



Locked Bag 3, Orbost
Victoria 3888 AUSTRALIA
eeg@eastgippsland.net.au
ABN: 30 865 568 417
www.eastgippsland.net.au

6th July 2018

Comments on application for waste to energy incinerator by Nippon's Australian Paper mill



EEG has serious concerns over the proposal for a toxic waste incinerator that would double as alternate electricity generation to power the Maryvale Pulp and paper mill.

Below is a summary of the many concerns for both community and the environment.

False claims and poor accounting

- A waste incinerator to burn Melbourne's rubbish would become totally reliant on the continued operation of this controversial pulp and paper mill and its access to an ever diminishing forest resource.
- Classifying incineration as 'green' or 'renewable' energy creates new revenue streams for the industry because operators would benefit from government programs and assistance designed to promote non-fossil fuel generated power. Incineration should not be given any environmental credibility. It is at odds with all current science and research.
- Business and governments should accept that burning waste in any form and by any name is a false path to reduce waste and undermines true sustainability and efforts to reduce climate impacts.
- The unproven claims being made by the proponents of the plan and its lobbyists have already raised alarm bells for many people.

- The claim that toxic and inappropriate rubbish such as batteries, asbestos, globes and hazardous waste will be picked out before incineration, cannot be taken seriously.
- No EES and no scrutiny of Nippon's claims is shameful, but telling.

Toxic pollution

- Communities locally and in the areas of smoke drift would be subjected to ongoing toxic emissions and associated health impacts for years to come.
- The impacts could be comparable to those from a coal fired power plant because of their effect on the lungs and heart.
- Published report from Epidemiology 2013 - [Air Pollution from Incinerators and Reproductive Outcomes](#) - A Multisite Study
- The carcinogenic dioxins that escape from high temperature incineration should be a major concern to local authorities, the EPA and the state government. They include emissions of small particulates (PM 2.5 and PM 10), hydrogen chloride, hydrogen fluoride, dioxins and heavy metals.
- A cocktail of atmospheric pollutants in the valley could increase the impacts exponentially.
- It is estimated that the incinerator will generate up to 150,000 tonnes of hazardous ash waste per year. The disposal or storage of this is also of huge concern and will be a burden on government and we assume ultimately tax-payers.
- A [NSW Parliamentary Inquiry](#) recently recommended against a proposal for a waste incinerator in greater Sydney due to overwhelming concerns of mixing an incinerator in a populated area.
- In the US 300 planned incineration facilities have been abandoned because of their long-lasting negative effects on people's health, atmospheric and soil/agricultural pollution, increased carbon emissions, destruction of valuable recyclables, and the economic burden of ongoing maintenance and waste disposal over the years.
- The ACT has also rejected incineration as a method of dealing with waste, [questioning](#) claims made by the proponent and recently [halted the plan](#). It is now looking at safer methods of waste disposal.
- Our atmosphere is NOT a new convenient "landfill". It is claimed that 20 to 30% remain as toxic ashes after incineration. The rest goes into our air – and lungs.
- There is no such thing as 'clean coal', 'peaceful war' and no such thing as 'clean energy incinerators'.
- The [National Toxics Network's report](#) on waste incinerators also exposes the myths around claims made by industry:

The incinerator industry is now compelled to make claims that the electricity it produces is renewable and green to attract subsidies and credits for 'green' energy. It is unlikely that the industry would be able to remain financially viable in any sense unless they can

access these funds. However, regulators and legislators are taking a closer look at these claims in some countries and exposing the false nature of these arguments” and “Renewable energy subsidies for waste incinerators should be reviewed and revoked. Waste incineration should be discouraged at all levels of governance as a poor solution to waste in the 21st century. The priority should not be approving ‘end of pipe’ solutions, but rather focusing on waste avoidance, reuse and recycling.

It cites many credible references; too many to include here.

