



Communities Against the Tarago Incinerator Inc

www.notaragoincinerator.com

notaragoincinerator@gmail.com

<https://www.facebook.com/groups/491803828839813>

<https://www.facebook.com/profile.php?id=100080002033843>

30 March 2025

Submission to the NSW EPA Energy from Waste Framework Review and Options Paper

Introduction

Communities Against The Tarago Incinerator (CATTI) Inc strongly oppose the proposed changes outlined in the NSW Environmental Protection Agency (EPA) *Energy from Waste – Options Paper (Dec 2024)*. We also continue to oppose the existing Environment Operations (General) Regulation 2022 which exempts regional precincts, including Tarago (labelled as Southern Goulburn Mulwaree), from the general prohibition of thermal treatment of waste in NSW.

As a community-based organisation representing residents of Tarago and surrounding regions, we unequivocally reject any attempt to legitimise waste incineration as a solution to NSW's waste management issues. We further reject the premise that energy from waste incineration represents a safe, sustainable or equitable pathway forward.

This submission incorporates the lived experiences of our community, scientific evidence, well founded environmental principles, and draws upon the NSW Government's own policy documents. We call on the EPA to immediately undertake the seven actions identified in this submission to protect regional communities from preventable harm.

1 – This Is Not a Genuine Review

The EPA NSW *energy from waste framework review* website states that this review has been instigated because “the NSW *Energy from Waste Infrastructure Plan* committed to an assessment of the need for additional energy from waste capacity by 2025”¹.

It is therefore reasonable for the NSW government to undertake a transparent and detailed analysis of current waste volumes, current waste infrastructure capacity and forecasts into the future. It would be logical for this to include an evaluation of performance against the initiatives and 5/10 year targets to reduce waste set out in the *NSW Waste and Sustainable Materials Strategy 2041*² released in 2021, with results incorporated into updated modelling of future waste volume and infrastructure requirements. A rational review would also conduct a fresh assessment of alternative waste infrastructure options available, such as alternative new landfill sites with methane gas capture and other emerging technologies in order to validate the conclusions made back in 2021 that waste incineration was necessary.

The review website and EPA options paper³ provide no such analysis or information. Instead, they simply repeat four year old conclusions from the *NSW Waste and Sustainable Materials Strategy 2041* that Sydney's landfill space is set to run out by 2030 and that waste incineration infrastructure is therefore justified, with no new analysis or contemporary data to support or validate these conclusions.

¹ NSW *Energy From Waste Framework Review* website <https://yoursay.epa.nsw.gov.au/nsw-energy-waste-framework-review>

² *NSW Waste and Sustainable Materials Strategy 2041*, NSW Department of Planning, Industry and Environment, June 2021 <https://www.epa.nsw.gov.au/sites/default/files/nsw-waste-and-sustainable-materials-strategy-2041.pdf>

³ *Energy from waste – options paper*, NSW EPA, December 2024
https://yoursay.epa.nsw.gov.au/download_file/1373/684

Worse still, the EPA does not acknowledge what appears to be a 27% reduction in forecast waste volumes for NSW in 2041. In 2021, the *NSW Waste and Sustainable Materials Strategy 2041*, upon which most of the NSW energy from waste framework is based, forecast NSW waste volumes to grow to 37 million tonnes by 2041⁴. However, the options paper released by the EPA as part of this current framework review states that NSW waste volumes are forecast to grow to only 27 million tonnes in 2041⁵ – that is a 10 million tonne reduction!

Where is the detail, analysis and evaluation of what has brought about this significant decline and the implications for infrastructure requirements into the future?

If the EPA now thinks waste volumes in 2041 will be 27% less than they thought four years ago, then why is this review seeking to extend and expand the use of waste incineration in NSW? Why is no data, research or analysis being provided to the NSW public to justify the actions being proposed by the EPA? It seems the EPA is suffering groupthink and dogmatism when it comes to waste incineration. Rather than engaging in critical thinking, rational review and genuine consultation, the EPA appears to be holding firm to an ideological belief in waste incineration despite the absence of any community support or endorsement.

