

SUBMISSION REGARDING PROPOSED EASTERN CREEK ENERGY FROM WASTE FACILITY PROJECT

I, like thousands of other local residents, am strongly opposed to this project and I strongly urge you to heed the recommendation of the NSW Department of Planning (DOP) and flatly reject this project. My reasons follow.

Background

This proposed project was brought to the public's notice well over five years ago. Since that time the proponent has attempted to have his proposal (with subsequent revisions) approved several times, without success.

The latest opposition/rejections have been from a NSW upper house inquiry (inquiry) in March 2018 and the DOP in April 2018. In short, the proponent, despite having been afforded numerous opportunities to do so, has failed abysmally to convince the relevant approval authorities of the efficacy and safety of its proposal, even with revisions.

Recent Findings

The inquiry found that the community engagement by the proponent of the proposal did not come within "a bull's roar" of best practice and was "pretty close" to worst practice. The NSW Environment Protection Authority (EPA) has serious misgivings about the "thoroughness and veracity" of the human risk assessment of the proposal, a damning indictment on the proponent's efforts to address and mitigate safety concerns and risks.

The DOP concluded that the proposal was inconsistent with the EPA's energy from waste policy statement (2015), namely,

- Mass burn disposal outcomes are avoided
- Air quality and human health are protected
- Higher value resource recovery outcomes are maximized
- Scope is provided for industry innovation
- Community acceptance to operate a process can be obtained (our community survey of 1200 people proves 98.5% of the community are against a waste to energy incinerator);

and the air quality impacts and risk to human health were unknown, an alarming finding, given that the proposal is within 800 metres of homes, schools and sporting amenities.

The EPA has also rightly raised concerns that the proposal would lead to an undermining of its recycling policies, as the incinerator would require large quantities of building and

household waste to fuel it – there would definitely be less incentive to recycle. This concern is compounded by the fact that China is no longer accepting Australian waste. It's a fallacy to think that this type of energy from waste facility is a renewable energy source and therefore, an environmentally acceptable substitute or supplement to recycling.

Proponent's Contentions

The proponent has argued that this sort of waste-to-energy generation project is common throughout Europe and Scandinavia and is operated safely. In fact, the opposite is true, as all around the world there are many accidents with waste to energy incinerators. Resulting in fires, explosions, and even death to workers.

Here are just some instances:



- 5/10/2016 Explosion at Waste to Energy Incinerator results in two employees critically injured <https://www.kxly.com/news/local-news/spokane/waste-to-energy-plant-accident-victims-remain-in-critical-condition-20161121034342721/176401413>
- 9/08/2017 One man died and two others were critically injured, after an explosion at a waste to energy plant in West Midlands town of Oldbury <https://resource.co/article/man-dies-after-oldbury-recycling-plant-explosion-12022>
- 29/02/2016 Explosion and fire at Waste to Energy Incinerator in Belgium <https://www.endswasteandbioenergy.com/article/1385497/explosion-fire-efw-facility>

- 8/06/2017 Eleven hospitalised after an uncontrolled release of a cloud of Lime at Waste to Energy Incinerator in Dublin <https://www.irishtimes.com/news/ireland/irish-news/eleven-hospitalised-after-incident-at-dublin-s-poolbeg-incinerator-1.3112097>
- 20/01/2013 An energy from waste plant in Scotland was closed down after an explosion and for releasing cancer-causing dioxins up to two-and-a-half times permitted levels http://www.heraldscotland.com/news/13088864.Pioneering_waste_plant_faces_legal_action_after_pollution_leaks_and_an_explosion/
- 2/12/2012 Fire at Waste-to-Energy Incinerator in Panama City, Florida. <http://rapperport.com/case-studies/waste-to-energy-incinerator-fire>
- 16/09/2016, a fire in the waste incinerator bunker caused poisoning of one person by hazardous fumes. <https://www.presseportal.de/blaulicht/pm/116234/3431946>
- 23/01/2013 Waste to energy incinerator in Kocaeli burned down. One of the firemen had to be hospitalised, the others were medically treated because they inhaled toxic exhalations during the fire fighting. <https://www.memurlar.net/haber/331644/>
- Fire at Crymlyn Burrows Giant Incinerator where houses nearby and downwind were contaminated by dioxin <http://ukwin.org.uk/2010/02/14/another-fire-at-crymlyn-burrows/>
- Many more Waste to Energy Incinerator accidents listed on this interactive map <http://english.arnika.org/ipen-cee/waste-incinerators-accidents>

