

870 Ophir Rd Summer Hill Creek NSW 2800 www.cwecouncil.com

Dear Sir/Madam,

## Submission: Mt Piper Energy Recovery Project Application Number SSD-8294

The Central West Environment Council (CWEC) objects to this proposal. Whilst it seems an obvious win-win solution to our on-going waste problems as well as providing much needed energy, burning waste for energy is not as simple as it sounds and has several environmental impacts and implications. So CWEC is objecting on the following grounds:

## AIR POLLUTION

• There is a high risk of air pollution to humans and biota in the surrounding district. Whilst modern waste-to-energy plants have significantly reduced toxic emissions, it does not appear to be possible to completely eliminate toxic ash, especially particulates and sulphur dioxide from these types of projects (AE, 2008; Towie 2019). One of our member groups in Lithgow is particularly concerned about this aspect and has provided a detailed submission.

## INADEQUATE CONSIDERATION OF ALTERNATIVES

- The burning of waste should be very low in the priority list of solutions. We should be first considering, in order of priority: reduction, reuse, recycling and waste minimization eg anaerobic digestion. Only after that should be talking about energy recovery, after which the last resort is, of course, landfill. Reduction, re-use and recycling are own government standards, so should be followed. A project such as this basically demonstrates that we are not trying hard enough to meet these standards.
- Our concern is that should this approved, there will be less effort made to reduce the need for programs designed to effect the top three priorities. Complacency will set in and a precedent will be set.
- Funds needed for this project would be better directed towards the above alternatives. Lithgow is becoming a 'transition town' and should set a target for zero waste, setting an example for other towns to follow and eliminating the need for such infrastructure.

• It is understood that a better process of turning waste to energy would involve gasification, rather than combustion as this permits a better control of emissions (LaMonica, 2011).

USE OF MATERIALS SUITABLE FOR RECYCLING

• Although it is stated that only material left over after recycling will be used, once the plant is operational, a waste stream will need to be assured and it is probable that recyclable materials may be permitted into the production line as has already happened in Western Australia (Towie, 2019).

UNSUITABLE LOCATION

• There will be a large and unnecessary increase in traffic to this plant. If the plant is to go ahead, it should be situated near the source of its material to reduce congestion and carbon emissions.

So in conclusion, we are concerned that alternatives to the project have not been considered in enough detail; that controls may not be strict enough to safeguard the local environment; and that it is clearly situated too far from its source of materials.

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Cilla Kinross President Central West Environment Council

28<sup>th</sup> February 2020

## References

AE News, n.d., Negative Impacts of Incineration-based Waste-to-Energy Technology, available at: <u>https://www.alternative-energy-news.info/negative-impacts-waste-to-energy/</u>. Accessed 27/02/2020.

LaMonica, M. 2011, Waste to energy: Green or greenwash? Available at: <u>https://www.cnet.com/news/waste-to-energy-green-or-greenwash/</u>. Accessed 27/02/2020.

Towie, N. 2019, Burning issue: are waste-to-energy plants a good idea? The Guardian, 28/2/2019.