look forward to the concerns raised in my submission being thoroughly addressed in the response to submissions.

Regards

Alex Lynch
12/12/2022

Attachment 1 – detailed response to Woodlawn Advanced Energy Recovery Centre Environmental Impact Statement

Table 1 – Assessment of impacts - response to EIS

Assessment of impacts	Comments
8.1 Air quality and odour	Mount Fairy does experience odour from the Woodlawn Mine (see EPA complaints) under certain weather conditions. However, it is unclear from the studies in the EIS whether these meteorological conditions have been modelled. The Air quality report states that the predicted concentrations from the project are equivalent to approved Eco Precinct impacts, well below typical ambient air pollutant concentrations for the region and negligible relative to a bushfire affected day. The reference to 'bushfire affected day' is misleading, as the data used wasn't just from a bushfire. NSW was experiencing catastrophic megafires during this period, particularly the area around the project site. As such, a different figure should be used for comparison. As the level of smoke was unprecedented and is not equivalent to a normal 'bushfire' day. It is not appropriate to use this data and present it as a standard 'bushfire affected day'. The report leads the reader to conclude that the air quality from the stack will be acceptable as it is not as bad as a 'bushfire affected' day. However, there are numerous studies that show that the impact of the black summer fires was not a standard bushfire affected day, and that the smoke from them was so toxic that it resulted in the 1% depletion of the ozone layer, and caused almost $2 billion dollars in smoke related health costs. In addition, it is impossible to guarantee the safety of the drinking water in the community, as the whole community surrounding the incinerator rely on tank water gathered from their roof tops. It is completely unacceptable to pollute the air and affect the safety of drinking water for residents. There is no mention of routine testing for water quality of residential drinking water in surrounding areas, or any mention of an incident that may increase the level of pollutants such as fire, or failure of the air filtration system leading to unfiltered pollutants entering the air. What remediation measures will be enforced for such an event, or in the event that it is found that locals tanks are becoming affected by general operations of the incinerator?

	What baseline monitoring is already occurring to provide benchmark data? Incinerators do not belong in regional areas. It should be located in Sydney where they don't rely on their roof to collect water for household use. A glaring omission from the EIS is the absence of a modelled scenario for a major fire incident at the incinerator. There should be a scenario considered of catastrophic failure of the incinerator leading to unsafe levels of air pollutants entering the local area and what mitigation and clean up measures will be provided by Veolia.
8.2 Human health	Given that the concentrations of the pollutants coming from the incinerator are not known, it is difficult to accept the findings from the human health assessment that there will be not be any measurable impact to the air quality surrounding the incinerator. What routine monitoring will be carried out to ensure ongoing impacts are not harmful to human health? Drinking water from rainwater tanks should be tested weekly at a minimum in the surrounding district.
8.3 Greenhouse gas and climate change	The modelling needs to separate the landfill generation of CO2 and the production of electricity CO2. It is misleading to say that incineration is a renewable source of energy as most of the energy generated is from burning plastic produced from petrochemicals, which is not a renewable resource.
8.4 Noise and vibration	No comment
8.5 Traffic and transport	I have reviewed **Appendix T – Traffic impact assessment** and have a number of serious concerns. I understand that feedstock will arrive via 4 haulage routes which include the following; 1. via Tarago Road/Bungendore Road and Collector Road for deliveries from Australian Capital Territory (ACT), Queanbeyan and Palerang; 2. via Kings Highway, Goulburn Road, Goulburn Street, Bungendore Road, and Collector Road for deliveries from Eurobodalla; 3. via Braidwood Road, Goulburn Street, Bungendore Road, and Collector Road for deliveries from Upper Lachlan and Yass Valley; and