Govt obligations

- There must be a thorough EES into this project.
- Under the Environment Effects Act 1978 it states that:
a project should be referred in its entirety wherever possible, including any ancillary works or later project stages essential to the project’s operation.
Fiddling with words and definitions cannot escape this requirement.
- At a time when the Victorian government is developing a [Clean Air Plan](#) it is also openly supporting this solution for its waste disposal problem. This shows extreme insincerity, hypocrisy and even deviousness.
- Project stakeholders list MUST include other interest groups and experts in the many issues of concern – such as env, or toxic emissions experts and respiratory health specialists. The current list is overly represented by industry, development and local authorities involved in the same.
- Regulations and even legislation does not equal compliance. Historically and more recently, AP has been shown to have breached many of its licence conditions.
- Nippon’s AP might be supported by the CFMEU and the government but its social licence is almost nil.
- We understand that the EPA and state government have no credible guidelines or standards for waste incinerators yet appear to be facilitating the project with \$2.5M feasibility funding. Alarm bells ring.
- Despite enormous unresolved impacts of toxic air pollution, absence of regulation, compliance history and toxic waste disposal, the government has deemed AP’s proposal need not go through an Environmental Effects Assessment. This is staggering.
- The Planning Minister seems to base this decision on the proponent’s say-so. This is not a responsible method of decision making.
- This complicity and early government support to clear the path for approval is totally unacceptable to voters.
- As Victoria’s population grows unchecked, and as there has been limited planning for more people-pressure on many levels, quick-fix, industry-promoted solutions should not be embraced for political expedience.
- A responsible government should be considering other waste reduction solutions that are progressive, rather than pandering to a major industry,

owned by an overseas company, which has shown few scruples or concern for community or environment.

- While AP investigates renewable energy options, the government should be considering other opportunities to reduce waste, including mandatory extended producer responsibility and product stewardship programs.

Alternatives

- The estimated \$600M cost could instead be invested in a massive solar plant. The [Port Augusta Renewable Energy Park](#) – providing 375MW is to be built at a cost of \$600M. *'Once the energy park is completed, it is expected to generate up to 1,000GWh of electricity annually – enough to power approximately 200,000 South Australian homes each year.'*
- The recently approved [Maffra solar farm](#) is estimated to cost \$40M.
- Nippon has not properly investigated renewable energy and storage options but has superficially dismissed it as an option.
- There are many world experts who should be consulted or engaged to review any claims made in AP's proposal. This is the very least that should happen. Voters expect any decisions should be informed by credible independent experts. These could include Professor Paul Connett, author of [The Zero Waste Solution](#), or Jane Bremmer from the [National Toxics Network](#).
- Scientist, Paul Connett is leading efforts to help communities deal with their waste in sustainable ways—in other words, to eliminate and reuse waste rather than stow it away in landfills or convert it into atmospheric pollution.
- [Environment Victoria has this week shown](#) that Victoria currently has 1585 MW of operating large-scale wind and solar energy projects, with another 2518 MW under construction or financed. With the average Victorian household estimated to consume 3865 kWh of electricity annually, calculations show these projects will generate more than enough electricity to power the equivalent of all 2.5 million homes in Victoria.

Community

- This [consensus statement](#) against waste incinerators is signed by many groups internationally and within Australia. It cites many references.
- The public has little to no faith that when any emission standards or conditions are established, they will be adhered to.
- Our taxes must never be used to subsidise a cent of this project. This has been a major negative of overseas incinerators. It is an enormous financial burden on governments and the tax-payers. The \$5M towards Nippon's feasibility study is already a very negative investment.

EEG would recommend that AP properly investigates renewable energy options. The government should also be considering long term, climate friendly, non-polluting opportunities to reduce waste. This should include mandatory extended producer responsibility and product stewardship programs.

We would like to see real community involvement, as well as thorough investigations by independent experts of air pollution and climate impacts, health risks and long term economic costs, not simply the incineration industry's claims. We are also deeply concerned that the development of such a facility would impact on recycling rates and become a disincentive to reduce waste.

The lack of policy, the very real likelihood of breaches of any conditions, the widespread and ongoing impacts on community health, the waste of tax-payers money, the environmental damage to both the climate, atmosphere and the critically endangered Mountain Ash forests, must not be a secondary consideration. Lip service or PR will not placate the community.

An incinerator with a 'green' cloak may appear an easy solution to Melbourne's mounting rubbish problem while assisting Nippon Paper to reduce its energy costs, but it undermines the potential for a progressive approach to solve both problems. The 'new economy' solutions are there, ready and waiting.

EEG strongly advocates for more thoughtful, cost effective and publicly acceptable solutions



Jill Redwood
Coordinator
(03) 5154 0145

