



Preamble

Submission to
The Legislative Council of Victoria
Economy and Infrastructure Committee
“The development and expansion of waste-to-energy (WtE)
infrastructure in Victoria”

Link

See <https://www.parliament.vic.gov.au/wastetoenergyinquiry#terms>

Caveats

1. Nothing in this submission is confidential.
2. This submission is an expression of the opinions of “No Waste Incinerators in Lara & Greater Geelong Incorporated” (NWIL&GG Inc.), in good faith.
3. This submission is not copyright.
4. The Inquiry is welcome to make our submission public.
5. We would appreciate the opportunity to testify to the Parliamentary Inquiry.

Acknowledgements

We are grateful for all the wonderful campaign work done by our volunteer members and supporters. We have many partners. Their expertise and wisdom are greatly appreciated.

Address for correspondence

Charles (Chaz) Street

[Redacted]

Secretary and Science Advisor

No Waste Incinerators in Lara & Greater Geelong Incorporated

[Redacted]

[Redacted]

[Redacted]

www: <https://nowasteincinerators.org/>

FB: <https://www.facebook.com/groups/saynolarabigincinerator>

Table of Contents

Content	Page
1. Terms of Reference	3
2. Introduction	4
3. Executive Summary	5
4. Scope	6
5. Definition	6
6. Our response to the Terms of Reference	7
a) the suitability of existing WtE infrastructure plans and policies	7
b) the impact of WtE projects on residential communities and transport	7
c) annual caps on waste that can be used in thermal WtE processing	30
d) regulatory framework to establish and manage WtE facilities	32
e) separating recycling and organic material from WtE streams	33
f) nature and management of emissions, waste and ash byproducts	34
g) cost-benefit of WtE generation to consumers and businesses	37
h) alternative waste management approaches	43
i) adequacy of community consultation	46
j) other related matters	60
7. Recommendations	64
8. Conclusions	71
9. Address for correspondence	71
10. Terminology	72
11. Bibliography	73

Terms of Reference

“The development and expansion of waste-to-energy (WtE) infrastructure in Victoria”

On 27 August 2025, the Legislative Council agreed to the following motion:

That this House requires the Economy and Infrastructure Committee to inquire into, consider and report, by August 2026, on the development and expansion of waste-to-energy (WtE) infrastructure in Victoria, including —

- (1) the suitability of existing WtE infrastructure plans and policies, including –
 - (a) the impact of WtE projects on residential communities and transport infrastructure;
 - (b) annual caps on waste that can be used in thermal WtE processing;
 - (c) the regulatory framework to establish and manage WtE facilities;
- (2) the impact of WtE, including from –
 - (a) separating recycling and organic material from WtE streams;
 - (b) nature and management of emissions, waste and ash byproducts;
 - (c) the cost-benefit of WtE generation to consumers and businesses;
- (3) alternative waste management approaches and emerging technologies that also align with circular economy principles, having regard to the recommendations of the Environment and Planning Committee’s 2020 Inquiry into recycling and waste management and the role of WtE in the Victorian Government’s circular economy plan, including Victoria’s landfill management, capacity and strategy;
- (4) the adequacy of community consultation; and
- (5) any other related matters

No Waste Incinerators in Lara & Greater Geelong Incorporated

Introduction

Who we are

“No Waste Incinerators in Lara & Greater Geelong Incorporated” (NWIL&GG Inc.) is a not-for-profit volunteer community group based in Lara, Victoria, in the City of Greater Geelong.

We have no political affiliation, and we are devoted to the protection of public health, our environment, and the amenity of our homes.

We have been operational under other names since 2021, incorporating as “No Waste Incinerators in Lara & Greater Geelong Incorporated” in February 2024.

We are concerned about waste-to-energy (WtE) incineration because the large body of scientific evidence strongly suggests to us that no waste incinerator can be considered “safe” (114)

The scientific evidence also suggests to us that the toxic emissions from any waste incinerator can, in the long term, adversely impact every ecosystem and every population on planet Earth.

We are dedicated to the removal of the waste incineration threat from our town, our region, and beyond. In summary, we make recommendations aimed at achieving a permanent ban on the combustion of Municipal Solid Waste (MSW). In addition, we make recommendations regarding extra requirements if the combustion of MSW is to proceed, or continue, in any form.

We are grateful for the opportunity to lodge a submission to the “The development and expansion of waste-to-energy (WtE) infrastructure in Victoria” Parliamentary Inquiry (“the Inquiry”).



Executive Summary

The members of “No Waste Incinerators in Lara & Greater Geelong Incorporated”, were presented in 2021 with a 1900 page proposal from Prospect Hill International vaguely describing the installation of a huge waste incinerator in our town of Lara.

We found the proposal, even on the most cursory examination. to be so defective and bizarre that we naturally assumed it would be rejected by the authorities in short order.

We never imagined that Lara Big Incinerator would actually receive an EPA Development Licence.

Shortly after we found proposals for similar WtE facilities in Wollert, Sunbury, Hampton Park, with a more advanced proposal in Maryvale.

We also discovered a vast and rapidly growing body of scientific evidence regarding the harms of waste incineration in many places around the world.

Not since the trial of Galileo Galilei in 1633 by the Inquisition, have we seen so much good science so comprehensively dismissed into the dustbin of ignorance, by so many officials qualified to know better.

There is something rotten in the State of Victoria.

Our primary recommendations are:

1. That the incineration / combustion of Municipal Solid Waste (MSW) must be permanently stopped in Victoria and beyond, and that all policies and plans for the incineration of MSW must be formally and permanently halted.

Simultaneously, Victoria must vigorously increase its implementation of Zero Waste Solutions, focussing on

- Reducing consumption
- Re-use
- Recycling

2. There needs to be a high-level Commonwealth Royal Commission into the waste-to-energy industry in Australia, with Terms of Reference including;
 - a) The history of the industry
 - b) The involvement of serving and former political figures
 - c) Foreign involvement and investment
 - d) “Regulatory capture”, and
 - e) Probity

There is no time to waste.

Scope

Our Incorporated Association is opposed to the combustion of Municipal Solid Waste (MSW) in waste incinerators of all types.

Definition

Incinerator

When we use the term “incinerator”, it has the same meaning as “Municipal Waste Combustor” (MWC) as defined by the United States Environmental Protection Agency, as follows:

“Municipal waste combustor, MWC, or municipal waste combustor unit:

- (1) *Means any setting or equipment that combusts solid, liquid, or gasified MSW including, but not limited to, field-erected incinerators (with or without heat recovery), modular incinerators (starved-air or excess-air), boilers (i.e., steam-generating units), furnaces (whether suspension-fired, grate-fired, mass-fired, air curtain incinerators, or fluidized bed-fired), and pyrolysis/combustion units. Municipal waste combustors do not include pyrolysis/combustion units located at plastics/ rubber recycling units (as specified in § 60.50a(k) of this section). Municipal waste combustors do not include internal combustion engines, gas turbines, or other combustion devices that combust landfill gases collected by landfill gas collection systems.*
- (2) *The boundaries of an MWC are defined as follows. The MWC unit includes, but is not limited to, the MSW fuel feed system, grate system, flue gas system, bottom ash system, and the combustor water system. The MWC boundary starts at the MSW pit or hopper and extends through:*
 - (i) *The combustor flue gas system, which ends immediately following the heat recovery equipment or, if there is no heat recovery equipment, immediately following the combustion chamber;*
 - (ii) *The combustor bottom ash system, which ends at the truck loading station or similar ash handling equipment that transfer the ash to final disposal, including all ash handling systems that are connected to the bottom ash handling system; and*
 - (iii) *The combustor water system, which starts at the feed water pump and ends at the piping exiting the steam drum or superheater.*
- (3) *The MWC unit does not include air pollution control equipment, the stack, water treatment equipment, or the turbine generator set.” (123)*

Our response to the Terms of Reference

That this House requires the Economy and Infrastructure Committee to inquire into, consider and report, by August 2026, on the development and expansion of waste-to-energy (WtE) infrastructure in Victoria, including —

- (1) the suitability of existing WtE infrastructure plans and policies, including —**
- (a) the impact of WtE projects on residential communities and transport infrastructure;**

Evidence

Sections

- a) Performance of standard waste incinerators
- b) Dispersal of waste incinerator emissions
- c) Types of toxic particulate emissions
- d) Greenhouse gas emissions
- e) Public health impacts of waste incinerator emissions
- f) New and refurbished incinerators are safer than older ones. Yes ?

a) Performance of standard waste incinerators

We have studied the scientific literature regarding waste incinerators, particularly of the moving grate mass combustion type often mooted for Australia, and note the following;

The scientific evidence especially from Europe, demonstrates that these standard waste incinerators have been consistently contaminating adjacent landscapes and waterways with toxins, including;

- a wide range of Persistent Organic Pollutants, as listed under the Stockholm Convention (7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 25, 70, 72, 73, 74, 76, 85, 86, 87, 88, 89, 98, 99, 102, 109, 1010, 111, 114, 116, 118, 125, 127, 132, 131, 133, 136, 143)
- “forever chemicals” such as per- and polyfluoroalkyl substances (PFAS) (24, 26, 51, 53, 56), 78, 80, 91, 112, 118, 143)
- heavy metals such as mercury (Hg), lead (Pb), arsenic (As), and others (9, 10, 15, 16, 25, 40, 48, 55, 74, 69, 75, 84, 114, 116, 117, 118, 127, 136, 143)

We have yet to see evidence that combustion of Municipal Solid Waste (MSW) by gasification, pyrolysis and other variants, are superior treatment options to moving grate mass combustion technologies. Rather, we find that the evidence suggests to the contrary (21, 98, 105, 106)

b) Dispersal of waste incinerator emissions

Documented emissions from waste incinerators include;

- gas emissions to atmosphere
- ash from the bottom of the furnace (“bottom ash”)
- airborne particulates, “fly-ash”, and “smoke” usually expressed as “PM10” and “PM2.5”

The dispersal of incinerator emissions into the environment and communities is enabled by;

- wind
- water flows in the form of rivers (especially in times of flood), ocean currents (carrying contaminants from rivers and wastewater treatment plants), contaminated ground water, and irrigation with contaminated water
- migrations of contaminated animals by land, sea and air (26, 111, 132)

No Waste Incinerators in Lara & Greater Geelong Incorporated

- exports of contaminated food (114)
- water-insoluble halogenated airborne incinerator pollutants which land on a water surface, will sink to the bottom because they are more dense than water and sea water. There, they will enter the food chain, as benthic organisms process the sediment seeking nutrients (26, 111, 132).

The re-concentration of incinerator toxic emissions, especially of the fat-soluble types, is enabled by;

- bioaccumulation within an organism, from consuming contaminated food (26, 73, 74, 76, 97, 98, 101, 110, 124, 132)
- biomagnification up the food chain (26, 111, 125)

Logically, there can be no “safe level” of environmental toxins which tend to bioaccumulate and / or biomagnify.



No Waste Incinerators in Lara & Greater Geelong Incorporated

Wind as a dispersant of waste incinerator pollution

The stack (chimney) of a waste incinerator discharges a plume of gasses and particulates high into the atmosphere, allowing the wind to disperse the effluent over long distances.

Wind velocity maps, wind roses and Plume Plotter computer simulations are informative.



The stack of the Lara EfW facility is designed at 80 metres tall, amongst the tallest structures in Victoria outside the Melbourne metropolitan area (58).

We expect that particulates from Victoria's mooted waste incinerators would disperse on the breeze, and precipitate toxic particles on the surrounding landscapes and waterways over many kilometres, similar to the experiences of many incinerator sites in Europe and other places.

How far can incinerator particulate emissions travel? A very long way, it seems.



A study by Commoner et alia (2000) suggests that polychlorinated dioxin / furan particles could travel on the winds from all over the continental United States, and from as far as Mexico to Nunavut in the Canadian Arctic (32, 37).

How far could emissions from Victoria go?

No Waste Incinerators in Lara & Greater Geelong Incorporated

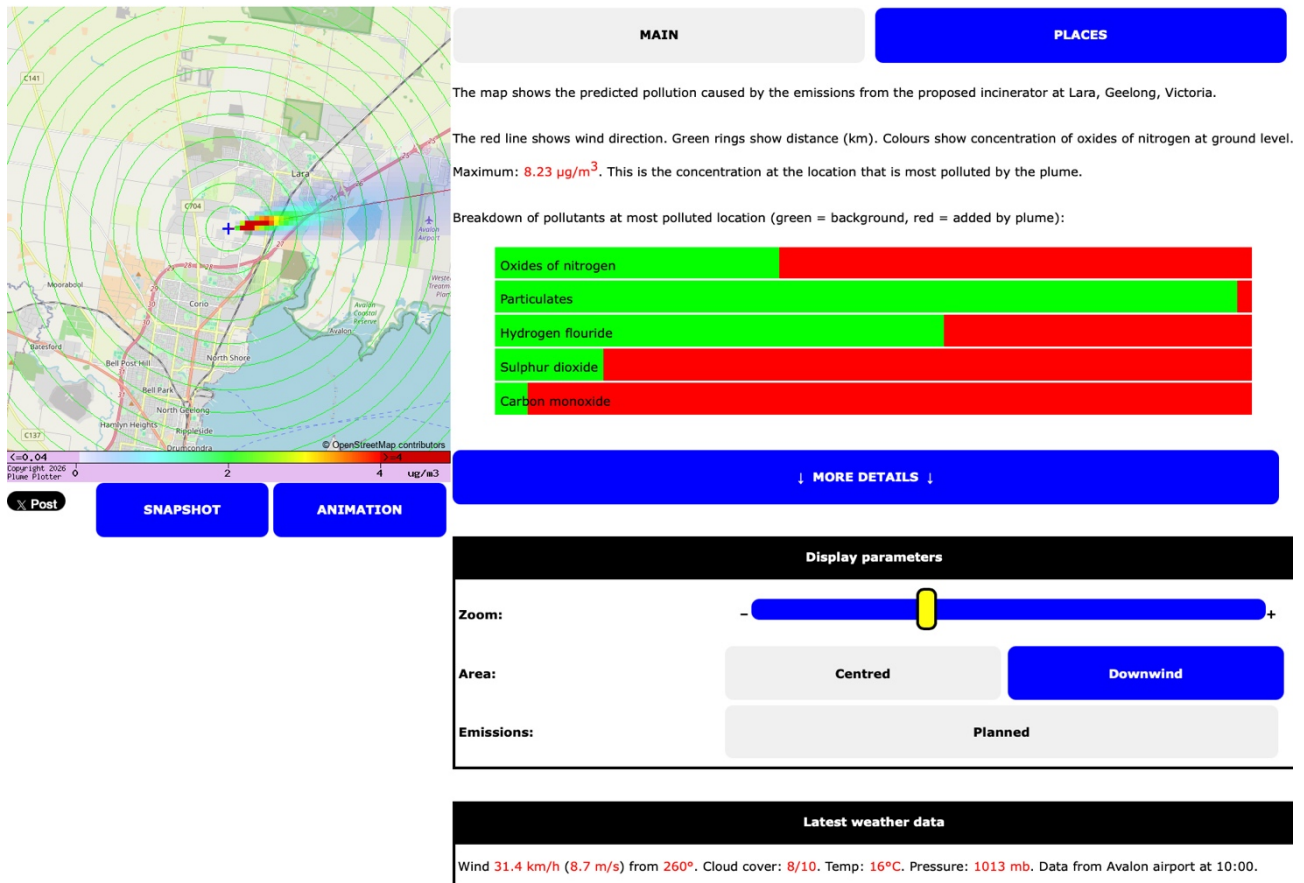
Closer to home, here is a “Plume Plotter” computer simulation of the expected stack emissions from the proposed Lara Energy-from-Waste (EfW) facility, based on real wind speed and direction data.