	4. via Hume Highway, Braidwood Road, Goulburn Street, Bungendore Road, and Collector Road for deliveries from Goulburn-Mulwaree. The haulage route from the Eurobodalla is new and will lead to an increase in heavy vehicles travelling up and down the Clyde mountain on the Kings Highway. The assessment provides no further information on this and should be addressed. **Section ES3.3 Mid block capacity** The EIS should consider the worst case scenario for impacts to the 4 haulage routes, times of peak construction should not be treated as "one off" events as described in the EIS. **Section ES3.4 Operation** It is difficult to see how the assessment can conclude that 'Upon completion of project construction work, the LOS for Collector Road and Bungendore Road will return to the existing traffic conditions.' Particularly when they say that there will be other traffic movements associated with the operations of the project. And 75% will come from the Tarago Goulburn and Bungendore Canberra directions. **ES4 Management measures** I note that section ES4 states that 'No material traffic impacts are expected during operation of the project. Accordingly, only construction mitigation measures have been proposed'. However, I strongly disagree with this statement as it is clear that there will be an increase of traffic flow as a direct result of the project in both construction and operational phase. There will be a continuation of the high flow of heavy vehicles along the 4 regional roads which are already leading to unacceptable impacts on road safety. The traffic surveys should be carried out again, as the data collected from the previous surveys is from a Covid lockdown period where traffic was considerably less. The traffic assessment states that the surveyed daily and peak hourly traffic volumes in August 2021 are lower than those observed in 2020 and as a result a growth factor has been used to estimate current intersection traffic volumes reflective of typical conditions that would otherwise occur. **Section 4.11 Road maintenance contributions** The EIS states that 'Road maintenance contributions paid to the two respective Councils are adequate and will continue to be adequate to fund the additional road maintenance cost for the proposed project truck traffic which will be using the affected roads in each Council area.

	A dilapidation survey will be undertaken for all the affected road surfaces in Queanbeyan-Palerang Regional Council and the Goulburn-Mulwaree Council LGAs, prior to the commencement of the project construction. Any new road pavement damage which occurs to these roads during the project construction period from construction activities, which represent a potential traffic safety risk to the travelling public, will be immediately repaired by the relevant Council and Veolia will directly reimburse the relevant Council for the full cost of the emergency repairs.' However, given the ongoing disrepair of the regional roads, in particular Tarago Bungendore Road, and the Goulburn Braidwood Road, the road maintenance contributions are completely inadequate. The ongoing use of these roads by heavy vehicles directly related to the Woodlawn eco precinct is leading to unacceptable disintegration of the pavement. This is causing damage to light vehicles travelling along these roads. Before the dilapidation survey of the roads is considered as a baseline for future funding, the state of the existing roads needs to be assessed for suitability to safely take heavy vehicles. There are numerous narrow sections of the road, and many areas where there is irretrievable breakdown of the pavement directly related to heavy vehicle movements. **Table 6.1 mitigation measures** I have a number of concerns relating to the mitigation measures set out in Table 6.1, set out below. Road pavement dilapidation survey – the EIS states that a dilapidation survey will be undertaken for all the affected road surfaces in Queanbeyan-Palerang Regional Council and the Goulburn-Mulwaree Council LGAs, prior to the commencement of the project construction. However, the current state of the road pavement is in complete disrepair and very dangerous, which can be directly contributed to the transport of waste via heavy vehicles to the current Woodlawn landfill. The road pavement dilapidation survey should be undertaken now by Veolia to repair the damage that has already been done to the road pavement before they benchmark the road in its current condition. Extensive repairs should then be made, then the road pavement dilapidation survey can be carried out.

	I understand that there is a requirement for Veolia to be currently providing monies to QPRC to maintain the road, however, it appears that this funding is grossly inadequate. This should be revised before further works are required on these roads. Emergency road repairs – this section says that Veolia will directly reimburse the relevant Council for the full cost of any emergency road repairs during the project construction period. However, what is classed as emergency road repairs, if this is just continually filling holes with hot mix it is insufficient. In addition, this should apply to the life of the project, not just during the construction phase. This project will have an ongoing impact and should be appropriately costed for the proper repairs. **Local community liaison with residents during the construction period** - Regular notifications will be provided to the local community (local residents in Tarago and the surrounding areas) to advise of the current stage of the project construction work and associated daily and peak hourly construction traffic movements to allow local residents to be made aware of typical construction traffic movements throughout the project construction phase It is also recognised that additional notifications may be required for 24/7 working hours. This notification process should include all residents along the length of the regional roads being used to transport the waste. This includes small localities such as Mount Fairy through local media and most small localities have a Facebook group where residents can be kept up to date with the latest information. **Construction timeframe** I note that construction phase will be 3 years and that during this time there will be further increases to the traffic volume to the local roads as a direct result of the project. As previously advised, this will lead to unacceptable impacts to already badly damaged roads. **6.2 Operation phase** This section states that - No material traffic impacts are expected during the operations phase. It is difficult to see how this statement can be made given the impacts that heavy vehicles have on road pavements that are not designed to carry this type of traffic. The project will cause material ongoing impacts to the regional road pavement as a direct result of the heavy vehicles transporting waste to the facility.