A genuine review of NSW's energy from waste framework would also include an assessment of the health and environmental impact of what the EPA is proposing, however sadly this is also completely absent from the review. The NSW Environment Minister Penny Sharpe stated on the Parliamentary record in March 2025⁶ that she has fulfilled a promise to the community in Tarago and Goulburn region by seeking additional advice from the office of the NSW Chief Scientist and Engineer on health and environmental issues we have raised around siting a waste incinerator in our region and that this is reflected in the EPA options paper which our community is able to provide input to. Despite this advice from the Minister, no details of any contemporary advice from the NSW Chief Scientist and Engineer have been disclosed to the public, nor have any of the community's concerns been recognised, considered or incorporated into this review of the NSW energy from waste framework.

The EPA must conduct a more genuine, critical and transparent review of the need for waste incineration within NSW backed up by independent research and analysis which is fully transparent and consulted with the public.

The review must also provide an opportunity for members of the public to hear directly from and ask questions of the EPA on this topic – particularly those in regional NSW who will be directly impacted by this policy.

2 - False Premise: Waste Incineration Is Not a Solution

The EPA Options Paper suggests that waste incineration is necessary to manage “residual waste” as part of a circular economy and that it can deliver “positive outcomes for the community and the environment”.

This is fundamentally flawed. Incineration is not part of a circular economy - it is linear and transforms waste into air pollution, greenhouse gases and toxic ash, transferring environmental burdens rather than eliminating them. Waste incineration sits outside the waste hierarchy, undermines recycling infrastructure,

⁴ *NSW Waste and Sustainable Materials Strategy 2041*, NSW Department of Planning, Industry and Environment, June 2021 <https://www.epa.nsw.gov.au/sites/default/files/nsw-waste-and-sustainable-materials-strategy-2041.pdf>

⁵ *Energy from waste – options paper*, NSW EPA, December 2024
https://yoursay.epa.nsw.gov.au/download_file/1373/684

⁶ Transcript – *NSW Parliament Budget Estimates: Portfolio Committee No. 7 – Planning and Environment*, 3 March 2025
<https://www.parliament.nsw.gov.au/lcdocs/transcripts/3453/Transcript%20-%20UNCORRECTED%20-%20PC7%20-%20Budget%20Estimates%202024-2025%20%E2%80%93%203%20March%202025.pdf>

and locks waste into incinerator feedstock rather than recovery and reuse. A circular economy must be built on reduce, reuse, repair and recycle, not rebranding pollution as power.

Experience in Europe and UK demonstrates that long-term contracts tied to incineration lock councils into supplying large volumes of waste to incineration, disincentivising reduction and diversion. This is how UK has found itself burning half of all household rubbish, instead of increasing recycling rates⁷. Continuing down this path will lock NSW into waste generation, not reduction and elimination.

The EPA must update and amend all relevant policy and framework documentation to acknowledge and reflect that waste incineration does not form part of a circular economy and in fact works counter to such a system.

3 - Health Risks Acknowledged by the NSW Government

The NSW Energy from Waste Policy Statement makes clear that “clean air is fundamental to everyone’s wellbeing: poor air quality can be particularly critical to the health of children and chronically ill and older people, as well as affecting the natural environment and amenity of communities”⁸.

A systematic Australian Public Health Association scientific review concluded “there is insufficient evidence to conclude that any incinerator is safe” and in particular “contamination of food and ingestion of pollutants is a significant risk pathway for both nearby and distant residents”⁹.

Even the EPA’s Infrastructure Plan¹⁰ acknowledges there is “no safe threshold of impact” for air pollutants from waste incineration facilities. These pollutants include dioxins, furans, PFAS, microplastics, heavy metals and brominated toxins—many of which are not even regulated under the proposed framework.

These compounds accumulate in soil, water and living tissue, leading to increased risks of cancer, neurological damage, respiratory illness and developmental disorders. The cumulative and long-term impacts, especially on vulnerable rural communities reliant on rainwater, agriculture, and home-grown food, are unacceptable.

The EPA must incorporate a detailed and transparent review of human health and environmental impacts of waste incineration into its review of the energy from waste framework. This must include genuine consultation with the public and be conducted by scientific experts in the field of environmental science and human health – not engineers or experts linked to the waste industry.