What the preceding case studies illustrate is that Australia is in a position to learn from the mistakes of other countries after decades of them using incineration. Europe is now turning away from incineration due to safety and air pollution concerns.

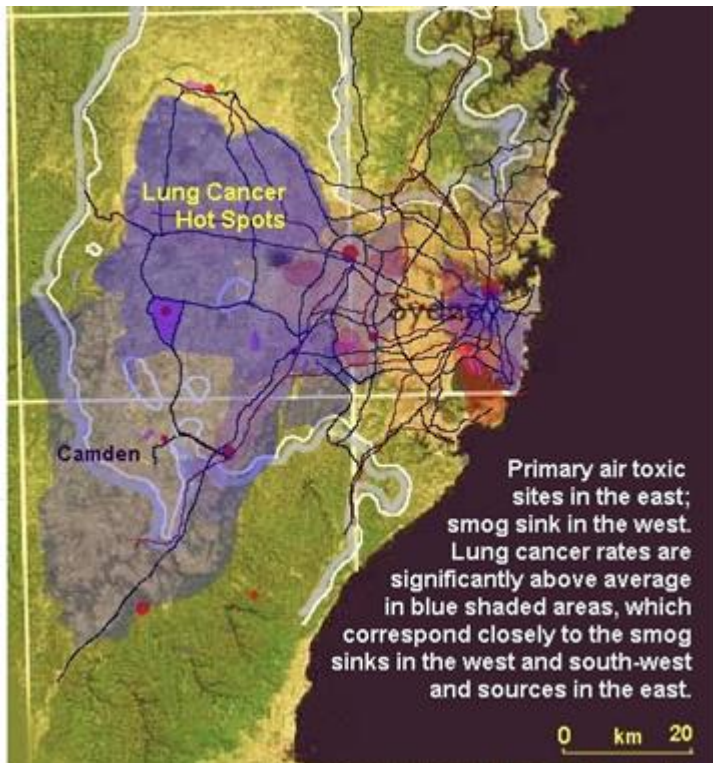
The proponent, despite having been given more than ample opportunities, has not been able to demonstrate that he will be implementing any controls and safeguards as regards the nature of the waste to be burnt, thereby failing to guarantee that toxic materials are not accepted and burned by his facility and in doing so has failed to come up with a robust and coherent case for the safety of his proposal and has merely made a series of ambit claims supported by a dearth of facts or research. Given this, I am surprised that this proposal has lasted this far.

The track record of the proponent is also a great cause for concern. Consequently, he doesn't meet the fit and proper person test under section 83 of the Protection of the Environment Operations Act. The proponent has had 18 EPA breaches of associated companies since 2005. Averaging at over 1 breach per year. The proponent has thus contravened environment protection legislation making him an unfit person.

Conclusion

The proposal represents a very bad idea that has very little, if nothing going for it and should have been knocked on the head a long time ago. There are grave safety/public health concerns and it is bad for the environment.

I should also poignantly add that lung cancer rates are significantly higher in the region around the proposed site of the incinerator, as attested by the image below. This disparity will only be exacerbated were this proposal to go ahead. My late wife succumbed to non-smoker's lung cancer in 2015 and my daughter to the complications of cancer in 2016.



Therefore, I implore you to endorse the recommendation of the DOP and flatly reject this insidious proposal.

Michael Pride

Concerned Erskine Park Resident

8 May 2018