

The Hon Simon O'Brien MLC, Chair,  
Standing Committee on Environment and Public Affairs  
Parliament House

Dear Chairman,

**Petition #58 "Alternatives to burning waste"**

Thank you for the invitation to make a submission about this issue which I believe has the potential to set back true waste reduction in this State and to impose a further and unnecessary burden of pollution on our air and soil and a financial burden on councils.

The Hon Lynn MacLaren' MLC submission has dealt with Mandatory regulation of dioxins and furans, investigation of air quality in and around the Kwinana strip and evidence of successful initiatives in other places, including the City of Canberra. I affirm what the Hon Member has written, particularly her quotations from overseas, and will instead deal with other related issues which I request that the Committee include in its examination. Ample referencing has been provided to the EPA by submitters like Alliance for a Clean Environment and the National Toxics Network that balances the optimistic claims by New Energy (and Phoenix and Covanta for the second proposed plant) so I will not repeat them here but I urge the committee to take the mass of questions about incineration posed there seriously. The academic paper at <http://www.ipen.org> pollution issues from incinerators in eight countries.

**1. Informed local residents overwhelmingly do not want their waste burnt.** Five volunteers in the City of Rockingham took this petition door to door in the suburb of Hillman. Of residents contacted, 95% were concerned at the proposal to build two incinerators within 7 kms of their houses and were keen to sign. Some who refused to sign did so because they were disillusioned with decision-making processes. Volunteers in the City of Kwinana have found the same there with another petition soon to be presented to the Legislative Assembly. This is an unprecedented response rate. From conversations it was clear that residents have little confidence in the EPA assessment process and little faith that decision-makers are independent of vested financial interests.

Given that the Mayor of Stirling has come out enthusiastically promoting an incinerator for his City, I expect that the result in Stirling would be the same if people were presented with more complete information than what they get from brief advertisements and few articles in local papers which these days often do not get delivered.

**2. The EPA and the Department of Health have failed to conduct a sufficiently thorough process.** We know from medical practices and research that exposure of organisms to multiple drugs increases effectiveness: multiple antibiotics and anti-cancer drugs are routinely prescribed for certain conditions. Yet, when it comes to considering the exposure of humans to the more than 20 pollutants admitted by operators to be produced by incinerators, all the regulators do is restate that none of the recorded pollutants separately exceeds prescribed limits. This deficiency is a separate issue from the concerns expressed by the Hon Lynn MacLaren regarding accumulation over time of the most serious emissions, dioxins and furans. It is relevant to note that, in the context of pollution in Cockburn Sound, the EPA for the first time raised the issue of cumulative impacts of several projects. The EPA's failure to at least raise the possibility of two incinerators within 5kms of each other is a serious dereliction. Although I met with the Office of the Appeal Convenor, this issue of the impacts of exposure to multiple pollutants still goes unaccounted for. Insufficient research evidence to establish limits is not a responsible reason to avoid dealing with this problem. The application of the EPA's first principle, the Precautionary Principle, appears to have been nullified

due to the insertion of the clause dealing with practicality - in other words if the proponent won't deal with an issue, there EPA is let off the hook.

**3. Causes for the abysmally low level of recycling in WA need to be examined before we rush to burning.** Our call is for the government to examine the whole waste process beginning with production, consumption and including pre-sorting by residents BEFORE permitting the burning. Rockingham has a strategy but recycling has dropped to 0.9%. The Mindarie Regional Council produces compost that is so polluted by glass shards and other chemical pollutants that it cannot be sold commercially. To use the low level of recycling as a justification for incineration certainly suits the proponents of incineration but that is not a logical approach. Yet with vision and serious commitment it could be so different.

**4. The recent educational visit undertaken by WALGA and councillors from some cities has been afflicted by mis-information and lack of balance.** One Mayor said there was no smell so it must be ok: did he not know that dioxins are odorless? Was the feedstock managed in the days before the visit? Was information about the known levels of dioxins in Japan's soils given to the visitors? Why was there an uncritical approach treating Japan and Australia as if they were comparable in managing waste when clearly they are not (ratios of population to land area, social discipline for example)? Why did not the same tour take in other more comparable examples of cities managing their waste successfully, for example, Canberra, San Jose and San Francisco with recycling levels of over 70%? One can understand the urgency of inner city councils faced with rising costs of transporting waste to distant landfills in other council areas but the rush to burn waste is not warranted. The recent enthusiasm of the State Government and some councils for burning waste has a shakey basis.

**5. There are inherent risks from 'put or pay' contracts to residents' hip pockets or even council's financial viability.** There is evidence that a number of councils in the US where this kind of contract has been common are facing difficulties in meeting commitments for quantum and quality of Municipal Solid Waste. The City of Kwinana has apparently signed a contract to deliver its waste to the New Energy plant for twenty years. While it is understandable that builders of incinerators need certainty of supply, evidence needs to be gathered that shows that such contracts do not disadvantage local councils and do not neutralise communities' efforts to reduce, reuse, recycle before contracts are considered. It is known that the Kwinana decision was not open to public scrutiny. To date there has been no evidence that any other Council has committed waste to either incinerator.

I state that I am not aware that any of these issues has been taken to the Parliamentary Commission for Administrative Investigations.

Yours sincerely

James Mumme

20 October 2014