

NSW Energy from Waste Framework Review

Reasons to oppose this review and waste to energy incineration in NSW

No justification for the policy: Despite claims by the NSW government, waste to energy incinerators will not meet *International Best Practice Standards* for a range of pollutants or monitoring frequencies as defined in the NSW Chief Scientific Officers report. Heavy metal and fluoride pollutants do not meet these standards. A range of known pollutants are not even included for regulation, such as PFAS, Microplastics and Brominate Dioxins. While there are safer and more effective technologies to manage residual waste, waste to energy incinerators should not be promoted by the NSW government. Protection of public health, our environment and climate should be prioritised ahead of the waste to energy incineration industry.

New locations nominated : The nomination of the old Wallerang power station together with the West Lithgow precinct, is located close to residents, significant water bodies and the Wollemi and Blue Mountains national parks. The area's historical fossil fuel plants should not be a justification for introducing even dirtier forms of energy. Similarly, Tomago Newcastle is located close to sensitive natural environments, including wetlands and residential areas. Southern Goulburn and Parkes remain inappropriate due to the threat incineration poses to agricultural industries and significant natural environments. These communities deserve a clean energy future where their air quality is not compromised with dangerous incineration pollution and toxic ash. Waste to energy incineration is more polluting per unit of energy than coal, oil and gas. Refuelling old power stations with waste is worse for our climate, environment and health and represents a regressive energy policy at a time when renewable energy is more viable and supported by the community.

Expanding the definition of thermal processes: Technologies such as gasification and pyrolysis are also incinerators, despite being labelled as chemical or advanced recycling projects. Plastic is a fossil fuel-based material that when thermally treated whether to make energy, fuel or chemicals creates dangerous pollution, fire and explosion risks and keeps a linear economy for the plastics industry. NSW needs a clean, safe Circular Economy that doesn't increase the hazards associated with plastic waste. Expanding the definition under this policy to include gasification and pyrolysis technologies, the use of Refuse Derived Fuels (compressed residual waste) by other industries or the production of so called "Sustainable Aviation Fuels" from plastic waste is a dangerous pathway to increased climate and toxic air pollution as well as significant human health risks.

Replacing LNG with waste: Burning waste for energy creates twice as much climate pollution than using gas. Therefore, this recommendation makes no sense. In addition, burning waste for energy creates significant volumes of toxic air pollutants and highly hazardous waste ash. Combustion based industries should be encouraged to move to renewable energy sources and away from all fossil fuels, including residual waste which is predominantly mixed plastic wastes.

Make a submission: Send your submission to the NSW government via their online survey:

<https://yoursay.epa.nsw.gov.au/nsw-energy-waste-framework-review>

or by email to: energyfromwaste@epa.nsw.gov.au

For more information: www.toxicsfreeaustralia.org.au and www.zerowasteaustralia.org.au

Our new report can be found here.