	There will also be heavy vehicles transporting waste from Eurobodalla which is materially different to the current impact on traffic. There will be increased traffic delays with vehicles being held up behind trucks going up and down the Clyde mountain on the Kings highway. **Section 7 Conclusion** I note that the conclusion of the states that 'overall, the proposed development is not expected to significantly impact the existing regional or local traffic conditions in the locality or the respective road networks.' However, it is difficult to see how this conclusion was made given the lack of consideration of the issues listed above. The road network is already being significantly impacted by existing trucks and this project will exacerbate this impact. **Code of conduct** The EIS mentions that the truck drivers must adhere to a code of conduct. However, the behaviour of many of the truck drivers that transport waste currently to Woodlawn is unacceptable. Examples include; • Tailgating and/or overtaking vehicles when they are driving at the speed limit • Speeding which increases the level of pavement damage during wet weather • Speeding in the 80km/hr zone on Tarago Road between Bungendore and the water treatment plant • Veering onto the wrong side of the road • Travelling along road edges where there is no shoulder kicking up rocks at surrounding vehicles. • Not driving to local conditions. • Plastic waste comes off the trucks into surrounding paddocks polluting the local environment. As most of the vehicles have little to no identification on them, other than registration plates, it is difficult to identify a specific truck to report to police or the waste company they are employed by. It should not be an onus on the community to continually report the behaviour of these drivers. There is great concern amongst the community that this project will lead to increased dangers on already dangerous roads, and the traffic impact study has not adequately addressed these issues. **Stakeholder consultation** It does not appear that Queanbeyan Palerang Regional Council (QPRC), have been consulted in relation to the Draft Construction

	Traffic Management Plan, whereas Goulburn Mulwaree Council have. QPRC must be consulted on the Construction Traffic Management Plan as a significant proportion of the roads that will be impacted are within the QPRC local government area. The increase of trucks carting waste to the new facility will lead to further destruction of Tarago Road between Bungendore and the Woodlawn facility. In addition, the EIS has not considered the impact on school buses from the additional truck movements for both the construction period of 3 years, and the ongoing project. In addition, there has been little to no consultation with the local communities that will be impacted by this proposal. **Alternative transport methods for waste** There have been no alternative transport methods considered for the transport of waste as part of this project. There is an existing rail line between Canberra and Goulburn that could be utilised to transport this waste from these areas, which would significantly reduce the volume of heavy vehicles on the roads, making the regions roads much safer. It is unacceptable that alternatives have not been considered or addressed in the EIS. There should be a cost benefit analysis provided that thoroughly investigates the two different modes of transport. Given that Veolia currently accept waste via rail off loaded at the Crisps Creek Intermodal site, this needs to be addressed.
8.6 Groundwater	I am concerned that Veolia are not managing the wastewater on the site currently and have provided little information on how the groundwater will be protected from further impacts from this proposal. I note that there is a Prevention Notice that has been issued to Veolia regarding concerns of leachate management and groundwater contamination. There needs to be more information provided as to how the groundwater will be protected.
8.7 Surface water	The Prevention Notice mentioned above clearly demonstrates that the Sydney drinking water catchment is vulnerable to pollution from the current operation of the Bioreactor, and that