See <https://plumeplotter.com>

Lara/Geelong Plume Plotter

Lara/Geelong incinerator plume

at 10:00 on Thu, 12 Mar 2026



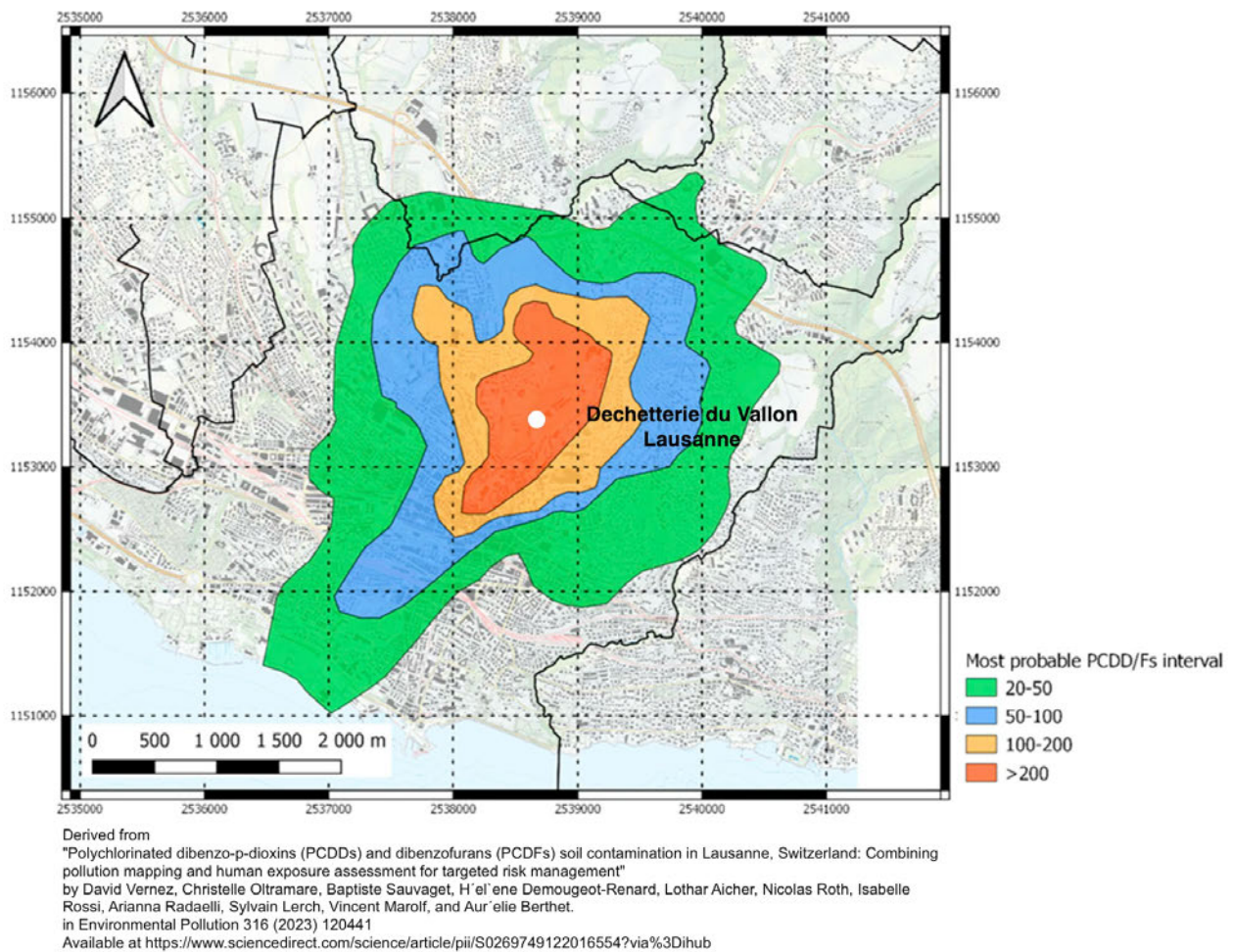
Consistent with reports from Europe in particular, we expect that toxic particulates from waste incinerators in Victoria will contaminate nearby crops, pastures, orchards, market gardens, livestock, towns and cities with Persistent Organic Pollutants (POPs) and heavy metals (7, 8, 9, 11, 12, 13, 14, 15, 16, 18, 24, 25, 40, 61, 73, 76, 86, 93, 99, 112, 118, 125, 127, 133, 143)

Subsequent bioaccumulation, and biomagnification of incinerator pollutants up the food chain are risks that must also be considered (26, 73, 74, 76, 98, 99, 102, 111, 125, 133).

Pollution gradients

The quantity of non-gas pollutants detected in landscapes around an incinerator has often been found to diminish with distance from the stack, sometimes reported as a “gradient”.

For example, here is a map of the pollution found around the incinerator in Lausanne Switzerland, as reported by Vernez et alia (2023) (127).



c) Types of toxic particulate emissions

Documented pollutants from standard waste incinerators include;

- Polyhalogenated dioxins and furans (87)
- PAH - polycyclic aromatic hydrocarbons (89)
- BPA – bisphenols (130)
- PFAS - per- and polyfluorinated alkyl substances (12, 18, 24, 26, 56, 112)
- PCB - polychlorinated biphenyls (12, 57, 97, 132)
- Heavy metals (9, 10, 15, 16, 25, 40, 48, 55, 74, 69, 75, 84, 114, 116, 117, 118, 127, 136, 143)
- Other particulates

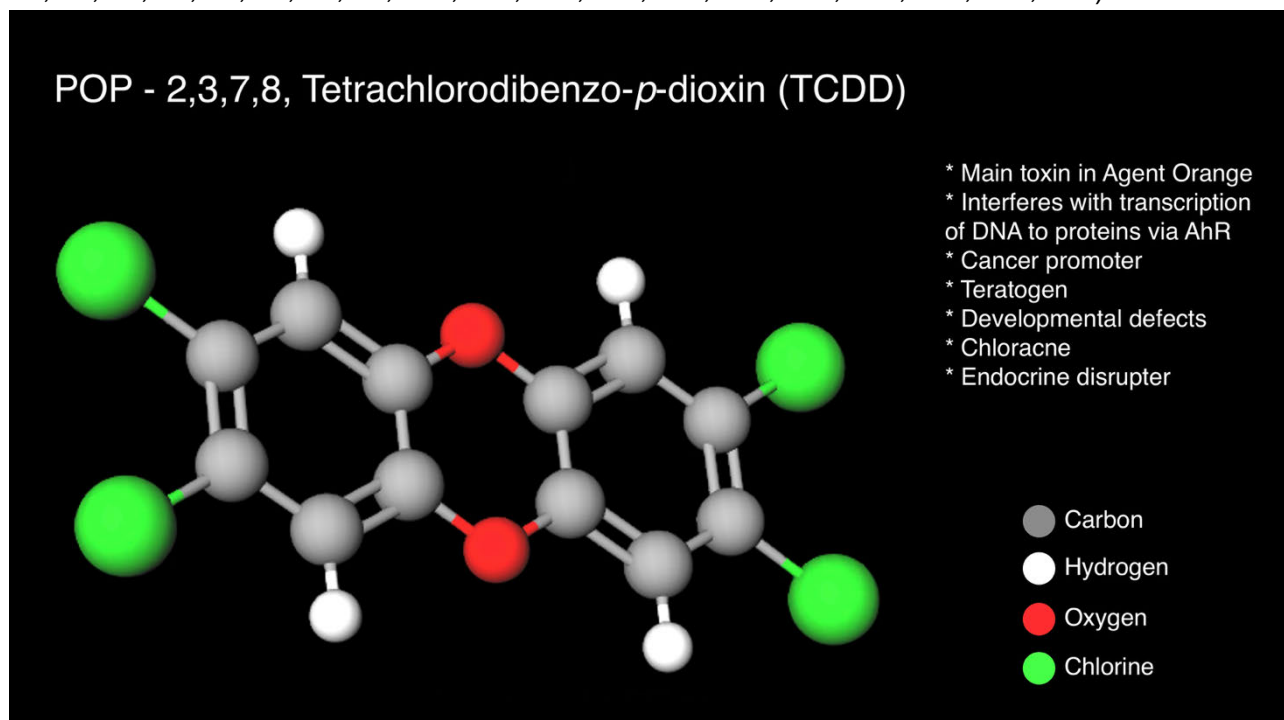
Halogenated dioxins and furans (e.g. TCDD)

Waste incinerators will produce polyhalogenated dioxins and furans if burning organic matter mixed with halogenated plastics, like the commonplace polyvinyl chloride (PVC). What is debatable is the degree to which a waste incinerator can then destroy the halogenated organic compounds which it has made (87).

Of the halogenated dioxins, 2,3,7,8 tetrachlorodibenzo-*p*-dioxin (TCDD) is the most notorious, as the prime carcinogen and teratogen in Agent Orange (64), and the villain of the Seveso industrial accident of 1976 (60, 64, 70)

“Chen, Su and Lee investigated the relationship between food consumption and blood dioxin concentration in 1,709 residents near 19 incinerators in Spain, finding significantly higher blood dioxins in those consuming locally grown food compared to those who did not ($p < 0.0001$). Similar results were found in Ranzi et al. and Cordier et al.” (114).

Halogenated dioxins and furans have little or no solubility in water, but are more soluble in fats and oils. They are chemically “durable”, with negligible breakdown rates under ambient conditions. They are not “washed away” by rain, but tend to bioaccumulate in the fat of animals that eat crops and pastures contaminated with these substances. This bioaccumulation can then be followed by biomagnification up the food chain (7, 8, 11, 12, 13, 14, 15, 16, 17, 18, 27, 32, 51, 53, 60, 61, 70, 72, 73, 74, 76, 85, 86, 87, 99, 100, 110, 114, 117, 118, 125, 127, 132, 133, 134, 143).



TCDD and similar compounds interfere with the proper function of the “aryl hydrocarbon receptor”. The AhR is a transcription factor found in every living cell in an animal or human, involved in switching on and off certain genes for the production of enzymes capable of destroying toxins like aryl hydrocarbons and similar. TCDD and congeners interfere with the normal functions of AhR (60)

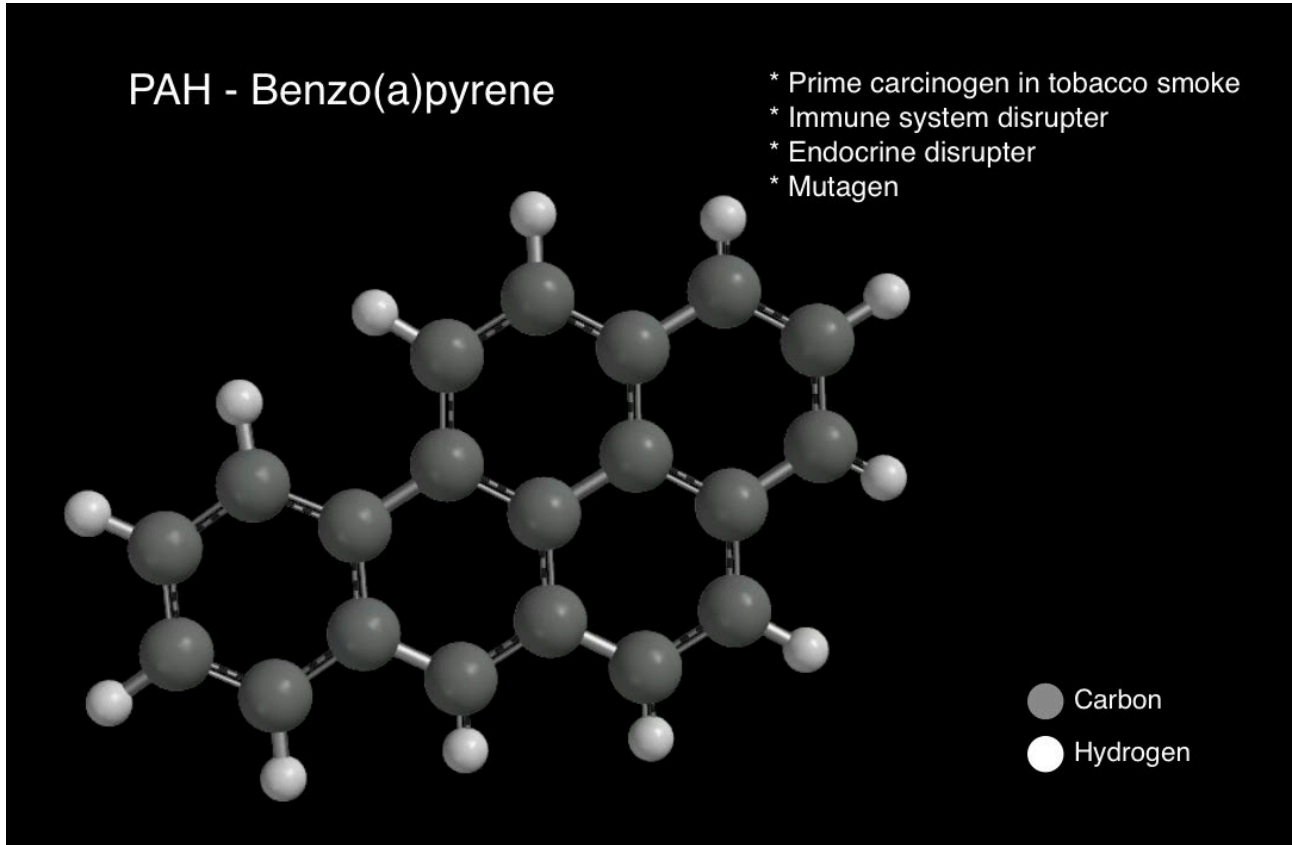
The Aryl hydrocarbon Receptor has a long evolutionary history and exists in many species of vertebrates and invertebrates. It is not just humans that are adversely affected by TCDD and its relatives.

PAH - polycyclic aromatic hydrocarbons

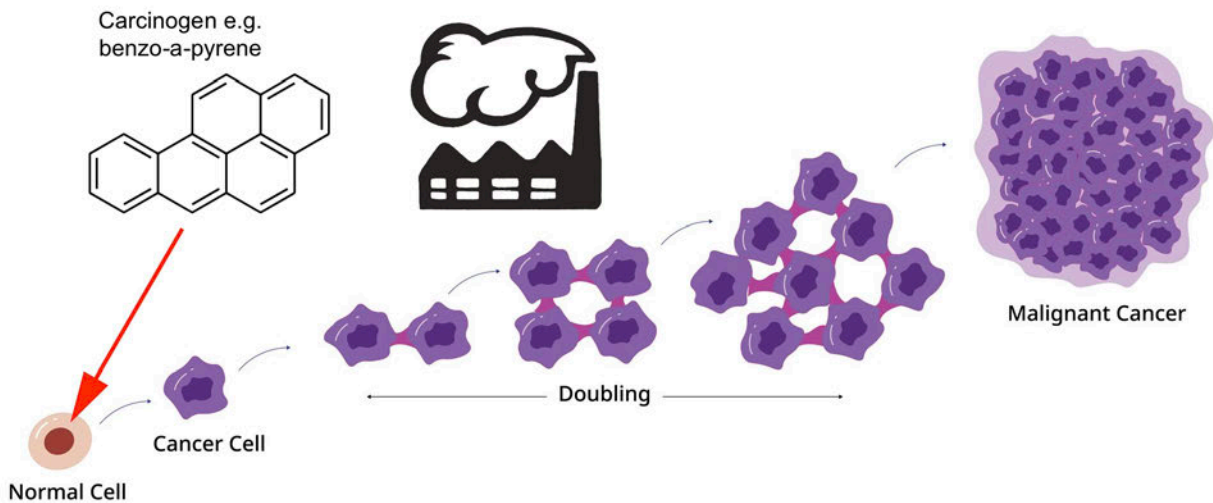
Various forms of PAH have been found in incinerator emissions (12, 18, 89)

The most studied PAH is benzo(a)pyrene. This molecule is regarded as the prime carcinogen in cigarette smoke. A cancer typically grows from a single cell with genes that have been damaged.

