

Submission Against the Proposed Mount Piper Energy Recovery Project

I am making this submission on behalf of myself, my family, and much of the Portland and Greater Lithgow community. We strongly oppose the proposed “Energy Recovery Project” for the following reasons:

- The project poses a significant threat to both community health, and the environment. In addition, it poses a significant threat to livestock and primary production on properties surrounding the facility at Mt Piper.
- The fact that the project proposes to construct and operate a high-risk polluting facility in an identified vulnerable/low income community, raises a very serious issue of the violation of human rights. Further, it undermines both social and environmental justice.
- It will be unavoidable to prevent all toxic fly ash produced from the project from entering nearby waterways. Creeks in and around the Mount Piper site, raise grave concerns for the pollution of Cox’s River which leads directly into Sydney’s main water source Warragamba Dam. Despite best-practice requirements, it is impossible to adequately safeguard waterways. Due to this, the proposed project stands to negatively impact a significant part of the state’s population. This simply cannot be ignored.
- The proposed public health and environmental safeguards employed are largely unproven and inadequate.
- In situations such as this, it is vital that epidemiological studies be undertaken. However, this has not been done most likely due to the fact that results from such a study would have been too damning to continue with the project.
- It is noted that extensive risk assessment analyses have been undertaken in preparation for the project. However, relying solely on data arising from such studies is problematic due the reliance on predictive modelling techniques that are routinely unreliable.
- The extensive research conducted for the project is blatantly biased.
- Despite the project’s claims that the current plant will use new technologies that are proven and reliable, studies of similar technologies show that these claims are in fact unproven. Further, evidence from the Netherlands confirms that even the newest incinerator technologies cause significant pollution and health impacts to the surrounding communities and their environment (Arkenbout, Able. 2018. *Hidden Emissions: A Story from the Netherlands Case Study*).
- Waste to energy incinerators emit more toxic air pollutants and ghg’s per unit of energy than coal, oil, and gas (U.S. EPA eGRID 2012 Database. Analysis by Energy

Justice Network. *The Inventory of Sources and Environmental Releases of Dioxin-Like compounds in the United States: The year 2000 Update*. March 2005 External Review).

- Mass combustion, Gasification, and Pyrolysis type technologies pose environmental and public health impacts in surrounding communities and globally through the dispersion of persistent organic pollutants and ghg's, while creating highly toxic ash that will require secure landfill (Bell, L and Bremmer, J. 2013. *Burning waste for energy: it doesn't stack up*. The National Toxics Network, Australia).
- The proposed 'Energy Recovery Project' will also emit nanoparticles, toxic heavy metals such as arsenic, lead, mercury, and acid gases that have serious impacts on human health (British Society for Ecological Medicine. 2008. *The Health Effects of Waste Incinerators*. 4th Report of the British Society for Ecological Medicine). Many of these pollutants are carried on the wind impacting communities and ecosystems long distances from the point of origin (Stockholm Convention on Persistent Organic Pollutants 2001).
- Many chemicals of concern from emissions are not monitored or regulated in Australia even though they are unavoidably released from incinerators such as the one you propose (National Toxics Network. 2020. *Federal Waste Inquiry: Waste Management and Recycling in Australia*).
- With the above point in mind, how is it possible that you CLAIM our communities will not be impacted in anyway? This is simply untrue.
- The project has been misrepresented as a 'renewable' clean source of energy.
- The project has been deceptive in that the word 'incinerator' is never mentioned. Instead you cleverly describe an 'Energy Recovery Project' and push it as a 'Green Energy' solution. This has clearly been a public-relations stunt to cover up an industry that has a dirty past and an extremely negative public perception.
- The project has been pushed as a solution to assist with Sydney's waste problem. In truth, you are dealing with one problem by creating a far greater one.
- The project claims to be a more environmentally sound alternative to landfill. These claims are unfounded.
- The proposal has not been transparent in educating the communities of the true nature of the project. In truth, this project appears to be proposing gasification like procedures which are categorised as incineration by the EU and US Environmental Protection Authority (EPA). The current proposal is therefor far from being a 'green energy' solution.
- The project has employed a 'smoke and mirrors' technique to avoid certain, and justified public outcry.

- The current project is not in anyway aligned with Australia's legal obligation under the Stockholm Convention to eradicate dioxins and furans.
- The waste incinerator industry has for decades been known as the HIGHEST source of global dioxin pollution. This industry has long been referred to as the 'Dioxin Factory' industry. Dioxin is one of the most toxic compounds ever studied (Bell, L and Bremmer, J. 2013. *Burning waste for energy: it doesn't stack up*. The National Toxics Network, Australia), yet your proposal intends to construct and operate such an incinerator in our community.
- Your project also raises grave concerns as to property devaluation in towns neighbouring the power station.
- After the proposed gasification/incineration process, 25% to 30% of the original waste mass remains as ash which is then put into landfill. Only this resulting landfill is now hazardous waste that is highly toxic.
- Similar 'Waste to Energy' Projects in Eastern Creek NSW (Next Generation NSW Pty Ltd) and Fishwick ACT (Captital Recycling and ActewAGL) were refused planning approval by the NSW Independent Planning Commission in 2018 and 2019 respectively. This was due to the risks to human health and increased pollution outweighing the benefits of the projects.

With the above in mind, I, and many others in the local community, believe it is unacceptable for the Mount Piper Energy Recovery Project to proceed.

Yours Faithfully

Angela Batty