

12 December 2022

Department of Planning and Environment

Submission

## State Significant Development: Veolia Woodlawn Advanced Recovery Centre

The Greens NSW oppose the development of an industrial waste-to-energy incinerator by Veolia in Tarago due to the significant detrimental effect it would have on the environment, community health and the local economy of the Tarago region.

### Lack of Social Licence

The proposed incinerator has already caused significant alarm and distress throughout the community, which is guaranteed to only increase if the project is approved. This project has no social licence as demonstrated by the large displays of dissent by the community including the community groups No Waste Incinerator Tarago and Communities Against the Tarago Incinerator (CATTI).

The NSW Energy from Waste Policy states that incinerators should only be allowed when community acceptance has been obtained. Waste incinerators have been rejected by communities across New South Wales. In 2018, the proposed Eastern Creek waste incinerator was rejected by the NSW Independent Planning Commission which found it was not in the public interest. This came after an extended period of community opposition. Similarly, the proposed Matraville Incinerator saw strong opposition from the local community and was ultimately withdrawn by the proponent.

As a result of this determination by the community to oppose waste to energy incinerators, the NSW Government ultimately introduced regulations that prohibited them in the Greater Sydney basin. The Greens believe that waste to energy incineration should be prohibited across the entire state instead of these projects being forced upon regional communities. There is also strong community opposition in Tarago against this incinerator. If waste to energy incineration is not in the public interest in Greater Sydney, it is not in the public interest of the communities of the NSW Tablelands.<sup>1</sup>

### Toxic Impact on Health and Environment

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<sup>1</sup> <https://www.notaragoincinerator.com/howtowriteanobjection>

It is estimated that the proposed incinerator will emit 140,000 tonnes of greenhouse gases every year and create 2.2 million tonnes of toxic waste ash, including 380,000 tonnes of air pollution control residue classified as hazardous waste by the EPA.

Over the course of the 25 year lifespan that the Veolia waste incinerator will be operating, it will emit toxic air pollution 24 hours a day, 365 days a year. This will significantly impact air quality in Tarago, but also potentially impact surrounding communities, including in Canberra, Goulburn, Gunning and Yass.

A 2019 systematic review into the health impacts of waste incinerators published in *The Australian and New Zealand Journal of Public Health* concluded that there is not enough evidence to prove that any waste incinerator is safe, and highlighted the significant health risks posed by the contamination of food and ingestion of pollutants.<sup>2</sup>

The substances that will be emitted by the incinerator include acid gases, toxic heavy metal particulates and persistent organic particulates. Some of the known health impacts of particulate pollutants are decreased lung function, cardiac disease and, in some cases, death.<sup>3</sup> Many of these by-products will end up in the environment as a result of dioxins, furans and heavy metals seeping into soils and waterways.

Veolia's claims that waste-to-energy incineration is a cleaner method of creating energy is inconsistent with scientific evidence of the impacts of incineration on greenhouse gas emissions. Incinerating waste can produce equivalent or higher levels of CO<sub>2</sub> emissions per unit of electricity generated than oil, natural-gas or coal-fired power plants.<sup>4</sup> In 2011, Denmark discovered that their waste incinerators had actually been producing double the amount of estimated carbon dioxide, which resulted in them failing to meet their Kyoto Protocol greenhouse gas reduction targets.<sup>5</sup>

Studies have demonstrated that there is a significant increase for those living in close proximity to incinerator facilities of dying from cancer<sup>6</sup>, and there is also evidence that living in close proximity to incinerators increases the risk of birth defects.

As a signatory to the Stockholm Convention, Australia is under obligations to eradicate the production of dioxins and furans, which are both POPs and are known to be carcinogenic (cancer inducing), mutagenic (mutation inducing, like x-rays), and teratogenic (birth-defect inducing) and do not break down.

This toxic pollution will also impact agricultural businesses and food production. Research by Zero Waste Europe on three incinerators in Spain, Czechia and Lithuania found high levels of contamination in the areas surrounding the incinerators. The majority of eggs in the vicinity of the incinerators that were analysed exceeded the EU action limits for food safety as regulated in the EU Directive 2013/711/EU and a high percentage of those eggs exceeded the safe level for

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<sup>2</sup> <https://www.notaragoincinerator.com/howtowriteanobjection>

<sup>3</sup> <https://www.notaragoincinerator.com/howtowriteanobjection>

<sup>4</sup> <https://www.no-burn.org/wp-content/uploads/GAIA-Facts-about-WTE-incinerators-Jan2018-1.pdf>

<sup>5</sup> <https://www.no-burn.org/wp-content/uploads/GAIA-Facts-about-WTE-incinerators-Jan2018-1.pdf>

<sup>6</sup> Waste Incineration and Public Health (2000), Committee on Health Effects of Waste Incineration, Board on Environmental Studies and Toxicology, Commission on Life Sciences, National Research Council, National Academy Press, pp. 6-7

consumption.<sup>7</sup> Their analysis of the vegetation and pine needles also showed high levels of dioxins in the vicinity of the waste incinerators.

Claims that newer facilities with better technology have a greater capacity to reduce the amount of toxins and pollutants that help eliminate the release of these toxins are hard to verify. From the studies that have been undertaken there is no clear information about the exact level of pollutant reduction and the long term effects of remaining pollutants on human health.

The proposal will also require hazardous waste byproducts to be stored in the ground near Tarago, posing a significant risk to the groundwater not only for the surrounding region, but potentially the wider catchment.

Veolia also has a record of non-compliance with local safety standards for their overseas incinerators, as well as with their existing Woodlawn facility. In October this year, the company received a prevention notice from the EPA for groundwater pollution

## **Contributions to the Waste Crisis**

This project, like all waste to energy incinerators, is inherently incompatible with the shift towards a circular economy. Over the project's lifespan of 25 years a continuous supply of waste would be required. This is contrary to the NSW Waste Strategy's goals of significantly reducing the amount of waste produced in NSW.

In a policy shift towards zero-waste and a circular economy, the European Union has recommended that member states decommission old plants without replacements and encourage more investment in source separation and non-incineration technologies.<sup>8</sup>

The EU has also moved to exclude incineration facilities from the "sustainable finance taxonomy" which established a subsidy scheme for environmentally beneficial projects.

In the US, the number of waste incinerators has remained steady at 113 plants for the past decade<sup>9</sup>. The US Department of Energy reported a stagnation of the incineration industry since the early 1990s, caused by a growth in recycling and composting, strong public opposition and operators' failure to adapt to increased environmental protection regulations.

Waste incinerators act as a disincentive to local governments, corporations and individuals to reduce their waste creation and recycle their waste. Waste incinerators require councils to commit to long-term contracts to supply a certain volume of waste for incineration for decades to come, meaning the councils will not be able to find alternative solutions for their waste processing.

## **Recommendations**

The Greens NSW recommend that Veolia's proposal to construct a waste-to-energy incinerator in Tarago be rejected.

Yours sincerely

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<sup>7</sup> <https://zerowasteeurope.eu/press-release/130494/>

<sup>8</sup> <https://www.parliament.nsw.gov.au/lcdocs/submissions/58034/0172%20National%20Toxics%20Net%20work.pdf>

<sup>9</sup> <https://www.parliament.nsw.gov.au/lcdocs/submissions/58034/0172%20National%20Toxics%20Net%20work.pdf>

A handwritten signature in blue ink, appearing to read 'Cate Faehrmann', with a long horizontal flourish extending to the right.

Cate Faehrmann MLC

Greens NSW waste spokesperson