“Benzo[a]pyrene caused tumours in eight species, including nonhuman primates, at several different tissue sites, and by several different routes of exposure.” Workers in a range of industries including “municipal trash incinerators are exposed to PAHs” (89)



Cancer



No Waste Incinerators in Lara & Greater Geelong Incorporated

BPA - bisphenol A

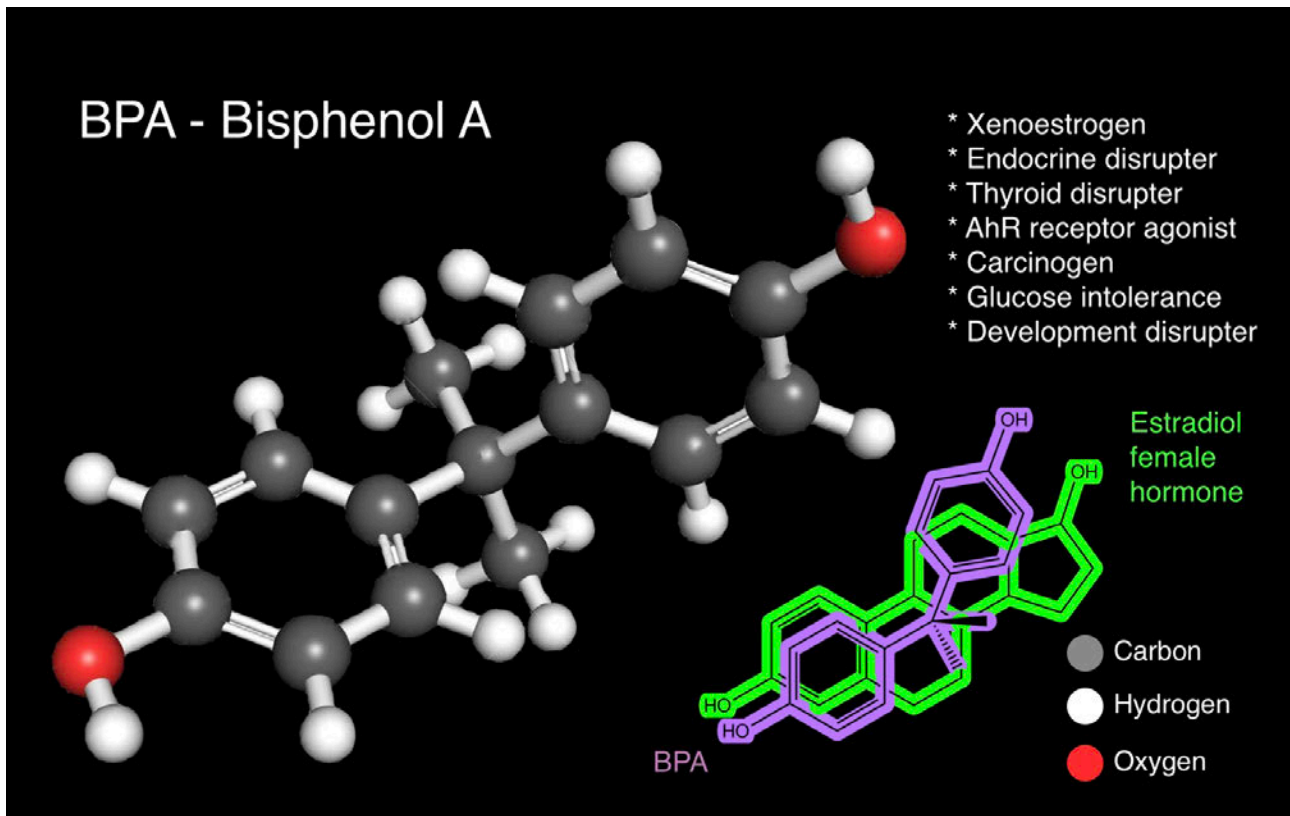
Bisphenol A (BPA) is a chemical compound primarily used in the manufacture of various plastics. Bisphenol A can be found in incinerator emissions (74).

The biological effects of bisphenols can be substantial (131)

“More than 100 human epidemiology studies have examined associations between BPA exposures and human diseases. Although these studies individually have limitations, they collectively suggest that current levels of exposure are associated with adverse health outcomes. Hundreds of controlled laboratory animal studies have also identified adverse health outcomes in mice, rats, zebrafish, non-human primates and other model species after exposures to BPA. Endpoints as diverse as changes to the structure of the brain, behavioural and cognitive decrements, disruptions to metabolism and obesity, altered reproductive function (male and female), shifted age at pubertal onset, cardiac remodelling, and pre-cancerous and cancerous lesions in the mammary gland and prostate, have been reported, often following exposures below the US Environmental Protection Agency (EPA)’s reference dose of 50 µg/kg/day”

See Prins et alia (2018) at <https://pmc.ncbi.nlm.nih.gov/articles/PMC6414289/>

Bisphenols can also bioaccumulate and biomagnify up the food chain.



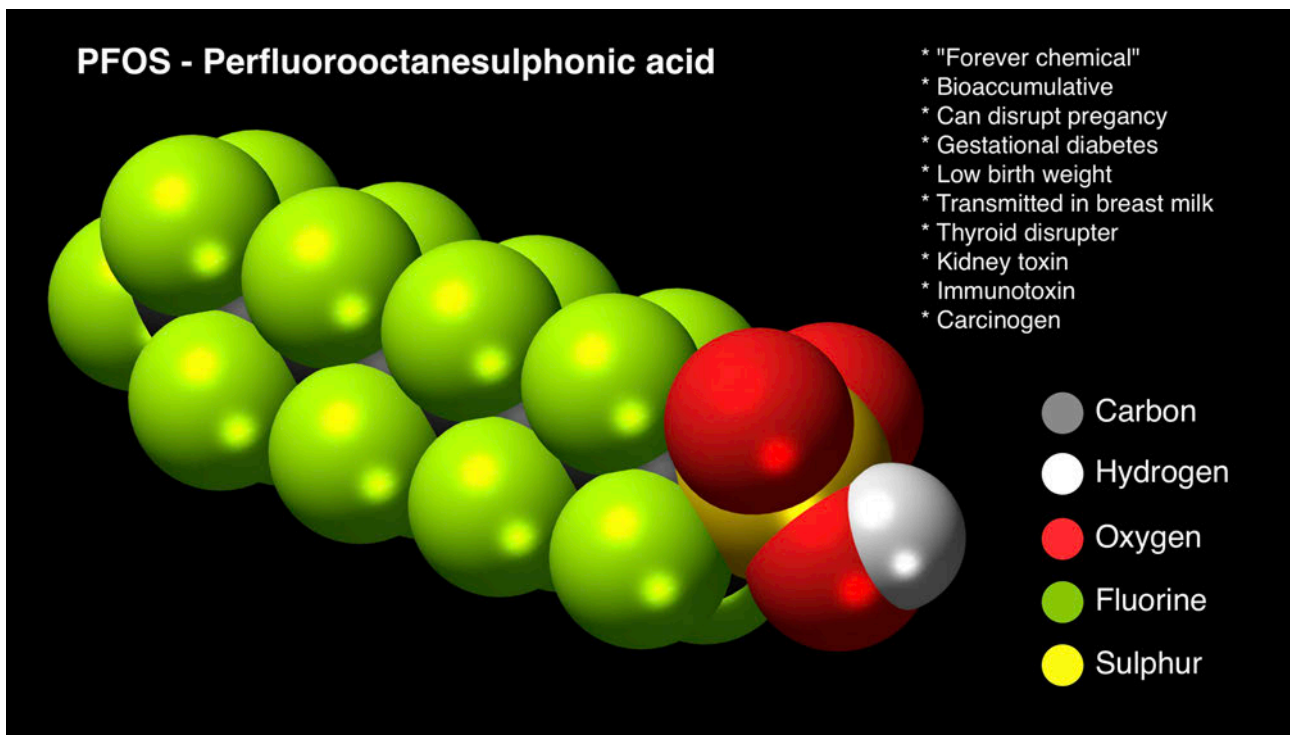
No Waste Incinerators in Lara & Greater Geelong Incorporated

PFAS - per- and polyfluorinated alkyl substances

“PFAS” includes a wide range of substances all of which contain strong carbon fluorine bonds. These chemicals have been commonplace ingredients in fire fighting forms, non-stick cookware and stain resistant clothing and carpets. PFAS do not break down in nature, so they are often referred to as “forever chemicals”. PFAS have many toxic effects on many species, including humans (15).

PFAS are chemically inert. Many types of PFAS have boiling points well below the typical waste incinerator set point of 850 Celsius. However, PFAS requires over 1,100 Celsius for thermal destruction. This temperature must then be followed by “gas scrubbing” to prevent new types of PFAS spontaneously forming from the “broken pieces” (this is called “de novo synthesis”). We expect that any PFAS placed in an 850 Celsius waste incinerator furnace will simply boil off, evading post-combustion chemical and physical removal treatments, exiting the stack and condensing over the landscapes and waterways around the waste incinerator (12, 18, 24, 26, 51, 53, 56, 78, 80, 91, 111, 143) as the vapours cool.

PFAS can also bioaccumulate and biomagnify up the food chain (15)



No Waste Incinerators in Lara & Greater Geelong Incorporated

PCBs - polychlorinated biphenyls

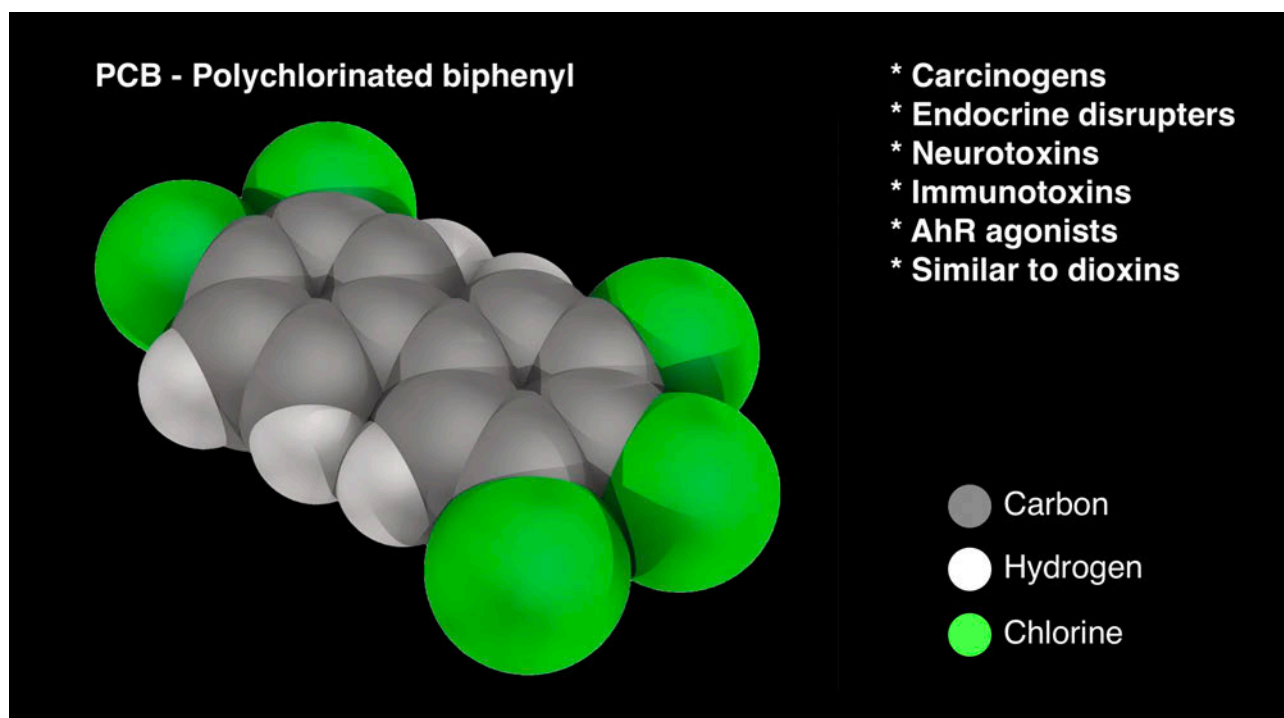
Polychlorinated biphenyls (PCBs) are a group of very stable chlorinated aromatic hydrocarbons.

Before 1980 they were widely used as coolants and lubricants in electrical equipment – for example, transformers, generators and capacitors.

In the United States ...

“... (the) EPA estimated that people within 12 miles of commercial incinerators might be exposed to PCBs released to air.” PCBs have been commonly used as electrical insulating fluids, and have been measured in air, water, soil, and human tissues in all parts of the world. “Polychlorinated biphenyls (PCBs) are reasonably anticipated to be human carcinogens based on sufficient evidence of carcinogenicity from studies in experimental animals.” (88)

PCBs bioaccumulate and biomagnify up the food chain (61, 88)



The following map from Williams et alia (2023) shows the numbers of deceased marine mammals found along the British coastline and analysed for Persistent Organic Pollutants (mainly chlorinated hydrocarbons) in their blubber (132). The map shows how marine mammals, as apex predators, bioaccumulate these fat-soluble toxins, even though these substances were never directly applied to the sea.

Williams et alia have “identified exposure to PCBs as the greatest risk to health” of the marine mammals that they have studied, compromising their ability to breed (132).

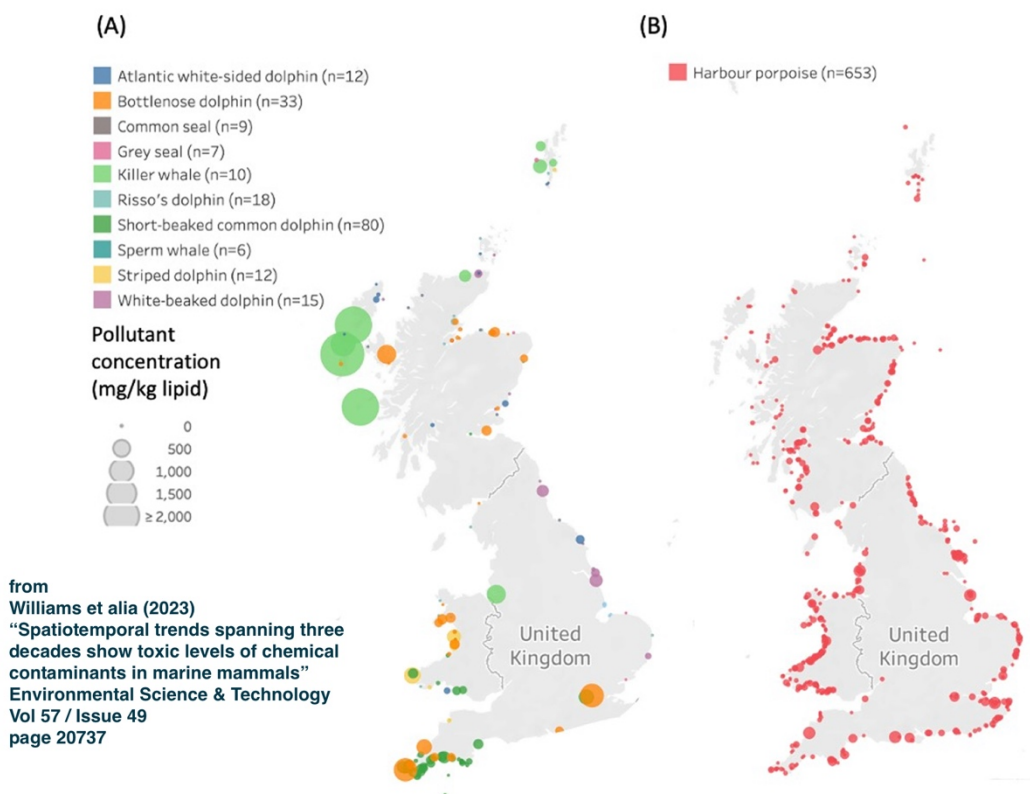


Figure 1. Geographic locations of the stranded individuals that were analyzed to obtain pollutant blubber concentrations (HCB, Dieldrin, \sum DDTs, \sum CBs, \sum HCHs). PBDEs were excluded from the summed totals as tissue concentrations were not available for some of the species. The colors of the dots represent the different species, and the raw data are sized by the summed blubber concentrations of pollutants. (A) All species, excluding harbor porpoises. (B) Harbour porpoises.

