



# Eastern Creek Energy from Waste

Independent Planning Commission Presentation

# Summary of what we will cover

- Our submissions to date
- Our energy from waste experience
- Our reasons for recommending refusal
  - Director-General requirements
  - Parliamentary Inquiry
  - community concerns
  - projected emissions
  - waste management gaps
  - issues identified by our environmental consultant
  - issues not addressed in the applicant's Response to Submissions on amended EIS
  - prohibited development.

# Our submissions to date

- Council has been a key stakeholder in the assessment of the State Significant Development (SSD) application lodged with the Minister for Planning by The Next Generation NSW Pty Ltd for a 3 lot subdivision, roadworks and construction of an Energy from Waste facility in Honeycomb Drive, Eastern Creek.
- We have provided detailed submissions on the:
  - development of the Director-General's requirements in 2013
  - initial EIS in 2015
  - amended EIS in 2017
  - Parliamentary Inquiry in 2017
  - Response to Submission in 2018.

# Our energy from waste experience

- In 2016 Council sent a technical delegation overseas to visit and understand how comparable facilities work and understand the state-of-the-art environmental controls and safeguards that must be put in place.
- The delegation toured 4 facilities in the UK to gain a balanced understanding of the complexities of these types of facilities from the perspective of the operator, the regulator and representatives of the communities where these plants are located.

# Our energy from waste experience

- Following the technical tour Council called on relevant Ministers to hold a commission of inquiry into the controls and regulation for energy from waste plants. This was to ensure the best possible outcomes in relation to:
  - the planning and design of the plants
  - managing the operation of energy from waste plants
  - the proprietorship of, the governance of, and the ownership and operation of the plants with particular reference to past environmental record and/or prosecutions
  - the ability of the plants to adapt to changes in best practice design and operation over time
  - impact and changes to energy from waste plants based on government recycling targets.

# Our reasons for recommending refusal

- The application does not meet the Director General's Requirements.
- The findings from the recent parliamentary inquiry into Energy from Waste were not considered.
- There is no social licence for the proposal and there are significant and valid community concerns.
- We have strong concerns about the projected emissions.
- There are significant waste management gaps in the information provided.
- There are significant unresolved issues as identified by our environmental consultant.
- There are issues that have been overlooked and not addressed.
- It is a prohibited development.

# Director-General's requirements

The key Director-General Requirements that have not been met are:

- refusal of the applicant to consider alternatives
- lack of justification for the development
- no public interest
- lack of commitment to a proper risk assessment.

# Parliamentary Inquiry

- The NSW Parliamentary Inquiry into Energy from Waste released on 28 March 2018 supports our concern for the proposed energy from waste at Eastern Creek.

## Recommendation 20

76

That, subject to the current assessment process being conducted by the NSW Department of Planning and Environment, the NSW Government not approve the energy from waste facility proposed by The Next Generation at Eastern Creek.



# Community concerns

- There is no social licence for this proposal. There is significant and valid community concern.
- Blacktown City Council hosted a joint community information forum with the proponent on 6 February 2017 in Minchinbury. Community members strongly expressed their health fears and environment concerns with this proposal and it was evident that the Blacktown community, in particular Minchinbury residents, do not want this proposal to go ahead.
- The next slide illustrates why.



Minchinbury

500 metres

Proposed energy from waste facility

# Community concerns

- The applicant failed to deliver any form of meaningful engagement.
- Public concern has become most evident as about 1,000 public objections to the proposal were received by the NSW Department of Planning and Environment.
- Despite the assurances from the proponent that there has been adequate community consultation, the opposition and pressure from the community continues to mount.

# Community concerns

- Community members also expressed concerns with the validity of the proposal as a solution to waste disposal.
- In January 2017 the European Parliament concluded that:
  - Energy from Waste technology is being phased out for a circular economy.
  - Energy from Waste facility in the waste hierarchy can significantly discourage recycling and resource recovery.
  - Increasing waste prevention, reuse and recycling are key objectives of a circular economy which aims to slow, close and narrow material and energy loops.
  - Waste incineration sits at the bottom of the waste hierarchy, along with landfilling it is the least favourable options for reducing greenhouse gas emissions.
  - Care must be taken to avoid the creation of an overcapacity of non-recyclable waste. We need to ensure Energy from Waste does not create infrastructure barriers to the achievement of higher recycling rates.

# Projected emissions

Pollutant	The Next Generation Easter Creek	The Next Generation Eastern Creek	The Next Generation Eastern Creek	North London Heat and Power Project – Islington Council
	RTS Updated report	Amended EIS	Initial EIS	(Expected emissions under normal operation)
Solid particles /Dust/ Particulate Matter (mg/m <sup>3</sup> )	1	1	22	1
Nitrogen dioxide NO <sub>2</sub> (mg/m <sup>3</sup> )	120	188	286	10-25
TOC (mg/m <sup>3</sup> )	.015	.015	14	1
Dioxins and furans (ng/m <sup>3</sup> )	.01	.01	.01	.005-.01
Hydrogen Chloride HCL (mg/m <sup>3</sup> )	9	9	43	6
Cadmium Cd (mg/m <sup>3</sup> )	.009	.009	.04	.001
Mercury Hg (mg/m <sup>3</sup> )	.004	.004	.04	.008
Sulphur Dioxide SO <sub>2</sub> (mg/m <sup>3</sup> )	27	27	143	20
Hydrogen Fluoride HF (mg/m <sup>3</sup> )	.5	4	3	0.5
Carbon Monoxide CO (mg/m <sup>3</sup> )	23	23	71	10



# Projected emissions

- This is one of the reference facilities we visited in the UK.
- Photo illustrates the scale of the plant which is a 1/2 of the size of the one being considered



## Waste management gaps

- We have concerns about the applicants ability to adequately sort the waste to remove hazardous material.
- This concern was supported by the Department who consider that the applicant has “not adequately demonstrated how wastes that have the potential to generate harmful toxics will be excluded from the waste stream” – Page 11 of Planning Report
- The EPA have gone a step further and declared that floc waste is potentially hazardous. The department agree with this.

# Waste management gaps

Runcorn Energy from Waste - Manchester



Aarhus Energy from Waste - Denmark





## Issues identified by our environmental consultant

- The use of an air cooled condenser is not best practice.
- The lack of odour management during a facility shutdown.
- No confirmation of facilities that can accept Air Pollution Control residues.
- Treated timber is stated to be both in and excluded from the feedstock.
- Low frequency noise assessment from air cooled condensers lacks detail.

# Issues not addressed in the applicant's Response to Submissions to the amended EIS

- 21 of our concerns were not addressed by the applicant in the Response to Submissions.
- These included the need to address:
  - baseline data
  - community concern
  - sorting processes
  - technology used
  - foreign objects
  - architectural design
  - human health concerns.

# Prohibited development

- Council previously noted that ‘Electricity generating works’ are prohibited in the IN1 General Industrial Zone, except when the zone objectives can be satisfied.
- The urban design objective of the IN1 General Industrial zone still has not been met. On this basis, as the design has not improved, we believe the development is prohibited.

# Our position is strongly supported

- There are many similarities between our concerns and the submissions made by other agencies on the proposed facility, including:
  - NSW Department of Planning and Environment
  - NSW Health
  - NSW Environment Protection Authority
  - Penrith City Council

# Concluding statements

- We do not want a compromised solution for our City.
- **The development application must be refused.**
- Approving the facility will condemn residents, their children and future generations to dangerous and harmful health impacts.