

Independent Planning Commission NSW

Level 3, 201 Elizabeth Street

Sydney NSW 2000

21<sup>st</sup> May 2018

Dear Sir,

I would like to make a submission opposing the proposed Eastern Creek Energy from Waste Facility. I am a long time resident of Minchinbury, having purchased land in the estate in 1984 and moved into the suburb in 1989. My family's association with Minchinbury now stretches back over 30 years and we feel a strong connection to the local community. In short, and I am a proud, long-time resident of the suburb and of the area.

My family and I have been active members of the local community, having been involved in school P & C committees, the Minchinbury Parks Committee and local sporting clubs. Personally, I have been a committee member of the local Minchinbury Jets Soccer Club for 15 years, having been a long serving secretary and president of the club.

Our concerns were raised when the initial proposal of an Energy from Waste Facility (incinerator) was first published. I have carefully followed the submissions and subsequent rejections of both the first and second submissions proposing this facility

Following a review of many of the reports submitted by many different organisations, both government and non-government, I must state my strongest opposition to any approval and subsequent construction of this facility. The reasons for this are many but include the following.

- **The continual submission of the proponent of poorly planned and executed proposals for this facility.** After extremely negative feedback on the proponent's first and second applications. The third submission (that you are now considering) continues along the same path of containing inaccuracies and vagaries. The reviews by the State Government committee, The Environmental Protection Agency, NSW Health, Local Councils and independent experts have all cast very strong doubts on the reliability and accuracy of the information supplied in the proponent's development application. The fact that the proponent's comparable model (an energy from waste facility in England) not meeting the criteria of being a similar facility burning similar feedstocks shows the lack of accuracy and relevance of much of the proponents modelling used for the proposal for this facility.
- **Concerns regarding the pollutions that such a facility may produce.** Both NSW Health and the EPA have expressed strong concerns regarding the pollution that such a facility will produce and have opposed the facility on health grounds. The proponent has shown nothing in their revised application to change this stance. In fact the proponent's (rather cynical?) response has been to halve the projected pollution by only building half of the facility for now and to build the other half at a later date. This is hardly a solution to a very serious concern. The fact that this facility is proposed to be built in the western suburbs of Sydney

where air pollution already regularly exceeds recommend safe limits should exclude the facility from being built in its proposed site. Add to this the fact that it is to be built within a kilometre of local housing, who would suffer immensely from the industrial fallout (including Dioxins and Furans) and the location is totally inappropriate for this type of facility.

- **The proposed feedstock and operating temperatures of the facility.** The proponent's modelling requires over 500,000 tonnes of feedstock to feed the incinerator that powers the proposed Energy from Waste facility. The reports on the available feedstock show that there is currently less than half of the required feedstock available to fuel the facility. The remaining feedstock would have to be shipped in from locations other than the Sydney metropolitan areas of waste that could otherwise be reused or recycled would have to be used. The fact that we could be diverting material that is otherwise suited for reuse or recycling contravenes the government's guidelines for all Energy from Waste facilities and this alone should make this proposal unacceptable. If the second stage were to be built the demand for feedstock would be doubled. The proposed feedstock would also include 15% Floc Waste which is also unacceptable to use in a proposed Energy from Waste facility. It must also be taken into consideration that this proposal is for only half the facility to be built – ergo all figures in the proposal will need to be “doubled” if and when a second stage were built.

There are also very strong concerns for the operating temperatures that the proponent chooses to operate the incinerator. The proposed temperature of 850 degrees is well short of the required 1,100 degrees used in the UK facility that they have modelled their (flawed) proposal on. By not burning the exhaust gasses at 1,100 degrees the incinerator will not be burning off dangerous fine particle toxic pollutants.

- **Toxic Residue from the burning process.** With around 552,000 tonnes of waste being burnt the facility will produce around 168,000 tonnes of residue (142,000 tonnes of bottom ash and 22,000 tonnes of wet ash). This ash is toxic. The proponent's original intention was to use this in road base but this was rejected due to its toxicity. They now propose to simply store in on sit in tanks until they have too much (over 40,000 tonnes) and they ship it off to an as yet unnamed facility to dispose of it in an as yet to be advised way. There are even suggestions that it may be buried in the current DADI facility at Eastern Creek which would be in breach of their operating licence of the DADI site that is not allowed to accept putrefiable or toxic waste.
- **Lack of community acceptance of the proposal.** Despite numerous attempts by the proponent to try to get community acceptance of the proposal (including the very dubious offer / financial inducement of offering up to 1,000 local residents free solar panels), there is still an overwhelming opposition to the construction of this incinerator (Energy from Waste facility). There have been a very large number of submissions from the public (around 960) and an overwhelming 98% have opposed it, with 14 queries and only 2 in favour (0.02%). When considered with the fact that local councils, state government committees, NSW Health and the EPA have all opposed this facility this proposal fails totally in getting any worthwhile community acceptance
- **Impact of 24 hour / 7 Days a week facility on the adjoining suburbs.** With the proposed site being in such close proximity to local housing, the required operation of a 24 hour per day / 7 day a week that will generate noise, air pollution and odours make this site unsuitable for such an operation

- **Lack of Employment at the facility.** With a proposed total of approximately 55 people over the whole site (around 6 people per hectare) the facility will not meet the employment requirements for the area which are around 50 people per hectare.
- **The redirection of potential recoverable materials to incinerator feedstock.** The development of Energy from Waste facilities, whilst relatively new to Australia, is now an old outdated idea across many parts of the world. The concept of burning rubbish is now being replaced by the idea of a circular economy that encourages reuse, recycling and reduction of waste. This is the process that most progressive nations are now exploring. We should not be trapping our economy into an old idea of burning waste to generate electricity for the next 40 – 50 years until these facilities become redundant. We should be exploring and encouraging better waste management, not encouraging more waste to create feedstock for incinerators.

Whilst the points that I have raised are some of the major concerns, they are in no way all of the concerns that myself, my family the community in general and local government have for this proposed facility. The proponent has tried on numerous occasions to state that they are a source of “green” energy and that they would be reducing greenhouse gasses with new technology. Whilst the technology may be new the concept of burning a fuel (in this case waste) to heat up a boiler to drive a steam turbine is over 200 years old! Burning any fuel source creates pollution. Burning fuel sourced from toxic products (floc waste) and / or unknown products that comes from multiple sources is not environmentally friendly. It is an old idea that is polluting and, in this case, potentially catastrophic to the local environment and Sydney in general. We should not be “locking in” Sydney and the rest of Australia to this concept. This is not a case of “not in my backyard”. This facility should not be built anywhere. We, as a community and a nation, are far better than that. I trust that the Independent Planning Committee takes into account all of the evidence and opinion provided by all of the local community, local government, state government and independent experts against this proposal and finally fully reject it. Our environment, our state and our people will be a much better place without such a facility ever being built.

Kindest regards

Stephen Bradbury

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