

Submission to the NSW Independent Planning Committee

The National Toxics Network makes the following submission in relation to the proposed Eastern Creek Energy from Waste facility SSD 6236

Waste to energy incinerator technologies impose significant pollution burdens and associated health and environmental impacts that extend well beyond the facility fence-line. Waste to energy Incinerators destroy finite resources and leave a legacy of dangerous air emissions and toxic ash. Establishing waste to energy incinerators is a step in the wrong direction for positive action on climate change, clean renewable energy, sustainable waste management and a circular economy. We are calling for the adoption of safe, sustainable and proven Zero Waste management models in all Australian states and Territories.¹

Australians have rejected this industry for decades, but the incinerator lobby have recently targeted politicians to seek legislative support and subsidies which are needed for the industry to be viable. Burning waste for energy contributes more greenhouse gases (GHGs)² and toxic air pollutants³ per unit of energy than coal and gas. Waste incinerators rely on the high calorific value of plastic – a fossil fuel- based material that contains numerous toxic substances that contribute to incinerator air pollution. Waste to energy incinerators do not provide clean renewable energy and therefore should not be entitled to renewable energy subsidies, grants or funds. These funds should be directed to real renewable energy projects.

This submission reaffirms the resolve of Australians to stand firm and reject this polluting industry. We acknowledge the global consensus that carbon pollution is driving dangerous climate change.

The global and existential threat that climate change represents is also an opportunity to make change towards ecologically sustainable systems of food and materials production, global peace, security and unity. Zero Waste Solutions represents real action on climate change.

We call on the NSW government to reject renewable energy subsidies for waste incineration.

Waste incineration emits a range of toxic and hazardous air pollutants⁴ that include mercury, nanoparticles and Persistent Organic Pollutants (POPs) such as dioxins and furans (PCDD/DF), hexachlorobenzene (HCB), Polychlorinated Biphenyls (PCBs) and brominated persistent organic pollutants which are subject to the International Stockholm Convention on POPs. Australia is a signatory to this convention and are therefore obliged to reduce and where possible, eliminate all forms POPs. These POPs are persistent and toxic in the environment, bio-accumulate up the food chain and can travel vast distances across borders ultimately accumulating in the polar ice caps posing disproportionate adverse impacts on indigenous communities in these regions.⁶ Approving

1. Connett P, *The Zero Waste Solution: Unrashing the Planet One Community at a Time*, Chelsea Green Publishing, 2013

2 U.S. EPA eGRID 2012 Database. Analysis by Energy Justice Network. www.EnergyJustice.net

3 USEPA (2005) *The Inventory of Sources and Environmental Releases of Dioxin-Like compounds in the United States: The Year 2000 Update*. March 2005 External Review Draft.

incinerators will unnecessarily increase Australia's output of dioxins and other POPs thereby undermining the objectives of the convention.

We call on the NSW government to uphold the Stockholm Convention and reject this proposal.

It is the most vulnerable in the community, such as children, that are most at risk from the toxic air pollutants emitted by waste incinerators and the stockpiles of toxic ash they generate. These pollutants impact health at low levels of exposure. Host communities carry the disproportionate burdens of this industrial pollution through contaminated land and air leaving residues in their environment that can contaminate the food chain, water and other life support systems they depend upon⁷. **We call on the NSW government to protect children's environmental health by rejecting this proposal.**

Independent research⁸ has reported that zero waste management systems that use recycling, re-use, composting and anaerobic digestion generate many more jobs than incinerators. In general terms, waste incinerators are expensive, computer controlled, and mostly automated technology that only requires a small workforce to operate. Zero Waste Solutions based around recycling, re-use and composting, have a high employment opportunities and flow-on effects throughout the community and economy. **We call on the NSW government to protect jobs in the numerous downstream economies such as in the recycling, reuse and composting sectors by rejecting this proposal.**

Australia is at a cross roads. Decisions made today about waste management will have long term financial, ecological and human rights impacts. Burning our waste for energy entrenches an unsustainable linear economic model of raw materials extraction, production, consumption and disposal, wasting the finite resources contained in our waste streams that belong to future generations. While the EU moves to end subsidies for waste incineration and legislate for Zero Waste Solutions with strong policies to discourage the establishment of new incinerators and decommission old incinerators⁹, Australia has a unique opportunity to learn from the mistakes of other comparable western countries without repeating them. **We call on the NSW government to invest in sustainable zero waste policy to address impending climate threats.**

4 British Society for Ecological Medicine (2008) *The Health Effects of Waste Incinerators*. 4th Report of the British Society for Ecological Medicine.

5 Stockholm Convention on Persistent Organic Pollutants 2001, www.pops.int

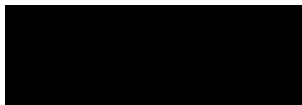
6 Elizabeth Burleson & Stephanie Dodson Dougherty, Arctic Justice: Addressing Persistent Organic Pollutants, 30 *Law & Ineq.* 57 (2012).

7 Petrlick. J, and Bell. L. (2017) Toxic Ash Poisons our Food Chain. IPEN in cooperation with Arnika Association (Czech Republic) and National Toxics Network (Australia).

8 More Jobs, Less Pollution: Growing the Recycling Economy in the U.S. Prepared by: Tellus Institute with Sound Resource Management 2011; More jobs, less waste. Potential for job creation through higher rates of recycling in the UK and EU. Friends of the Earth UK, September 2010

9 European Commission, The role of waste-to-energy in the circular economy, COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS, Brussels, 26.1.2017 COM(2017).

Signed



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18th May 2018