Heavy metals

Tait et alia (114) reported the following heavy metals are associated with waste incinerator emissions;

- mercury (Hg)
- lead (Pb)
- arsenic (As)

In addition, Arkenbout & Bouman (2925) found nickel (Ni) and cadmium (Cd) associated with the Ivry-Paris XIII waste incinerator (17).

Di Ciaula et alia (2020) took toenail clippings from a total of 220 children volunteers. Sixty two of the children were living within three kilometres of two waste incinerators. The remaining children (controls) were living outside that 3km radius. Di Ciaula and colleagues found that the children living within 3km of the incinerators had significantly higher levels of the metals Barium (Ba), Manganese (Mn), Copper (Cu), and Vanadium (V) in their toenail clippings (40).

Di Ciaula concluded;

"The present study employed the concentration of metals in toenails as an expression of long-term body accumulation of a wide panel of metals, demonstrating, in children living close to waste incinerators, an increased concentration of specific metals (in particular Ba, Mn, Cu, and V) potentially leading to an increased health risk." (40)

Jovan et alia (2024) found an incinerator in rural Oregon USA that appeared to be emitting compounds of exotic metals such as gadolinium (Gd) and europium (Eu), possibly as a result of incinerating medical waste (75).

No Waste Incinerators in Lara & Greater Geelong Incorporated

Particulates

Particulates are tiny particles of solid (or liquid) emitted from the waste incinerator stack, or dust from incinerator operations.

Particulates are often reported in micrograms (μg) per cubic metre, and classified by size as

- PM10 - particles of approximately ten micrometres (“microns” or μm) or less in diameter
- PM2.5 - particles of approximately 2.5 micrometres or less in diameter

Such small particles are often perceived as “smoke”. PM2.5 are so small that they can invade the tiniest air sacs in the lungs called “alveoli” and enter the bloodstream directly.



The image shows volunteers with the “Airbeam 3”, a personal air quality monitor which measures particulates in the air, recording the relevant data.

See <https://www.habitatmap.org/airbeam>

d) Greenhouse gas emissions

As products of combustion, the emissions of carbon dioxide (CO₂) and nitrous oxide (N₂O) from waste incinerators contribute to global warming (23, 62, 109),

Affecting all of us, global warming is a factor in weather extremes, droughts, floods, bushfires, crop failures, biological migrations and extinctions, with direct public health effects such as increased incidences of heat stroke. Extreme weather events also contribute to damage to transport infrastructure: floods and fires damage roads, bridges and railways.

See CSIRO / BOM (2024) "State of the Climate" at <https://www.csiro.au/en/news/All/Articles/2024/November/State-of-the-Climate-2024>

The waste incineration industry claims that the global warming impact of emissions of greenhouse gasses from waste incinerators is less than the impact of emissions from landfills (58).

This assertion is false, with respect to landfills which are constructed according to modern standards for methane capture and disposal. Logically, all the policy and legislation built on that falsehood is also false. (38, 41, 30, 38, 58, 59, 90, 130)

Old style landfills, receiving significant percentages of biological wastes (sometimes referred to as "FOGO" or Food Organics & Garden Organics), will emit methane (CH₄) due to underground microbiological degradation in a low oxygen environment. Methane is a far more potent greenhouse gas than CO₂. Methane should never be released directly to atmosphere.

However, modern waste management practice is to divert biological wastes including FOGO away from landfill to processes such as composting, anaerobic digestion, and "farming" of invertebrates such as annelids and arthropods (worms and insects). These treatments produce more CO₂ and less CH₄. Where CH₄ is produced in (say) modern well-engineered anaerobic digestion facilities, that methane is not released to the atmosphere, but rather captured in closed vessels, then used as fuel in an engine, turbine or boiler recovering mechanical energy and converting the CH₄ to the less harmful CO₂.

Many landfills and some waste water treatment ponds are now "covered and tapped" to capture the CH₄. which may then be used as fuel, or flared off.

Comparing greenhouse gas emissions from waste incineration to modern landfill practice, is a false comparison.

The current methods of calculation of greenhouse gas emissions from waste management facilities are so complex, and reliant on so many dubious assumptions, that we consider the objective to be obfuscation (90).



No Waste Incinerators in Lara & Greater Geelong Incorporated

Clarity can be achieved via two simple postulates;

- If the carbon in the emitted CO₂ came from a modern biological source, it is part to the grand biological carbon cycle and should NOT be counted as contributing to global warming, even if it went through a methane phase along the way. The biological carbon cycle is a true “circular economy” powered by sunlight and photosynthesis. See NOAA (2025) “Carbon cycle” at <https://www.noaa.gov/education/resource-collections/climate/carbon-cycle>
- If the carbon in the CO₂ came from underground (e.g. coal / petroleum oil / petroleum gas) it is certainly contributing to global warming. This “fossil carbon” based CO₂ is not part of any “circular economy” concept (23, 90).

Is it possible to tell the difference between biogenic carbon and fossil carbon ? Yes, modern biogenic carbon contains a tiny trace of the radioactive isotope “carbon14”, but fossil carbon contains none.

See HowStuffWorks (2023) “How carbon dating works” at <https://science.howstuffworks.com/environmental/earth/geology/carbon-14.htm>

e) **Public health impacts of waste incinerator emissions**

Allsopp

The harms of waste incinerator emissions have been documented in the scientific literature for over 20 years. For example, Allsopp et alia (2001) found;

“Experimental data confirm that incinerators release toxic substances and that humans are exposed as a consequence. Studies on workers at incinerator plants, and populations residing near to incinerators, have identified a wide range of associated health impacts. These studies give rise to great concerns about possible health impacts from incinerators even though the number of studies (particularly those that have been conducted to appropriately rigorous scientific standards) is highly limited. These should be seen, however, as strongly indicative that incinerators are potentially very damaging to human health.” (9)

Allsopp provides a list of some of the scientific evidence of the health effects of waste incinerator emissions.

In summary;

- Elevated mutagens in urine
- Elevated levels of PAH markers (polycyclic aromatic hydrocarbons) in urine.
- Proteinuria and hypertension.
- Chloracne (possibly due to dioxin exposure).
- 44% increase in soft tissue sarcoma (cancer) and 27% non-Hodgkin’s lymphoma.
- 6.7 fold increase in likelihood of mortality from lung cancer.
- Increased respiratory symptoms, including 9-times increase in reporting of wheezing or cough.
- Adverse impacts on lung function of children.
- Lower thyroid hormone levels in children.
- Increased allergies, increased incidence of common cold, increased complaints about health in general, increased use of medication in school children (9).

No Waste Incinerators in Lara & Greater Geelong Incorporated

Tait

More recently, Dr. P. W. Tait et alia (2020) of the Australian National University performed a systematic review of the existing scientific literature regarding emissions from waste incinerators. Tait found the following health effects;

“A range of adverse health effects were identified, including significant associations with some neoplasia (cancers), congenital anomalies (birth defects), infant deaths and miscarriage, but not for other diseases. Ingestion (eating contaminated food) was the dominant exposure pathway for the public. Newer incinerator technologies may reduce exposure.” (114)

Tait concluded as follows;

“Older incinerator technology and infrequent maintenance schedules have been strongly linked with adverse health effects. More recent incinerators have fewer reported ill effects, perhaps because of inadequate time for adverse effects to emerge. A precautionary approach is required. Waste minimisation is essential.” (114)

also

- “New incinerators should be located away from areas of food production.”
- “Food grown near an incinerator should be avoided.”, and
- “...based on a precautionary principle there is insufficient evidence to conclude that any incinerator is safe.” (114)

There are many versions of the Precautionary Principle. Here is one.

“The precautionary principle is a strategy used to prevent harm to the public or the environment when scientific knowledge is incomplete. It suggests taking preventive action in the face of uncertainty, rather than waiting for conclusive evidence of harm.”

We question the practicality of “avoiding food grown near an incinerator”. How would the consumer know? Should that information be printed on the packaging?

Due to the interconnectedness of Earth’s ecosystems, we contend that the entire surface of the earth (with the possible exception of the interior of the Antarctic continent, but including all the oceans) consists of “areas of food production”.

And who would want to burn trash at the South Pole anyway?

Accepting the truth of Tait’s three postulates, there can be no place on the surface of the Earth which is a suitable location for a waste incinerator.

The application of the Precautionary Principle logically precludes waste incineration.

Eskenazi - TCDD

The carcinogen “TCDD” or 2,3,7,8, tetrachlorodibenzo-p-dioxin is a notorious component of waste incinerator emissions. In 1976 an explosion liberated between 15 and 30 kilograms of TCDD over the town of Seveso Italy and environs.

TCDD interferes with the proper functioning of the Aryl hydrocarbon Receptor (AhR).

In a major review of the medical research on the Seveso TCDD accident, Eskenazi et alia summarised as follows.

“Clearly, TCDD exposure resulted in chloracne, and children were most susceptible. The results of Seveso studies also suggest that early-life exposure to relatively high doses of TCDD may have effects on both male and female fertility. However, some of the most compelling evidence is that TCDD exposure increases risk for cancer, and within women, potentially breast cancer. There may be other individual cancers that are increased such as thyroid and blood cancers, but these results are limited by sample size or exposure assessment. TCDD seems to also affect cardiometabolic outcomes including metabolic syndrome, but results on diabetes are conflicting.” (60)

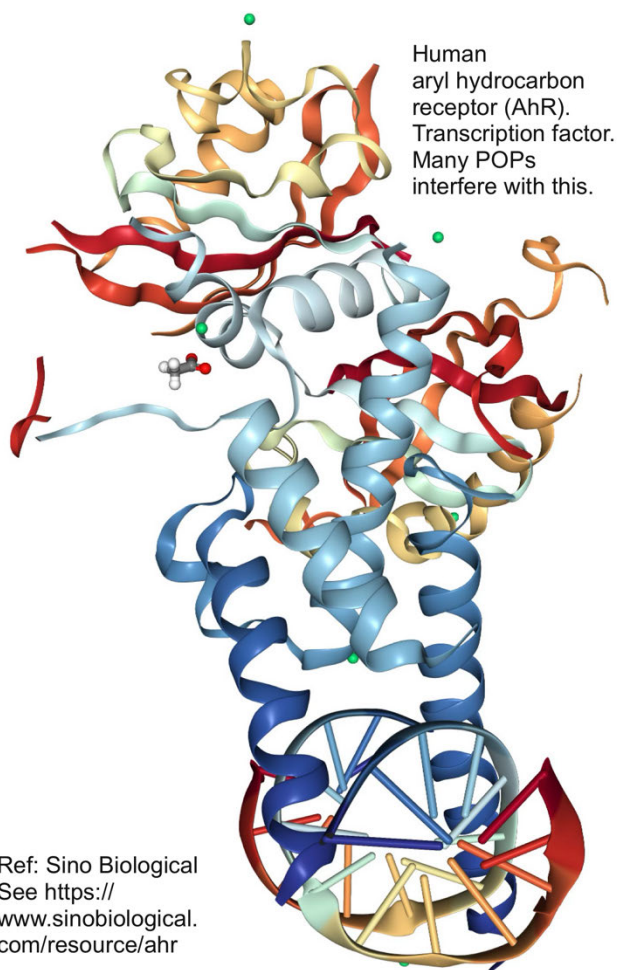
Eskenazi only comments on the human impacts of the Seveso accident.

Worthy of consideration however, are the additional implications of TCDD incinerator pollution on agricultural livestock and wildlife. Most forms of animal life appear to have the Aryl hydrocarbon Receptor (AhR) which is especially impacted by TCDD (60).

Arkenbout & Bouman (2025) state;

“Heavy metals like lead, mercury, cadmium, and arsenic are associated with developmental problems, especially neurodevelopmental disorders such as autism spectrum disorder (ASD) and ADHD. They can impair cognitive, motor, language, and behavioural development. Exposure during prenatal and early childhood stages is particularly harmful, as it disrupts brain development via mechanisms like oxidative stress and mitochondrial damage.” (18)

“There is no safe level for particles matter (PM) exposure or no safe limits for heavy metals in air dust. Long-term evidence of heavy metals exposure shows measurable impacts on children’s cognitive development.” (18)



No Waste Incinerators in Lara & Greater Geelong Incorporated

Leathersich - in vitro fertilisation

More recently, Leathersich et alia (2024) found a negative relationship between particulate air pollution and the success rate of in vitro fertilisation (IVF).

By analysis of historical data, and without experimentation, Leathersich et alia found;

“Increased PM_{2.5} exposure in the 3 months prior to oocyte (human egg) retrieval was associated with decreased odds of live birth (linear trend $P=0.011$); the odds of live birth when PM_{2.5} concentrations were in the highest quartile were reduced by 34% (OR 0.66, 95% CI 0.47–0.92) when compared to the lowest quartile. A consistent direction of effect was seen across other exposure periods prior to oocyte retrieval, with an apparent dose-dependent relationship. Increased exposure to PM₁₀ particulate matter in the 2 weeks prior to oocyte retrieval was associated with decreased odds of live birth (linear trend $P=0.009$); the odds of live birth were decreased by 38% (OR 0.62, 95% CI 0.43–0.89, $P=0.010$) when PM₁₀ concentrations were in the highest quartile compared with the lowest quartile. Consistent trends were not seen across other exposure periods. None of the gaseous pollutants had consistent effects, prior to either oocyte retrieval or embryo transfer.” (77)

The findings of Leathersich et alia are consistent with the findings of Fei Li et alia (2025) who concluded;

“The study complements existing evidence that exposure to PM_{2.5} can lead to decreased success rates of pregnancy and live births, as well as significantly impact the outcomes of ART (Assisted Reproductive Technologies) (79)

Questions which logically arise ...:

- Whilst a negative statistical relationship has been found, what is the “cause and effect mechanism”, if any ?
- What is the chemical composition of the particulates in question ?
- Are these particulates coming from waste incinerators ?
- Would these particulates have similar effects on natural human conception ?
- Would these particulates have some effect on conception / fertilisation by domestic animals, agricultural livestock, aquaculture, or wildlife ?

We need to know.

And until we know, the Precautionary Principle must apply.

Brunn - PFAS

PFAS is an acronym for “per- and polyfluorinated alkyl substances”.