	the addition of the incinerator will place additional pressure on the on site management of the waste water generated by the project. It is concerning that they cannot manage the waste water that they already have correctly, and the incinerator will substantially add to the volume of waste water that requires competent management.
8.8 Contamination	No information has been provided on what contaminants will be created by the incinerator and how that will impact the site long term, and how it will be remediated. Pre-existing contamination does not provide an excuse to exacerbate contamination levels, particularly without a clear rehabilitation plan.
8.9 Bushfire	I understand that a site inspection was not carried out. I would expect that for a project of this magnitude, that at the minimum a site inspection would be carried out to tailor the bushfire management plan to the site's specific requirements. There have been numerous bushfires in the local area which move very quickly once started due to the strong prevailing north westerlies. The bushfire plan requires that there is sufficient reticulated water or other source of water on the site to meet the requirements for fighting bush fires. However, there is no information provided as to where this water will come from. What happens in droughts when there is little water around, are firefighters going to be expected to use contaminated water to fight fires?
8.10 Biodiversity	Whilst I understand that the project site will not lead to any significant impacts, as the transmission line upgrade has not been included in the project application it is unclear whether there would be any significant impacts to local biodiversity values. The transmission line must be assessed as part of this project, as its upgrade will only be required by the project. Critically Endangered Ecological Communities such as Werriwa Tablelands Cool Temperate Grassy Woodland is mapped in the area, as well as threatened animals such as the glossy black cockatoo, and threatened plants such as the Buttercup Double tail orchid.

	It is not reasonable to exclude it from the Project application.
8.11 Aboriginal heritage	No comment
8.12 Historic heritage	No comment
8.13 Visual	I note that the EIS states: A plume from the ARC stack may be visible at certain times and may occur under weather conditions where water vapour condenses resulting in a visible white or light grey plume. The weather conditions include cold and clear conditions (occurring mainly at night) as well as days with high relative humidity (ie wet and damp weather). A plume would not result in significant visual impacts, with plume height and duration of visibility subject to prevailing weather conditions. Other plumes not related to the ARC may also be visible in the landscape at certain times of year, including those associated with wood burning stoves from dwellings. It is not reasonable to compare the height of the plume to a plume from a wood burning stove from a dwelling. There is a substantial difference in the volume of the plume that would be associated with the incinerator. Where is the modelling to show plume height in the weather conditions described above? If the weather is cold and clear this means that there is little to no wind and the height of the plume could be substantial. Without modelling it is difficult to see how the EIS can conclude that the plume would not result in significant visual impacts.
8.14 Social	It should be noted that the population of the local and regional area is increasing, and as such the project will impact an increasing population. Has the modelling that has been done considered an increase in population growth? I note that the EIS states that some participants reported disrupted sleeping patterns and soreness in the throat **which they perceived** to be a result of odour. It is concerning that it is being represented as perception and does not adequately consider the health implications of odour (and its components eg VOCs). I understand that many of the odour issues are caused by mismanagement of the landfill which Veolia currently manage. How can they guarantee that they will be able to manage the incinerator when they cannot adequately manage the landfill to prevent odour affecting the community. The issue of public safety related to primary haulage route on local roads has inadequate mitigations provided. There should be

	an alternate transport options report provided that addresses the cost benefit of rail transport from Canberra and Goulburn which would remove the majority of heavy vehicles off the local roads. The issue of health and wellbeing related to stack emissions downplays the fact that there is currently no modelling available in Australia that provides comparable reference data. It also doesn't address that the content of the waste will be relatively unknown, meaning that they cannot know what the emissions are.
8.15 Economic	The economic analysis is devoid of any analysis of losses to other industries as a result of this project, and as such is incomplete.
8.16 Hazards	The EIS states that the PHA has not identified any hazardous incidents with potential for significant offsite safety impacts on surrounding land uses. I would suggest this is because there has not been adequate consideration of a range of possible scenarios. It is difficult to see how the hazard scenarios presented in the EIS such as fire involving waste fuel, and fire at the diesel storage will not result in off site impacts through the smoke travelling off the site. It seems to have only addressed fire radiation impacts. The Preliminary Hazard Analysis (PHA) has not considered the failure of the filtration system leading to unacceptable levels of dioxins and other pollutants contaminating surrounding environment.
8.17 Waste Management	I note from Table 8.55 Waste type, description, quantity and composition that 44% of the residual waste feedstock will still be going to landfill once it has been through the incineration process. I also note that of that 44%, 4% of the waste (APCr) will be classified as hazardous waste and will need further treatment to be classed as restricted solid waste. The EIS states that the EPA need to provide approval to allow for treatment and management of hazardous wastes. What assurances are there that this can happen? I note that Appendix E Ash Management Study states that "A risk relating to by-product composition, treatment requirements and potential future beneficial reuse viability will therefore exist until a data set of actual waste by-product chemical composition can be established and assessed (i.e. during the commissioning phase of the project)." Hazardous waste may have to be transported off the site to another hazardous waste facility. This will add more heavy

