

Dear Hon. Penny Sharpe

We are writing to you on behalf of Long Water Agricultural Association following the recent communication from the EPA which was instigated by your office. As an association we find this response very underwhelming and nor does it address most of our concerns related to waste incineration at the Woodlawn Ecoprecinct.

There are a number of points in this response which concern us and we believe need further investigation/follow up.

- 1) "The NSW Government supports energy recovery where it is used to manage genuine residual waste and support NSW's transition towards a circular economy. Energy recovery from waste is only supported in respect of genuine residual waste where no higher order use or resource recovery outcome exists."

This statement is completely contradicted by the UN Special Rapporteur on Toxics and Human Rights (Marcus Orellana) in his End of Mission Statement to Australia on the 8th September 2023 when he stated "It (Waste incineration) reflects a linear process that is incompatible with a circular economy. Incineration imposes heavy health and other costs on local communities, and it is a significant source of greenhouse gases. It has been reported that even the most modern incinerators produce dioxins, furans and toxic ash."

The NSW government statement is also of significant concern as it may well delay the infrastructure that will create higher order use or recovery. As the UK have seen approximately 11% of waste collected for recycling is incinerated and furthermore it was found regions tied into incineration had low recycling rates (Guardian UK 7/3/2021). This article also claims energy from waste is the second dirtiest form of producing energy secondary only to coal. This is a heavy cost to the environment. Rather than build an incinerator would we not be better to promote and ensure recycling through building of facilities and incentives. As the environment minister surely this is your role to promote such technology not to hide behind the EPA and a former governments policy which has numerous flaws.

Lastly we wonder who will ensure that the waste stream to the Woodlawn incinerator doesn't contain recyclables especially as it has been documented councils have been collecting recyclables and waste and combining them together.

- 2) "Veolia has made commitments to the NSW Government and community in relation to the expected environmental operation and performance of the Woodlawn Eco Precinct. It is reasonable for the community to expect Veolia to honor those commitments. "

This statement feels hollow to those around Tarago as Veolia for years has not upheld its previous license conditions and has numerous notices and fines. It has also failed to meet its monitoring requirements 92 times from 2002 to September the 5th 2022. Interestingly they also have not submitted their report for the last year yet.

It is also worth noting that the EPA recorded 305 odour complaints in 2022 and 280 to the 4th of September in 2023. As such we suggest you visit Tarago for a week to experience the smell and judge whether you think Veolia would then be able to uphold the standards required around waste incineration without breeches.

- 3) "The EPA has investigated reports of environmental incidents and pollution and taken regulatory action as required"

While we appreciate the EPA has taken action against Veolia, we feel it is often a slap on the wrist for their infringements and the fines are inconsequential to them. They appear to pay them and move on, only to re infringe.

This sentiment was echoed by the UN Special Rapporteur for Human Right and Toxins (Marcos Orellana) on his most recent visit to Australia when in his end of mission statement, he said;

“it will also require a review of a legal framework for environmental protection that is largely reactive and beneath international best practices.”

4) We would also like to draw your attention to the issue of PFAS and to an article in Environmental Science and Technology Emission of per- and polyfluroalkyl substances from a waste to energy plant - Occurrences in ashes, treated process water and first observation in flue gas by BJorklund et al(2023). Veolia during a recent meeting with our group, told us it was not possible to measure PFAS in the flue gas and that the high temperature of the process would breakdown the PFAs structure, meanwhile this article published in June 2023 details a method for flue gas PFAS sampling. They also state “our results demonstrate that some PFASs are not fully degraded by the high temperatures during WtE conversion and can be emitted from the plant via ash, gypsum, treated process water and flue gas.” The authors acknowledge this is the first time they believe it has been done and needs more validation.

The concern our association has with this PFAS waste, firstly it takes more than a 1,000 years to break down, and secondly that the incinerator and our region will become the concentration for a majority of PFAS waste from Sydney construction and recycled materials used for feed stock in the incineration process. This is especially concerning to our group given our proximity to the incinerator for us as residents and potential ongoing impacts it will have on our produce. The carcinogenic outcomes to human health from exposure to PFAs are well known and should be of major concern to the EPA.

Considering the above and the documented health risks of waste incinerations (Tait et al,2020) We ask you what has changed since 2018 when you said ““Labor shares the concerns of people in Western Sydney who will be directly affected by this dangerous incinerator, and now a cross-party committee has validated them.” As from my understanding the technology hasn’t changed so why should Tarago have to endure incineration that you didn’t think was suitable for Western Sydney.

It is also well documented Waste Incineration is often inflicted on lower socioeconomic areas or areas less able to resist and our colleague Prue Carr rightly pointed this out when she said “The fact is this government would never enforce toxic incinerator fumes on the homes, schools and shops over on the North Shore, so why should people in Western Sydney be forced to endure toxic pollution from this potentially deadly plant.” My question then is how is it fair that regional NSW be asked to burn Sydney’s rubbish and endure the “toxic incinerator fumes”.

As an association we implore you and your government to reinvestigate waste to energy incineration as an appropriate means for waste management as the EU and US are. We ask you is this the best NSW can do in the face of the current climate crisis and can we afford the carbon footprint this method of waste disposal creates. Furthermore with no food security policy for NSW or Australia can we put a highly fertile region of agriculture at risk especially when ingestion of the byproducts of incineration is seen as the most harmful route.

Our association would welcome any further discussion with you at place of your convince or should you wish to see Tarago and the region you would be welcome to view some of our enterprises and see our produce.

Kind Regards

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Chairman Long Water Agricultural Association

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Secretary Long Water Agricultural Association

References

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Tait, P. W., Brew, J., Che, A., Costanzo, A., Danyluk, A., Davis, M., Khalaf, A., McMahon, K., Watson, A., Rowcliff, K., & Bowles, D. (2020). The health impacts of waste incineration: a systematic review. *Australian and New Zealand journal of public health*, 44(1), 40–48. <https://doi.org/10.1111/1753-6405.12939>