PFAS is a large class of chemicals, all of which contain carbon-fluorine bonds; amongst the strongest known to science.

We are not aware of any organisms capable of breaking carbon-fluorine bonds by metabolism, so they are not “biodegradable”.

PFAS have been used since the 1950s in the production of non-stick cookware, fire fighting foams, and stain resistant carpets.

A standard waste incinerator operating at 850 Celsius is not capable of destroying PFAS (26). Some 1,100 degrees Celsius is required for that, immediately followed by “scrubbing” of the exhaust gas to prevent the liberated fluorine atoms from forming new PFAS molecules: a process known as “de novo synthesis” (26).

No Waste Incinerators in Lara & Greater Geelong Incorporated

PFAS for which we have seen the data, have boiling points between 110 and 250 Celsius.

Therefore, we expect that any PFAS loaded into a standard waste incinerator furnace will simply boil off. Being chemically inert, a fraction of the PFAS will evade attempts to remove them by physical and chemical means, thus some will emerge from the stack to condense over the landscapes and waterways around the incinerator. At 850 Celsius some PFAS will be modified, but not destroyed (24).

Up to the time of Tait's systematic review (2020) very little was documented regarding the public health and environmental impacts of PFAS. More recently, Brunn et alia (2023) and others (24,51) have provided comprehensive reports on PFAS, including biological effects on humans. Brunn (26) lists reports of effects of PFAS on humans such as;

- immune system impairment
- reduced birth weight
- non-alcoholic fatty liver disease (NAFLD)
- chronic kidney disease (CKD)
- cancers of the liver, kidneys, testes, prostate and breast
- thyroid and sex hormone impairment (endocrine disruption)
- abnormal organ development in children (genitals, liver, kidney, brain)
- metabolic disorders in the mother, such as gestational diabetes (26)

No Waste Incinerators in Lara & Greater Geelong Incorporated

Eggs

Tait et alia (2020) and other researchers are of the view that the main route by which people become contaminated with waste incinerator toxins is by consuming polluted food.

“Ingestion (eating contaminated food) was the dominant exposure pathway for the public.” (114)

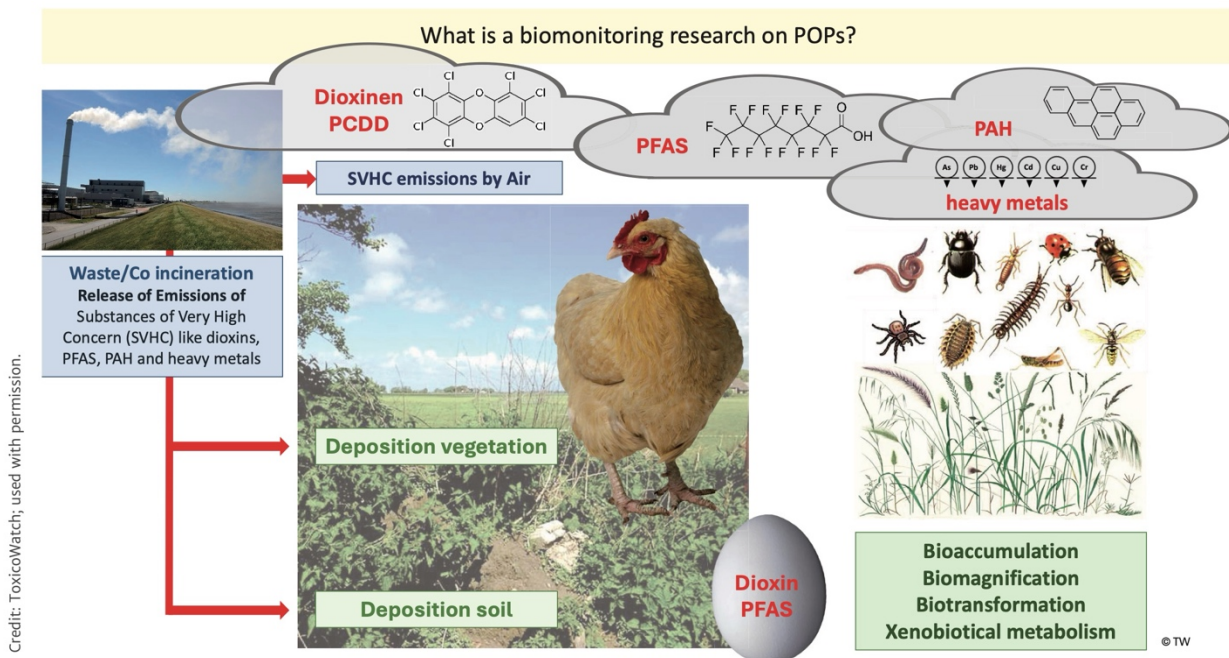
What food ?

One of the most studied foods with respect to Persistent Organic Pollutants is chicken eggs, an important source of nutrition especially in developing nations.

Chickens are smarter than we think. They detoxify themselves by cleverly disposing of their ingested poisons into their eggs !

With 20 years of data, Petrlik et alia have found high levels of POPs including TCDD in chicken eggs, from chickens kept near waste incinerators and other industrial facilities (98).

“Persistent organic pollutants (POPs) such as polychlorinated dibenzo-para-dioxins and dibenzofurans (PCDD/Fs) or polychlorinated biphenyls (PCBs) elicit toxic effects including e.g. adverse reproductive effects, neurodevelopmental impairment, damage to the immune system, and endocrine disruption as well as cancer.” (98).



Ref: Arkenbout et alia (2025) "Introduction of innovative sampling media for biomonitoring of environmental loads of POPs" p5, DOI: 10.62178/sst.003.002

Figure 3: The setting of the use of the novel sampling medium backyard chicken eggs for measuring pollution loads of dioxins, PFAS and heavy metals.

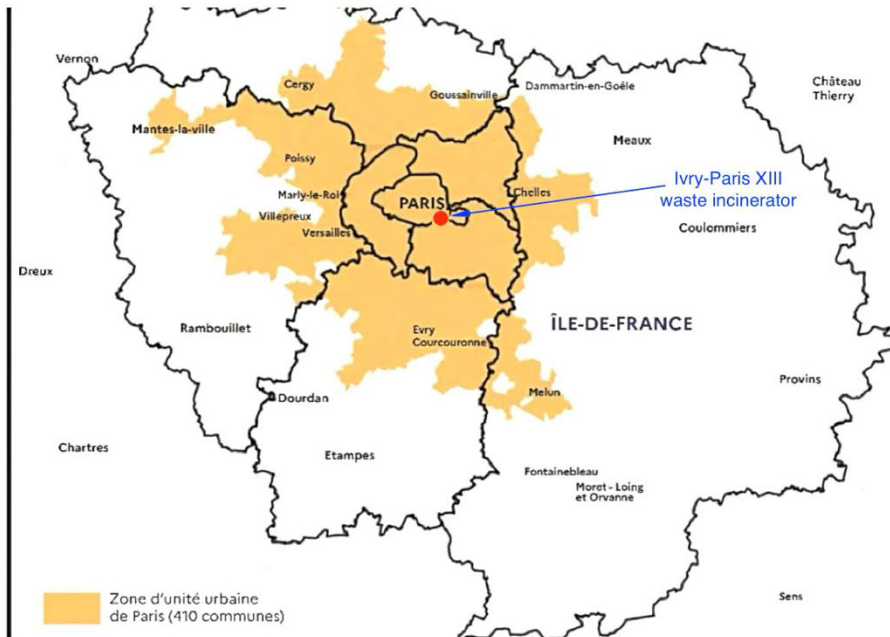
No Waste Incinerators in Lara & Greater Geelong Incorporated

Eggs Parisienne

In 2023 the French health authority confirmed the findings of ToxicWatch that high levels of Persistent Organic Pollutants are found in backyard chicken eggs from central Paris (7, 8, 11, 13, 17)

“There is "ubiquitous [widespread] contamination of soil and eggs from domestic chicken farms in Paris and the inner suburbs by persistent organic pollutants `POPs`]" such as dioxins, furans, polychlorinated biphenyls and per- and polyfluoroalkyl substances (known as PFAS or forever chemicals), the agency explains in a press release.” EuroNews (61)

French health authorities have reiterated warnings to millions of residents not to eat eggs from domestic coops in the Île de France (Central Paris) region. (7, 61)



The warning from the French health authority “covers the 410 municipalities which make up the urban area of Paris. This includes Paris, all the municipalities of Seine-Saint-Denis, Hauts-de-Seine, Val-de-Marne, certain municipalities of Seine-et-Marne, Yvelines, Essonne and Val-d’Oise.” (61)

We understand that the French warning about backyard chicken eggs affects a population of some 12 million people (61).

The areas affected by the health authority's warning. - Île de France regional health authority

From many locations around the world, here is a summary of the findings of Petrlik et alia (2022) regarding contamination of chicken eggs with polychlorinated dibenzo dioxins / furans (98), with polybrominated dibenzo-*p*-dioxins and dibenzofurans also implicated (99).

Most of the locations documented by Petrlik would be in breach of current European Union limits for POPs in chicken eggs.

No Waste Incinerators in Lara & Greater Geelong Incorporated

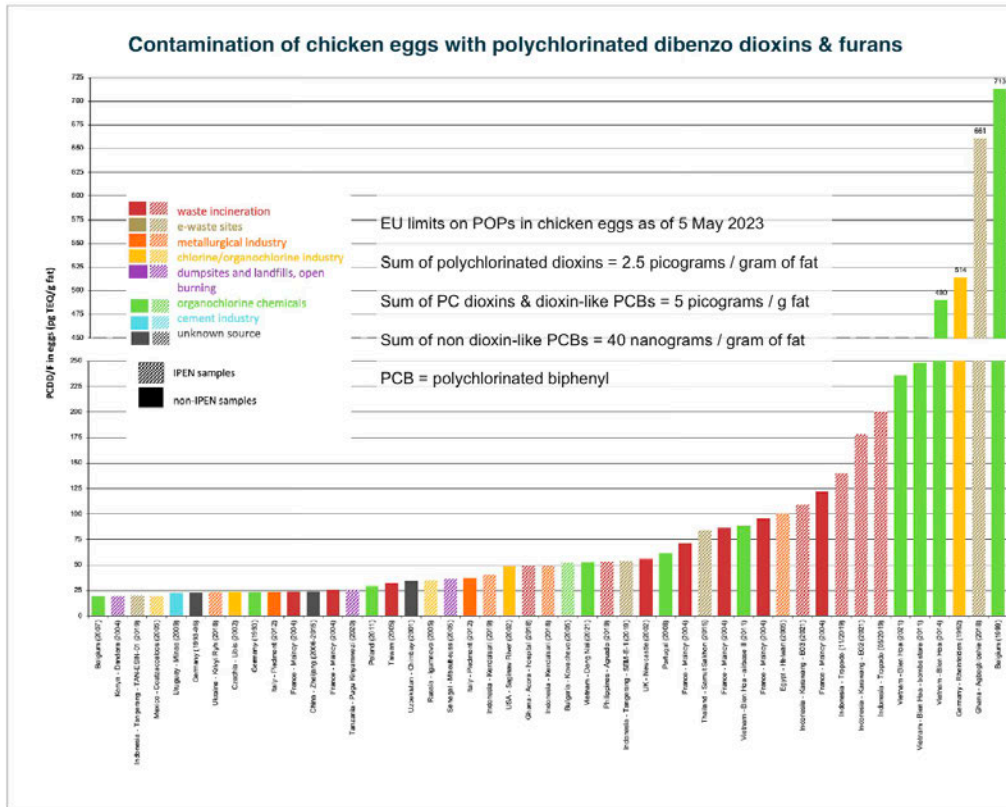


Fig. 2. Highest PCDD/F-Contaminated eggs (HC-PCDD/F) measured within IPEN studies (striped bars) and from other scientific literature references (filled bars). (Information including references on individual sites are compiled in Table S2 in supporting information).

Such is the fate of Lara, Sunbury, Wollert, Dandenong South and Maryvale ?

Doctors for the Environment Australia (2021)

In 2021, Doctors for the Environment Australia submitted to the Parliament of Victoria as follows;

“PM10 and PM2.5 are emitted during the combustion of solid and liquid fuels, such as occurs during power generation, within vehicle engines, from wood heaters and from industrial processes. In addition to these direct emissions, PM can also be formed from the chemical reactions of gases such as sulphur dioxide and nitrogen oxides (NOx: nitric oxide plus nitrogen dioxide). Measures to reduce the emissions of these precursor gases are therefore often beneficial in reducing overall levels of particulate matter.

Short-term exposure to PM10 has been associated with worsening of respiratory diseases including asthma and chronic obstructive pulmonary disease, leading to hospitalisations and emergency department visits. Longer term exposure has been linked to chronic cardiorespiratory conditions and metabolic disorders. No safe threshold for PM10 exposure has been identified.

PM2.5 exposure is recognised as one of the leading causes of global mortality and morbidity. Short-term exposure has been associated with respiratory symptoms, acute and chronic bronchitis, asthma attacks, emergency room visits, increased hospital admissions due to cardiorespiratory conditions and premature mortality. Longer term exposure has been linked to chronic cardiac and respiratory disease, neurological disorders kidney diseases, diabetes, infertility, increased risk of miscarriage and pre-term birth, low-birth weight and reduced lung function in children.

Similar to PM10, there is no evidence for a safe threshold for PM2.5 exposure.”

No Waste Incinerators in Lara & Greater Geelong Incorporated

See Doctors for the Environment "Submission to the Inquiry into the Health Impacts of Air Pollution in Victoria" April 2021, pages 18 - 19 (37).

See also Motley, Bilal (2024) "Trash & Burn" produced by Bilal Motley.
See the video at <https://vimeo.com/906867851/a98760ca76>

New and refurbished incinerators are safer than older ones. Yes ?

We find that the evidence suggests to the contrary.

A 2025 study by the independent ToxicoWatch Foundation, reported serious pollution around three modern and modernised European waste incinerators (143);

- Ivry-Paris XIII - France - built 1969, and rebuilt many times since
- Harlingen - Netherlands - built 2011
- Zubieta - Basque Country, Spain - built 2019

ToxicoWatch found;

"The studies, conducted near WtE facilities in Paris, Harlingen, and Zubieta, revealed widespread and dangerous levels of contamination in soil, water, vegetation, and even food such as farm eggs. Dioxin levels in moss, soil, and backyard chicken eggs exceeded EU limits at all three sites, with serious concerns for one sample site in Paris' Ivry-sur-Seine district, a schoolyard playground. In Harlingen, PFAS concentrations in water were recorded at 138 times the Dutch legal drinking water threshold, while in Zubieta, a backyard egg sample from Hernani showed the highest dioxin levels found by the ToxicoWatch Foundation in Europe over the past 13 years. Heavy metals including lead, mercury, and arsenic were also detected in areas close to homes, parks, and schools." (143)

As these waste incinerators are all in Europe, they are supposed to be compliant with the European Union's EC 2019 BREF waste incineration standards (47). And perhaps they are !

This and many other recent studies give us profound cause to doubt the proposition that "newer incinerator technologies may reduce exposure" (114).