	vehicles to the local and regional roads and create more greenhouse gases. I also note that in stockpiling the APCr waste it will create leachate in the encapsulation cell, but there is no mention of its treatment or disposal option provided for this waste. Is the leachate intended to be classed as hazardous as well? I also note that over 1.6 ML of wastewater will be created by the process. Where will the metals go for recycling? Is there an actual recycling facility that can take this waste, or will it end up being stored on site or landfilled? Whilst the IBA is maturing in windrows how will this be protected from winds. It is a very windy site and what assessments have been done on the emissions that will come from these windrows, assuming there will be large volumes of this material. The EIS does not show how much material will be matured in windrows at any given time. It also seems that the only viable option will be to dispose of it to landfill given that the other options rely on further testing to determine the contents of the material. Therefore, the EIS currently indicates that this waste will go to landfill. Has this been correctly assumed in other modelling and calculations throughout the EIS? I note that the brine from the demineralisation plant will either be reused or disposed to ED1. What capacity does ED1 have? Can it actually hold this water? Table 8.56 outlines the waste management measures but does not include measures to manage the following; • Windrow management of IBA while maturing, particularly for dust • Treatment and disposal of APCr leachate

Table 2 – Assessment of other matters in the EIS

Matter	Comment
9.6.4 Ecologically Sustainable Development	See table 9.1 for their justification. I note that Part 8, specifically section 193 of the *Environmental Planning and Assessment Regulation 2021* sets out the principles of Ecologically Sustainable Development, and they are as follows; 193 Principles of ecologically sustainable development

	(1) The principles of ecologically sustainable development are the following— (a) the precautionary principle, (b) inter-generational equity, (c) conservation of biological diversity and ecological integrity, (d) improved valuation, pricing and incentive mechanisms. (2) The precautionary principle is that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. (3) In applying the precautionary principle, public and private decisions should be guided by— (a) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and (b) an assessment of the risk-weighted consequences of various options. (4) The principle of inter-generational equity is that the present generation should ensure the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. (5) The principle of the conservation of biological diversity and ecological integrity is that the conservation of biological diversity and ecological integrity should be a fundamental consideration. (6) The principle of improved valuation, pricing and incentive mechanisms is that environmental factors should be included in the valuation of assets and services, such as— (a) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement, and (b) the users of goods and services should pay prices based on the full life cycle of the costs of providing the goods and services, including the use of natural resources and assets and the ultimate disposal of waste, and (c) established environmental goals should be pursued in the most cost effective way by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems. When reading the above criteria and applying it to an incinerator it is difficult to see how any of these can correlate with an incinerator proposal. Table 9.1 in the EIS sets out the justification for the incinerator, but it relies on inadequate management measures, and the EIS has not considered all potential environmental impacts. The justification relies on flawed data.

	Diverting waste from landfill and burning it creating more pollution and taking away future opportunities for reuse does not meet the principle of social equity including inter-generational equity. As there has been inadequate cost/benefit analysis of alternative methods of transport of the waste to the proposed facility the project would not meet the principle of improved valuation and pricing of environmental resources. In addition, the data used to determine greenhouse impacts is not clear. Burning waste to create energy is not acceptable when there are greener energy alternatives available.
Preferred option	The preferred option is not to burn waste so that valuable resources can be mined once suitable technology and demand exists for resource recovery.
Concerns regarding the ability of Veolia to safely operate an incinerator.	I note from my search of the EPA Public Register, that Veolia Environmental Services (Australia) Pty Ltd has recently received a Prevention Notice No 3503885 dated 24 October 2022. I note that the Prevention Notice states that the EPA reasonably suspects that an activity has been or is being carried on in an environmentally unsatisfactory manner at the Premises by VEOLIA ENVIRONMENTAL SERVICES (AUSTRALIA) PTY LTD in that: a. Leachate from Coffer Dam 1 has been pumped into the outer ED1 where it is likely to pollute groundwater in contravention of s 120 of the Act; and b. The integrity of the liner in Coffer Dam 1 has not been maintained and/or operated in a proper and efficient manner, and the dam has been managed in a manner that is likely to contravene s64 of the Act I also note that they have received Penalty Infringement Notice Number 3173530425 on 16 July 2021, and that the EPA media release states that it was fined $15,000 for leaking containers carrying waste at the Crisps Creek Intermodal Facility at Tarago. In addition, as a local I am aware of the ongoing issues regarding odour from the Woodlawn Bioreactor, and that numerous complaints have been lodged, as evidenced by the 31 page document available on the Veolia website. As a Mount Fairy local I experience odour from the bioreactor from time to time. The above matters demonstrate that they are not able to manage their current operations to ensure that they are not causing environmental harm, so it would be difficult to see that they would be able to operate an incinerator without similar issues.