4 -Incineration is Not Positive For the Environment

The EPA Options Paper claim that waste incineration “can deliver positive outcomes for the community and environment” and other assertions that it is some kind of renewable or green energy source is not supported by any evidence. Continuing to perpetuate this propaganda from the waste management industry is pure greenwashing.

⁷ Government to crack down on waste incinerators with stricter standards for new builds, United Kingdom Government Press Release 30 December 2024 <https://www.gov.uk/government/news/government-to-crack-down-on-waste-incinerators-with-stricter-standards-for-new-builds>

⁸ NSW Energy from Waste Policy Statement, NSW Environment Protection Authority, June 2021 <https://www.epa.nsw.gov.au/sites/default/files/21p2938-energy-from-waste-policy-statement.pdf>

⁹ Tait et al, *The Health Impacts of Waste Incineration – A Systematic Review*, Australian and New Zealand Journal of Public Health, vol.44 no.1, 2020.

¹⁰ *Energy from Waste Infrastructure Plan*, NSW EPA, September 2021 <https://www.epa.nsw.gov.au/Publications/waste/Energy-from-Waste-Infrastructure-Plan>

Claims that waste incinerators produce less greenhouse gas emissions than coal-fired power stations are deliberately misleading. Waste incinerators emit more CO₂ per megawatt-hour than coal-fired, natural-gas fired or oil-fired power plants¹¹. There is also no evidence that building new waste incineration plants which generate energy will result in the closure of any existing coal-fired power stations. Energy from waste incineration is not listed as a renewable or green energy source in the NSW Electricity Infrastructure Roadmap¹², and it is specifically excluded from the National GreenPower Accreditation Program¹³ for renewable energy products.

The NSW government must immediately cease incorporating and remove all existing false and misleading claims that waste incineration can deliver positive outcomes for the community and environment from energy from waste framework documents.

5 – Regional Exploitation and Inequity

The NSW Government and EPA policy to ban waste incineration facilities in Sydney where the waste is generated and instead locate them in regional areas such as Tarago (Southern Goulburn Mulwaree precinct) reflects a clear policy of regional environmental exploitation and inequity. Sydney creates the waste, but regional NSW suffer the consequences. This is supported by the fact that Tarago and surrounding communities were not consulted before their region was declared an energy from waste precinct in the 2021 EPA *Energy from Waste Infrastructure Plan*, despite significant known local opposition. It can only be assumed that the policy drafters assume political and economic resistance will be lower in these areas.

The Community of Tarago already hosts Veolia's existing Bioreactor landfill, accepting 40% of Sydney's municipal waste, and will continue to do so at least until 2047 (as previously boasted on Veolia's website). The waste incinerator currently being proposed for Tarago (Southern Goulburn Mulwaree precinct), in accordance with the EPA infrastructure plan, will only divert a percentage of the existing waste already being received at that site. This means a new waste incinerator here will spread toxic pollutants throughout the local community, directly harming the region's health and environment, along with Sydney's drinking water catchment, while providing no additional waste management capacity for NSW over the next 20 plus years.

In addition to hosting one of NSW's largest landfills, Tarago (Southern Goulburn Mulwaree precinct) also hosts a zinc/copper/lead/gold/silver mine, wind farms, quarries and other industries on the horizon – all which come with direct impacts to the surrounding community. Adding waste incineration infrastructure to this constitutes an unacceptable cumulative impact to the local community and surrounding region. This is not shared burden for the greater good - it is cumulative punishment.

We remind the EPA that social license is a mandatory criterion under the current NSW Energy from Waste Policy Statement. No social license exists to locate a waste incinerator in Tarago (Southern Goulburn Mulwaree). Over 3,000 formal petition signatories, 619 objections during public exhibition (98.7% of all submissions), repeated objections by local representatives at every level of government, and widespread public dissent show there is no community acceptance for an incinerator in Tarago.

Tarago (Southern Goulburn Mulwaree precinct) must be immediately removed from the EPA's Energy from Waste Infrastructure Plan as a permissible site to locate a waste incineration facility and the Environment Operations (General) Regulation 2022 be amended accordingly to reflect this.

¹¹ *Facts about "waste-to-energy" incinerators*, GAIA (Global Alliance for Incinerator Alternatives), 2018.