No Waste Incinerators in Lara & Greater Geelong Incorporated

Our conclusions

- The scientific evidence demonstrates that waste incinerators are implicated in the contamination of surrounding landscapes and biota, placing environmental and public health at risk (142)
- The scientific evidence demonstrates that the imposition of “strict controls” on waste incinerators such as the European BAT (Best Available Technology) requirements in EC 2019 BREF (47) has not been effective in preventing landscape scale contamination with toxic pollutants.
- We have therefore concluded that EC 2019 BREF (47) is “not fit for purpose”; its principal deficiency being a lack of requirements for verification of effectiveness by testing the environs and biota around the waste incinerators for deposited and ingested pollutants.
- Standard waste incinerators are also contaminating the atmosphere with greenhouse gasses, especially carbon dioxide. For every tonne of fossil carbon incinerated (mainly originating as plastic made from fossil fuels) about three tonnes of NET carbon dioxide (CO₂) is added to the atmospheric burden of greenhouse gasses, exacerbating global warming (23, 62, 90, 109, 116, 135, 141)
- The assertion that standard waste incinerators have lower greenhouse gas emission equivalents than modern landfills is false (62, 90, 121, 140).
- The assertion that waste incineration is part of any “circular economy” concept is false (74, 123, 130, 136). Waste incineration negates a circular economy.
- The assertion that waste incinerators are “harmless” is false (74).
- All the legislation built on the false claims of waste incineration harmlessness, is also false (74).
- Based on the extensive and growing body of scientific evidence, we expect the proposed Lara WtE facility, and similar facilities in “Melbourne’s “Ring of Fire”, will adversely affect our communities with respect to health, environment, business/employment, property, pets, gardens, crops, pastures, livestock, air quality, recreation, odour, food quality, water quality, transport amenity, road safety and other aspects of our lives (74, 118, 119, 125, 127).

The evidence suggests that women and children are the most vulnerable demographic (25, 27, 32, 50, 60, 76, 77, 79, 93, 100, 114, 119, 133).

No Waste Incinerators in Lara & Greater Geelong Incorporated

- (1) the suitability of existing WtE infrastructure plans and policies, including –
(b) annual caps on waste that can be used in thermal WtE processing;

Evidence

Recycling Victoria administers a “cap” on the total tonnage of waste which can be incinerated in Victoria. Some WtE projects received EPA licences before the “cap” system was introduced. These “pre-cap” projects have been allowed to continue. They constitute (we understand) around a million tonnes of trash per annum, in total.

When the “cap” was introduced, it was set at one million tonnes per annum (1Mtpa). That is, over and above the pre-cap tonnages already permitted.

On the 10th December 2024, the “cap” was doubled to 2Mtpa (41)

In early 2025 the “cap” was increased again to 2.5 Mtpa.

Each increase was preceded by a sham “consultation”, but the increases were pre-ordained. Government appears to adjust the “cap” at will (41).

De facto, there is no “cap”.

Cap licences issued

Recycling Victoria has concluded the application process for thermal waste to energy cap licences. The Head, Recycling Victoria has determined and issued 7 licences totalling 2,350,000 tonnes per annum to the following waste to energy facility operators, subject to conditions that each licence holder must meet.

Licence holder	Date of issue	Cap amount (tonnes per annum)
Cleanaway Operations Pty Ltd	17 August 2025	760,000
HiQ EFW Victoria Pty Ltd	17 August 2025	750,000
Knox Transfer Station Pty Ltd (location to be confirmed)	17 August 2025	15,000
Liquid Power Co Pty Ltd	17 August 2025	50,000
Melbourne Water Corporation	17 August 2025	450,000
Recovered Energy Laverton Pty Ltd	17 August 2025	280,000
Zerogen Holdings Pty Ltd	17 August 2025	45,000
TOTAL		2,350,000

Any operator not listed above has not received a cap licence from Recycling Victoria. Under the [CE Act](#), a person must not operate a thermal waste to energy facility to process permitted waste in Victoria without a cap licence or an existing operator licence.

Recycling Victoria also administers the distribution of slices of the “cap” to waste incinerator operators who (presumably) apply for their cut. Presumably? Despite our best efforts, we cannot find out who the “cap licence” applicants may or may not have been, and we cannot find out how the “cap licences” are awarded. If a (presumed) cap licence applicant is unsuccessful they are simply “left off the list” of successful licence applicants.

Why did they “fail” ?

And who missed out ?

See RV at <https://www.vic.gov.au/waste-energy-scheme-operating-licences>

No Waste Incinerators in Lara & Greater Geelong Incorporated

Two of the (presumed) applicants for cap licences, Wollert and Sunbury, were awarded cap licences by Recycling Victoria which are about double the tonnages envisaged in their original proposals.

How did that happen ?

Sunbury and Wollert proponents are now re-writing their WtE proposals !

Our questions under Freedom of Information (FOI) have been ignored.

Indeed, the inquiries of the Legislative Council regarding cap licences, have been ignored.

Waste and recycling management

David ETTERSHANK (Western Metropolitan) (10:25): I move:

That this house: [Victoria Legislative Council: Hansard, 29 October 2025, page 4226](#)

- (1) notes the failure of the government to release documents relating to the granting of seven new waste-to-energy licences and the increase of permitted waste to be processed through waste-to-energy facilities to 2.35 million tonnes per annum;
- (2) in accordance with standing order 10.01, requires the Leader of the Government to table in the Council, within 30 days of the house agreeing to this resolution:
 - (a) a copy of each application to Recycling Victoria for cap licences; and
 - (b) a copy of Recycling Victoria's final report or similar documents outlining the calculations and rationale behind the allocations of each cap licence.

See Hansard pages 4226 to 4230 at

<https://www.parliament.vic.gov.au/492be0/globalassets/hansard-daily-pdfs/hansard-974425065-32929/hansard-974425065-32929.pdf>

We do not believe this unresponsive behaviour by government is the result of incompetence.

The "cap" and "cap licence" charade debases any claims to social licence by WtE, and invites suspicion of corruption. That this charade be repeated on an annual basis is simply farcical, and should not be tolerated.

**(1) the suitability of existing WtE infrastructure plans and policies, including –
(c) the regulatory framework to establish and manage WtE facilities;**

Evidence

Victorian authorities such as the EPA often cite the well-intended European EC 2019 BREF waste incineration standards (BATs) as suitably protective of public health and environment from the harms of waste incineration (47).

However, evidence of widespread incinerator toxic pollution has been found in the landscapes and biota around the following locations, where strenuous efforts are made to comply with BREF.....

- Beringen, Belgium (14)
- Harlingen, Netherlands (16)
- Kaunas, Lithuania (12)
- Madrid, Spain (12)
- Paris, France (10, 13, 18)
- Pilsen, Czech Republic (12)
- Turňa nad Bodvou, Slovakia (15)
- Zubieta, Basque Country, Spain (143)
- Various – See Jelinek et alia (2022) (73)

Given similar WtE technologies and feedstocks proposed for Victoria, we expect the same landscape-scale toxic contamination to happen around Lara, Sunbury, Wollert, Dandenong South, Maryvale, and every other similar WtE installation in Victoria.

The oft-heard mantra “strict controls”, “strict controls”, “strict controls” obviously does not apply to the composition of the mixed garbage feedstock of the proposed Victorian waste incinerators.

With uncontrolled inputs, European experience has been that attempting to control the outputs has been fraught.

Simply, “garbage in = garbage out”.

The problem with EC 2019 BREF is that it does not require verification of effectiveness (47).

Our Incorporated Association is firmly of the opinion that EC 2019 BREF is “not fit for purpose” and should not be relied upon as the foundation of Victoria’s WtE regulatory framework (38,47).

(2) the impact of WtE, including from –

(a) separating recycling and organic material from WtE streams;

Evidence

Biological wastes

The first step in waste management reform is to separate biological (organic) wastes from all other wastes.

The separate treatment of biological wastes improves the quality and value of all waste streams.

Dumping of biological wastes directly into landfill is an irresponsible practice, resulting in the production and release of methane (CH₄) to atmosphere, along with objectionable odours possibly including deadly hydrogen sulphide (H₂S) gas. Methane is a much more potent greenhouse gas than carbon dioxide (CO₂). Both CH₄ and H₂S are highly flammable.

Responsible treatment options for biological wastes include:

- Food – for arthropods (e.g. black soldier flies), annelids (e.g. worms), fish (e.g. farmed trout), farm livestock (e.g. pigs) and fungi (e.g. mushrooms)
- Composting – involving aerobic (with oxygen) fermentation
- Anaerobic digestion – fermentation in “low or no oxygen” sealed vessels which capture the methane produced
- Pre-treatment – using some aerobic fermentation prior to anaerobic fermentation, with methane capture.

Where methane (along with a little H₂S ?) is captured, it is a responsible option to recover energy from the gas by burning it in an engine, boiler, gas turbine, or space heater. The exhaust of these burners will contain CO₂ instead of CH₄, and the (traces of) H₂S will become sulphur dioxide (SO₂) – a less pungent compound !

Further separation of non-organic wastes into “purified streams” further improves the quality and value of all waste streams.

(2) the impact of WtE, including from –

(b) nature and management of emissions, waste and ash byproducts;

Evidence

In earlier sections of this submission we dealt with waste incinerator emissions to atmosphere and the consequences for landscapes, waterways, biota including food production, environmental, and public health impacts.

In this section we will focus on the captured and contained incinerator wastes such as fly-ash captured in cyclones and filter bags, and the residue left in the furnace called “incinerator bottom ash” or “IBA”.

Contrary to the advice of Abbas et alia (1,2) the quantity of “ash” generated from combustion of Municipal Solid Waste (MSW) is not 1% (w/w) as claimed, but in the range of 20% to 30%(70). For convenience, we will assume a figure of 25% (w/w).

If Victoria was to incinerate the current “cap” quantity of 2.5 million tonnes of trash per annum, we can expect about $2,500,000 \times 25\% = 625$ kilotonnes of ash residues will need to go “somewhere” each year.

Due to combustion of halogenated plastics mixed with organic matter, these incinerator ashes contain some of the most toxic compounds known to science, including polyhalogenated dioxins and furans, along with some PFAS, and heavy metals (69,70).

At the moment, there is only one facility in Victoria with a licence to accept ash with this level of toxicity. That is, the “Earthsure” Ventia Veolia Joint Venture site in Taylors Road, Dandenong South (44,45). Earthsure does not have the capacity to subject 625 kilotonnes of anything to “thermal treatment”, (45) and we doubt Earthsure has any kind of “thermal treatment” that could render these incinerator ashes “harmless” (26).

“We (Jindrich Petrlík and Lee Bell for IPEN 2020) reviewed almost 300 major studies and articles focused on WI (waste incinerator) residues, and we found that fly ash is used in different ways as a construction material for roads, in river or sea embankments, in cement or bricks and even as amendment to soil in agriculture. All these uses, described in Chapter 5 of this report, result in high risk of dioxin and other POPs (Persistent Organic Pollutants, banned under the Stockholm Convention) releases into the environment and contamination of food chains.” (70)

We have read about the “stabilisation” of incinerator residues by mixing them into concrete and road asphalt for example. Whilst it is true that these long-lived materials are durable, they are not indestructible. Indeed, concrete and roadways remain stable only until the inevitable “demolition”, whereupon their chemistry can be released into the environment (69, 72)

Is this what “Earthsure” and the Victorian government have in mind regarding the fate of incinerator residues” ? Does the Victorian government have anything in mind ?

On the bright side there are suggestions that some metals could be recovered from incinerator ashes. This is easy regarding iron and some types of steel which can be removed by electromagnetic separation.

However, we have yet to see any details regarding the removal of other metals from incinerator ashes. How will that be done ? What physics and chemistries are involved ? Will these metals removal processes carry with them new sets of environmental and public health risks ?

We need to know.

Ominously, EPA Victoria seems tolerant of a wide range of uses for incinerator bottom ash.

“It must be treated to be suitable for use. After IBA has been treated to remove contaminants, it is sometimes called incinerator bottom ash aggregate (IBAA).” (55)

“After IBA has been treated to remove contaminants”

What does that mean ? How would the contaminants be removed ? Removed to where ?

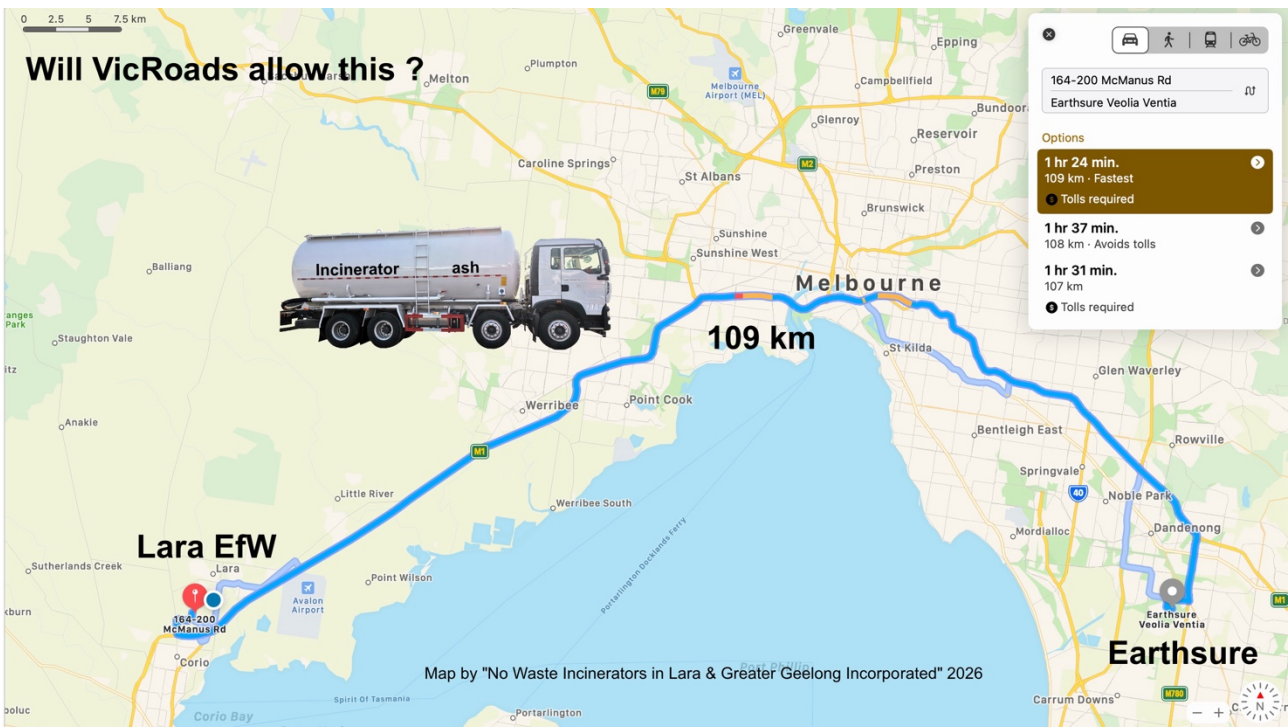
No Waste Incinerators in Lara & Greater Geelong Incorporated

Transportation of incinerator residues

The Earthsure ash disposal facility is near the mooted Dandenong South WtE facility, but far from all the others in Melbourne's "Ring of Fire".



We estimate that it is a 109 km journey from the proposed Lara Energy from Waste facility to Earthsure, via the shortest road route.



No Waste Incinerators in Lara & Greater Geelong Incorporated

However, given the toxic hazardous nature of these ash residues, we anticipate that VicRoads may object.

VicRoads might say “you have to transport the ash residues on roads with less risks to the public.” That is, via a longer route.”

Or, VicRoads might just say “No”, having regard to insurance and legal liabilities if there was to be a “truck rollover accident” involving release of highly toxic incinerator ashes.

VicRoads needs to know.

We need to know.

No Waste Incinerators in Lara & Greater Geelong Incorporated

(2) the impact of WtE, including from –

(c) the cost-benefit of WtE generation to consumers and businesses;

Evidence

Economics and Regulatory Capture

The prime motivation for waste incineration has nothing to do with “running out of landfill”.