Location	How did the NSW government decide that this was an appropriate site for an incinerator? It appears to be politically motivated, rather than based on any strategic or scientific merits. **Why have waste incinerated in regional areas, where little waste is created, and not build the facilities where the waste is being generated?** If these facilities are safe then they can be built in the cities that create the waste, rather than being transported to the regions. This also reduces the need for waste to be transported hundreds of kilometres to be disposed, saving energy and reducing greenhouse gas emissions.
Circular Economy and Waste	What is being done to prevent the need for these facilities to be built in the first place? Appendix E Ash Management Study indicates that there will be a lot of organics, paper and cardboard that make up the waste being burnt. This is concerning as organics can be composted and paper and cardboard can be recycled. What is the NSW government doing to reduce the waste going to landfill in the first place. We know that QPRC don't recycle at the Bungendore Waste Transfer Station and it all goes to landfill. How much other waste is supposed to be recycled that isn't. This needs to be addressed. There are plenty of other ways that energy can be created cleanly from renewable energy. Energy generated from waste is going to lead to reduced air quality, so is not a suitable source of energy generation if the NSW government is going to take climate change and air quality seriously. The EIS states that the project will divert some 380,000 tpa from landfill, and that this supports a circular economy. It also states that 'supporting the circular economy by assisting to meet the Government's objective of 80% recovery from all waste streams by 2030 and instead creating low carbon energy, and recovering valuable metals and potentially generating materials for use in construction''.

	It is also clear that 44% of the waste that enters the incinerator will be landfilled, so almost half of it is still going to landfill, and the other portion creating air pollution. There doesn't appear to be anything circular about this proposal. I dispute the claim that incinerators are a legitimate waste recovery process after waste avoidance, reuse and recycling. They are used extensively in Europe as they don't have space for landfill. Australia should be landfilling until we can develop the technology to mine for the resources in existing landfills. Once the waste is burned there is no way to use the resources and they are destroyed. However, if the waste is stored in landfill until suitable technologies can be developed to mine these landfills to retrieve the resources. In the interim, the gases from landfill (methane) can be used to generate energy creating less environmental impact. Are local councils going to be committed to providing a certain volume of waste to feed the incinerator, thereby reducing their incentive to reduce, reuse and recycle their waste? **National Waste Policy** I note that the National Waste Policy sets out that resource recovery should be improved, and that there are five underlying principles: 1. Avoid waste. 2. Improve resource recovery. 3. Increase use of recycled materials. 4. Better management of material flows. 5. Improve information to support policy making. The NW Policy reinforces the waste hierarchy (listed above) which recognises that energy recovery is a preferrable method of waste management to disposal in a landfill. However, this does not mean that the burning of waste in incinerators is a suitable method for energy recovery. The EIS states that; A key objective of the NW Policy is to increase the recovery rate, or in this case the proportion of waste that is recycled or subject to energy recovery. The NW Policy includes: Strategy 7 Increasing industry capacity Identify and address opportunities across municipal solid waste, commercial and industrial waste, and construction and demolition waste streams for improved collection,

	recycling and energy recovery, to deliver ongoing improvements in diversion from landfill, improved quality of recycled content and use of the waste hierarchy. Hence, the NW Policy supports the development of the energy recovery industry nationally. Once again, though, the incineration of waste is not appropriate energy recovery.