¹² *NSW Electricity Infrastructure Roadmap*, NSW Department of Planning, Industry and Environment, Nov 2020
<https://www.energy.nsw.gov.au/sites/default/files/2022-08/NSW%20Electricity%20Infrastructure%20Roadmap%20-%20Detailed%20Report.pdf>

¹³ *National GreenPower Accreditation Program: Program Rules*, Version 10.2, 2021
<https://www.greenpower.gov.au/sites/default/files/2021-05/GreenPowerProgramRules-Version10.2%20FINAL.pdf>

All other identified energy from waste precincts be removed as permissible sites until a detailed and transparent review is undertaken demonstrating social license for such infrastructure exists at those locations and that it would not constitute unacceptable cumulative impact on those communities based on existing and historical developments.

6 – Regulatory Frameworks Will Not Protect Communities From Harm

The NSW Government including the EPA and Department of Planning assert through the energy from waste framework and relevant policy documents that human and environmental health can be protected through the framework and by implementing ‘international best practice’ emissions standards.

The lived experience of the Tarago community over the last two decades demonstrates that this simply isn’t true. Government regulation, rules and license conditions do nothing to protect the community or prevent harm. Licence conditions imposed on Veolia by the EPA for their existing landfill operations in Tarago have had no effect on reducing negative impacts on the surrounding community. Veolia have breached their licence conditions for 19 out of the 20 years they have operated in Tarago¹⁴, regularly fail to meet reporting requirements and withhold information from the community. While fines are sometimes issued for these breaches, they amount to petty cash for multi-billion dollar international corporations such as Veolia. When the EPA catch them breaking the rules, they pay a fine and move on, while the behaviour continues and the local community is left with the consequences.

Frameworks and ‘best practice’ standards are meaningless without effective enforcement of regulations. Until the NSW Government implements appropriately resourced compliance and enforcement capability, sanctions that deliver a deterrent effect, and demonstrate a willingness to cancel licences and close down facilities who breach the rules, the regulatory framework will fail to protect the NSW community and environment from harm.

Conclusion

The EPA’s proposals, under the guise of managing Sydney’s waste growth, will result in:

- Irreversible harm to regional communities;
- Worsening public health outcomes;
- Increased climate and toxic pollution;
- Displacement of more sustainable waste practices; and
- And further erosion of public trust in environmental governance.

The people of Tarago—and NSW—deserve a cleaner, healthier and more just future, not one built on burning waste and burning trust.

CATTI calls on the NSW EPA to immediately:

- 1. Conduct a more genuine, critical and transparent review of the need for waste incineration within NSW backed up by independent research and analysis which is fully transparent and consulted with the public.**

¹⁴ Summary Licence No: 11436 Veolia Environmental Services (Australia) Pty Ltd Woodlawn Landfill, NSW EPA, <https://app.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=11436&option=licence&range=POEO%20licence&searchrange=>

2. Provide an opportunity for members of the public to hear directly from the EPA and ask questions of the review – particularly those in regional NSW who will be directly impacted by this policy.
3. Update and amend all relevant policy and framework documentation to acknowledge and reflect that waste incineration does not form part of a circular economy and in fact works counter to such a system.
4. Incorporate a detailed and transparent review of human health and environmental impacts of waste incineration into its review of the energy from waste framework. This must include genuine consultation with the public and be conducted by scientific experts in the field of environmental science and human health – not engineers or experts linked to the waste industry.
5. Immediately cease incorporating, and remove all existing, false and misleading claims that waste incineration can deliver positive outcomes for the community and environment from energy from waste framework documents.
6. Remove Tarago (Southern Goulburn Mulwaree precinct) from the EPA's *Energy from Waste Infrastructure Plan* as a permissible site to locate a waste incineration facility and the Environment Operations (General) Regulation 2022 be amended accordingly to reflect this.
7. Remove all other identified energy from waste precincts as permissible sites until a detailed and transparent review is undertaken demonstrating social license for such infrastructure exists at those locations and that it would not constitute unacceptable cumulative impact on those communities based on existing and historical developments.

Yours sincerely,

Rod Thiele

President

Communities Against The Tarago Incinerator (CATTI) Inc

notaragoincinerator@gmail.com

www.notaragoincinerator.com