This is nonsense.

Rather it has everything to do with “money”.

How much money ?

The Manila Times recently published an article (which we were probably not supposed to see) listing the world’s top ten waste incineration engineering companies and their installed capacities, in “tonnes per annum” (83, 103).

It is a simple matter to multiply those tonnages by a typical incineration fee of (say) \$200 per tonne to get a useful guesstimate of the industry’s potential cashflow.

At a \$200 per tonne incineration fee, we estimate the top ten incinerator operators could potentially have an annual cashflow over \$114,000,000,000.

Rank	Country	Equipment Sales Enterprise	Total capacity (tonnes / day)	Daily cashflow @ A\$200 / tonne
1	China	SUS Environment	304,605	\$60,921,000
2	Germany	Martin GmbH	262,612	\$52,522,400
3	China	Sanfeng Environment	230,000	\$46,000,000
4	China	Everbright Environment	171,060	\$34,212,000
5	Japan	Kanadevia Inova Steinmuller	160,709	\$32,141,800
6	Japan	Kanadevia Inova	151,699	\$30,339,800
7	Japan	Kanadevia	129,364	\$25,872,800
8	China	Huaguang Environment & Energy	67,510	\$13,502,000
9	Japan	Ebara Machinery	54,650	\$10,930,000
10	Japan	JFE System	34,778	\$6,955,600
		Total per diem	1,566,987	\$313,397,400
		Total per annum	571,950,255	\$114,390,051,000

Tonnage data from Manila Times (2025) “Top 10 Global Waste-to-energy Equipment Brands of 2025 Revealed” published 15 August 2025. Available at https://www.manilatimes.net/2025/08/15/tmt-newswire/pr-newswire/top-10-global-waste-to-energy-equipment-brands-of-2025-revealed/2168496?fbclid=IwY2xjawMWk71leHRuA2FibQlxMABicmlkETFBNzJuVGIUNnkMG9PWGJKAR4amYJVdINRrhNAa47WY2dPgKHWrwX8KCLDgOf-HxdaFLgoB9t1_3MxjWXaw_aem_BEnu6DfoELSnrT7x0_yWzw

The gravitational pull of that much money is enough to distort every kind of administrative, regulatory and political process. And we see this in the grovelling willingness of certain authorities to ignore the copious scientific evidence of waste incineration harms, pretending that this evidence does not exist.

The polite term for this behaviour is “Regulatory Capture”.

See for example Wendy Y. Lee (2023) at <https://academic.oup.com/ser/article-abstract/21/2/1217/7030814?redirectedFrom=fulltext&login=false>

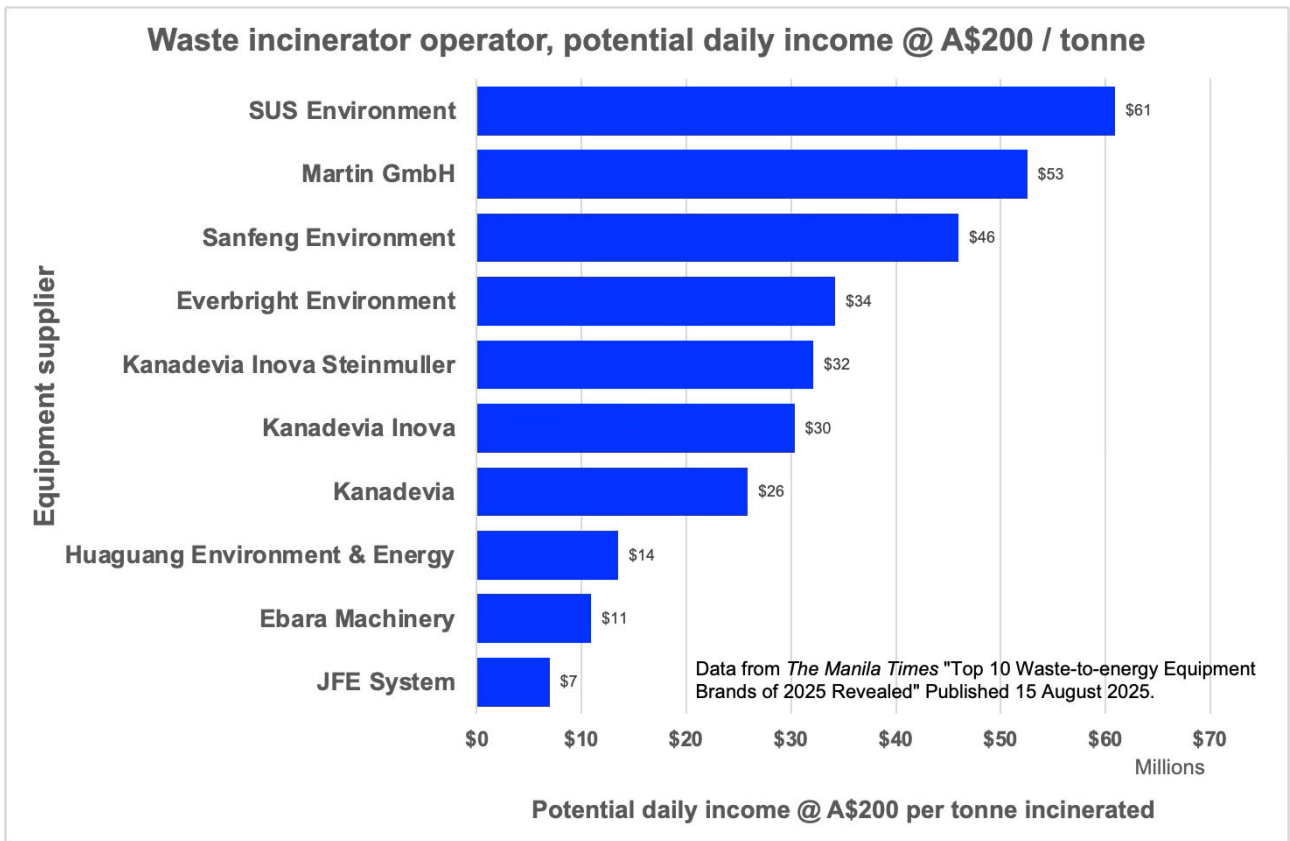
We now understand why it is so very difficult for the Europeans and Americans to get out of waste incineration, try as they might.

The European Union’s official position is as follows;

“The EU has decided that WTE incineration should be excluded from financial support since it is now recognized that it opposes the transition towards a carbon-neutral and circular economy. Instead, higher environmental performance waste management solutions that embrace the zero waste goal, such as waste prevention, reuse and recycling are now encouraged and being financed.” (134)

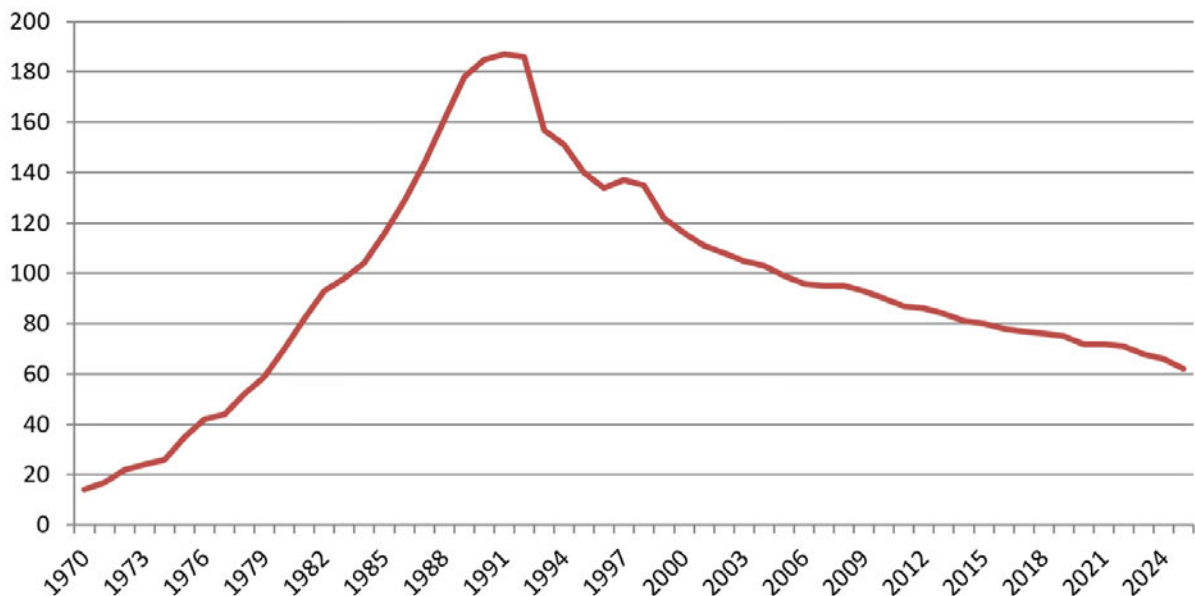
Despite the good intentions, some waste incinerators in Europe and USA are being rebuilt and replaced, regardless.

No Waste Incinerators in Lara & Greater Geelong Incorporated



Meanwhile, the Americans are making some progress (49, 50, 63)

Number of Operating Commercial Trash Incinerators in the U.S.



Energy Justice Network • Mike Ewall • 215-436-9511 • mike@energyjustice.net • www.energyjustice.net/incineration/

No Waste Incinerators in Lara & Greater Geelong Incorporated

With a potential income of around \$114 billion p.a., the industry has a lot to protect !

Is this why the incinerator industry is now seducing malleable politicians in the global south ?

Every proposed major waste management facility (involving incineration or other technology) should be accompanied by

- an Environmental Impact Statement (EIS), (42) and
- a Business Case (38)

In Victoria waste incinerator proponents have ignored this logic, or been excused by the authorities. Why ? See the following notice from the Minister for Planning.

For Public Notice via Internet

REASONS FOR DECISION UNDER *ENVIRONMENT EFFECTS ACT 1978* (Referral Number 2023-R02)

Proponent

Cleanaway Operations Pty Ltd

Project

Melbourne Energy and Resource Centre (MERC)

Description

The project comprises a waste-to energy facility at 510 Summerhill Road, Wollert, known as the Melbourne Energy and Resource Centre (MERC). The MERC will thermally treat approximately 380,000 tonnes per annum of waste feedstock, composing primarily of residual municipal solid waste and residual commercial and industrial waste. The waste to energy process will generate approximately 46.3 MW gross of electricity, with 41.6 MW (328,700 MWh/year) exported to the grid as base load electricity.

Key components of the project are:

- main waste processing building, including the tipping hall, waste bunker, boiler building (utilising moving grate combustion technology), flue gas treatment, residue materials handling and conveyor;
- air pollution control residue stabilisation facility;
- incinerator bottom ash maturation and an incinerator bottom ash processing hall; and
- internal roadways, staff and visitor centre car parking, articulated truck parking area and truck shed, and an A-Doubles decoupling area.

Decision:

The Minister for Planning has decided that an environment effects statement is not required for the MERC waste to energy facility.

Reasons

- The project has potential for effects particularly in relation to air and greenhouse gas emissions and waste, which are unlikely to be significant and/or can be readily managed through existing statutory processes. The development licence and operational licence approval processes under the *Environment Protect Act 2017* will readily enable the appropriate and transparent examination of these potential effects.
- Residual effects on amenity (such as noise and odour) and Aboriginal cultural heritage are unlikely to be significant and can be readily addressed via existing statutory requirements.
- The effects on native vegetation and other biodiversity values are not significant due to the siting of the project on cleared agricultural land. Offsets for limited impacts to native vegetation and biodiversity values can be readily addressed in accordance with policy.

Date of decision: 5 October 2023

OFFICIAL

No Waste Incinerators in Lara & Greater Geelong Incorporated

Tait at alia (2025) have prepared an economic analysis of waste incineration as relevant to the Australian context (115). Tait concludes;

- “WtE-I (Waste to Energy Incineration) should not be relied upon as a significant and enduring component of the energy supply and waste management in the Australian context. Instead, Australian governments need to pursue waste minimisation and diversion policies aggressively;
- Australian state/territory and local governments should more proactively involve communities in waste management planning across the spectrum from reducing to disposal;
- More progressive waste management strategies should be adopted to facilitate the move towards renewable energy and waste minimisation, which have proven to be effective in other settings;
- In particular, governments should much more proactively engage with communities where waste management facilities are to be sited and be much more responsive to the concerns these communities may have;
- Where facilities are built, monitoring of health, social, and environmental impacts is essential.” (114)

We agree !

We need the power ! Yes ?

One of the most attractive features of waste-to-energy is the “energy”.

We studied the claimed electrical output of fifteen existing and (mostly) proposed waste-to-energy facilities mooted for Australia.

We found that the average claimed electrical output from the fifteen facilities was just under 96 watts per tonne of feedstock incinerated.

The “cap” on waste tonnage that can be incinerated in Victoria is currently set at 2.5 million tonnes per annum (tpa).

At 96 watts per tonne, and 2.5 million tpa incinerated. we calculated that the expected total output would be about 239 megawatts, which is just under one percent of the planned generating capacity of the State Electricity Commission (SEC), by the year 2035 (107).

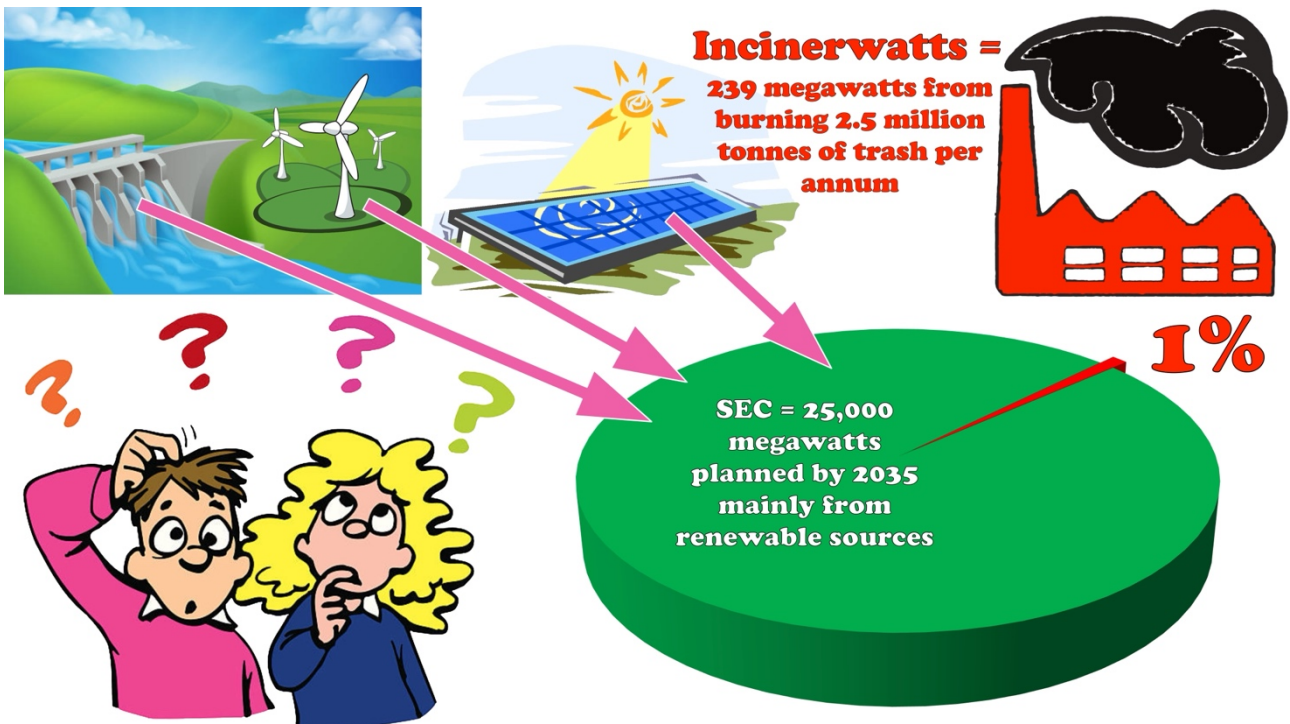
By the year 2035, the SEC should be generating most of its power from renewable energy sources with little or no greenhouse gas emissions (e.g. wind, hydro-electric, and solar photovoltaic). Adding electrical power from waste incinerators to the SEC grid, runs contrary to Victorian government policy to reduce net greenhouse gas emissions to zero by the year 2040 (39).

No Waste Incinerators in Lara & Greater Geelong Incorporated

State	Location of proposed WtE incinerator	Claimed capacity tonnes per annum (tpa)	Claimed electrical output megawatts (MW)	watts per tonne	Reference1
NSW	Matraville	165,000	25.0	151.52	https://nomoreincinerators.wordpress.com
NSW	Parkes	600,000	60.0	100.00	https://parkesenergy.com.au/wp-content/uploads/2025/05/Project-overview-and-FAQs_250505.pdf
NSW	Tarago Woodlawn	380,000	30.0	78.95	https://www.anz.veolia.com/en-au/our-facilities/energy-from-waste/woodlawn
NSW	Wallerawang / Lithgow	500,000	52.5	105.00	https://9now.nine.com.au/a-current-affair/lithgow-community-calls-out-waste-incineration-plan/24fd86d5-a174-4374-9a8e-f6f0af9ad876
NSW	Eastern Creek	500,000	58.0	116.00	https://lgi.com.au/wp-content/uploads/2025/01/LGI-EasternCreek-Case-Study_2025_V2.pdf
Qld	Bromelton	760,000	73.0	96.05	https://www.cleanaway.com.au/bromelton-energy-and-resource-centre
Qld	Ipswich Swanbank	500,000	50.0	100.00	https://www.statedevelopment.qld.gov.au/coordinator-general/assessments-and-approvals/coordinated-projects/projects-discontinued-or-on-hold/remondis-waste-to-energy-facility
Vic	Dandenong South (GSWT)	100,000	7.9	79.00	https://engage.vic.gov.au/project/epa-development-licences/page/GSWT
Vic	Lara	400,000	35.0	87.50	https://prospecthill.com.au
Vic	Laverton North	240,000	20.0	83.33	https://www.recoverenergy.com.au
Vic	Maryvale	710,000	70.0	98.59	https://opal.sonardev.com.au/app/uploads/2025/06/250505-Maryvale-EfW-stakeholder-update-May_final.pdf
Vic	Sunbury	300,000	46.3	154.33	https://hiq.au/eco-hub/
Vic	Wollert MERC	760,000	46.3	60.92	https://www.cleanaway.com.au/melbourne-energy-and-resource-centre
WA	East Rockingham	330,000	28.9	87.58	https://arena.gov.au/projects/east-rockingham-waste-to-energy/
WA	Kwinana	460,000	38.0	82.61	https://kwinana.energy
Totals		6,705,000	640.9		

Project rejected	Calculations	
Project approved	Cap - Victoria	2,500,000.00 tonnes of garbage per annum permitted for incineration in Victoria
	Actual tonnage allocated to incinerator operators	2,350,000.00 tonnes total licences issued by Recycling Victoria, 20 August 2025
	Expected (average) watts per tonne from incinerating waste	95.59 watts per tonne
	Generating capacity from burning cap tonnage	238.96 megawatts from burning 2.5 megatonnes of garbage
	Planned generating capacity of Vic SEC by 2028	2,600.00 megawatts = 2.6 gigawatts
	Cap WtE output as % of Vic SEC 2028 target	9.19 percent of 2.6 gigawatts
	Planned generating capacity of Vic SEC by 2035	25,000.00 megawatts = 25 gigawatts
	Cap WtE output as % of Vic SEC 2035 target	0.96 percent of 25 gigawatts

Incinerwatts



But it gets worse

Waste incineration facilities, especially of the waste gasification type, are well known for their frequent shutdowns due to planned and unplanned maintenance. Rollinson (2018) reports that waste gasification plants are notorious for fires, explosions, and other misadventures (104, 105)

During these outages, we can expect the WtE electrical power production to be zero.

Rather than humming “baseload power” we expect that waste incinerator power generation would be intermittent or just plain “unreliable”. Does the SEC want this connected to its grid ?

No Waste Incinerators in Lara & Greater Geelong Incorporated

The language around this subject is also interesting.

Most of the WtE proposals we have seen make the claim that “the facility will produce enough electricity to power XX,000 homes”. But they do not say that the WtE facility will actually power XX,000 homes.

Consider Lara. The proponents of the Lara EfW plant, Prospect Hill International (PHI), claim that the Lara EfW facility will produce 35 megawatts, “enough to power up to 50,000 homes” (58).

Strangely, the Lara documentation includes no details about how those 35 megawatts would be supplied to those 50,000 homes or any homes.

A theory which we find plausible is that there never was any intention “to supply 35 megawatts to 50,000 homes”, because the Lara EfW facility might consume ... about 35 megawatts itself. We don't know that, but the documentation we have seen from PHI does not clarify this question (58).

Why publish plans to spend millions on poles and wires when they are not going to be used ?

Why declare a “relationship” between a WtE facility and an electricity wholesaler when there was never any intention to supply power to any wholesaler ?

Despite the very small potential contribution of incinerwatts to the SEC grid , we seriously doubt that any significant proportion of the electrical power generated would actually be made available for consumption by the consumers off the incinerator site.

- (3) **alternative waste management approaches and emerging technologies that also align with circular economy principles, having regard to the recommendations of the Environment and Planning Committee's 2020 Inquiry into recycling and waste management and the role of WtE in the Victorian Government's circular economy plan, including Victoria's landfill management, capacity and strategy;**

Evidence

The "We are running out of landfill" confected crisis

"The Victorian State Government, through Recycling Victoria, has established a clear policy that no new landfills will be permitted. The intention is for residual waste to be transferred to EfW facilities, as part of the transition to a circular economy."

(30)

So reads page 49 of the minutes of the Geelong City Council meeting of 09 December 2025 (30).

In fact, there is no "prohibition" on the establishment of new landfills in Victoria, but the Victorian government has made it more difficult to establish new landfills.

So, are we running out of landfill sites ?

Most landfills in Victoria begin as disused quarries.

So, are we running out of quarries ?

Certainly not. According to Geoscience Australia there are 193 active quarries in Victoria.

Over time, every one of those active quarries will become inactive, as the mined resource is depleted, or becomes uneconomic to mine.

In addition, there are plenty more old disused quarries, but we do not have data on the numbers of those.

To put it plainly, our Incorporated Association is firmly of the opinion that there is no "landfill crisis": that the so-called "landfill crisis" was entirely confected to funnel as much waste into WtE facilities as soon as possible, for reasons we believe are unlikely to survive any test of probity.

No Waste Incinerators in Lara & Greater Geelong Incorporated

Search Assist



As of October 2025, the number of quarries in Australia by state is as follows: Queensland has 237, New South Wales has 203, Victoria has 193, Western Australia has 76, South Australia has 70, Tasmania has 18, Northern Territory has 7, and the Australian Capital Territory has 2. [bytescraper.com](#) [rentechdigital.com](#)

More ▾



Number of Quarries in Each State of Australia

STATE/TERRITORY	NUMBER OF QUARRIES
Queensland	237
New South Wales	203
Victoria	193
Western Australia	76
South Australia	70
Tasmania	18
Northern Territory	7
Australian Capital Territory	2

As of October 2025, there are a total of 830 quarries across Australia, with Queensland having the highest number.

[bytescraper.com](#)

[ga.gov.au](#)

A circular economy plan contaminated

The Victorian Government's broader so-called "circular economy plan" has become so contaminated with gibberish about incineration that it needs to be scrapped and replaced by Zero Waste solutions (130, 142)

That said, some worthy Zero Waste initiatives from Sustainability Victoria are in progress (113)

Unfortunately, following the Silver Review, the Victorian government has decided to scrap Sustainability Victoria, and we are not clear about the continuation of its programs. Regardless, "Victoria's 4-bin waste system", and the current "Container Deposit Scheme" should continue, with greater support from government (112). See also <https://www.vic.gov.au/container-deposit-scheme>

No Waste Incinerators in Lara & Greater Geelong Incorporated

The Europeans have put considerable effort into Zero Waste solutions. In their 2023 publication, “The winning formula for cities” (139), Zero Waste Europe (ZWE) says ...

“D2D = Door to door collection. Within European waste management today, it is clear that collection models which operate by collecting several separated waste streams from the doorstops of households and businesses deliver the best results. [Separate collection is mandated by European Union law](#) and includes the collection of separated paper/cardboard, plastics/metals/drinking containers, glass and waste oils – with the last two often collected in street containers or at specific collection points, rather than from the household for operational reasons. From 2024, it will be mandatory to collect organic waste separately and from 2025, textiles and hazardous waste will also be required to be separately collected.

We have vast amounts of [evidence](#) from our Zero Waste Cities built over the last 15 years, that door-to-door (D2D) collection models bring the best performance in terms of the quantity and quality of recyclable material collected. [As our recent research has shown](#), these models also deliver the best results for organics specifically, which in turn have a positive knock-on effect on the wider system.

With effective door-to-door collection of these materials, supported by some educational awareness activities, [municipalities can establish a system to easily surpass the minimum required targets for recycling](#) – 55% by 2025, 60% by 2030, and 65% by 2035.” (139)

ZWE goes on to say that other demonstrably effective waste management strategies include;

- PAYT or “Pay-As-You-Throw”
- DRS or “Deposit Return Systems”, and
- MSW or “Mixed Waste Sorting” (139)

“No time to waste” (36)

Our Incorporated Association is firmly of the opinion that the lead authority on the management of wastes throughout Australia should be the Commonwealth Department of Climate Change, Energy, Environment and Water (Com. DCCEEW), assisted by the Commonwealth Scientific and Industrial Research Organisation (CSIRO) (34,35,36).

(4) the adequacy of community consultation;

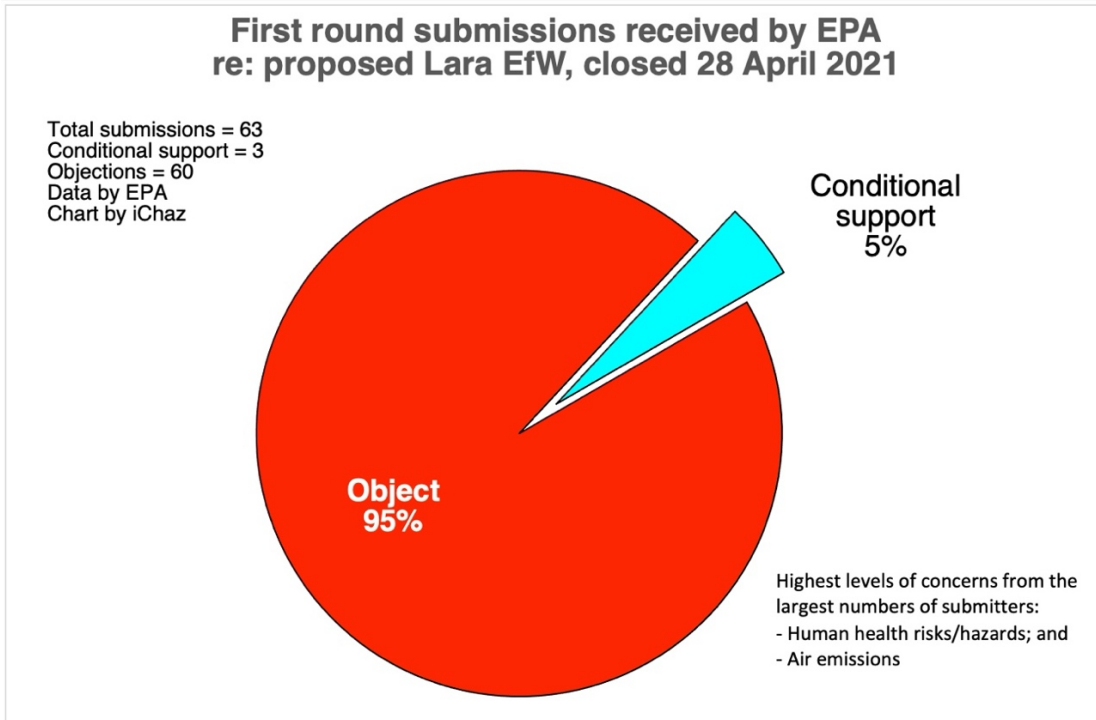
Evidence

EPA calls for submissions from the public regarding the Lara Big Incinerator proposal.

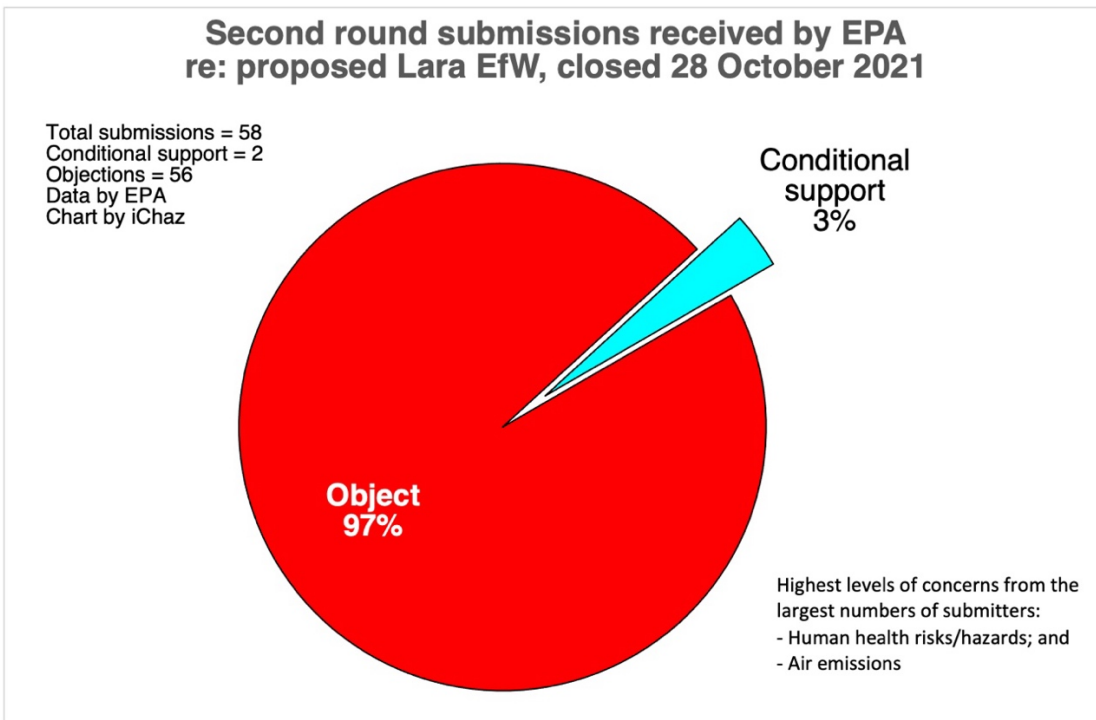
For the Lara EfW project, the Environment Protection Authority Victoria (EPA) three times called for written submissions from the public (52, 58).

And ignored them all (54).

First round



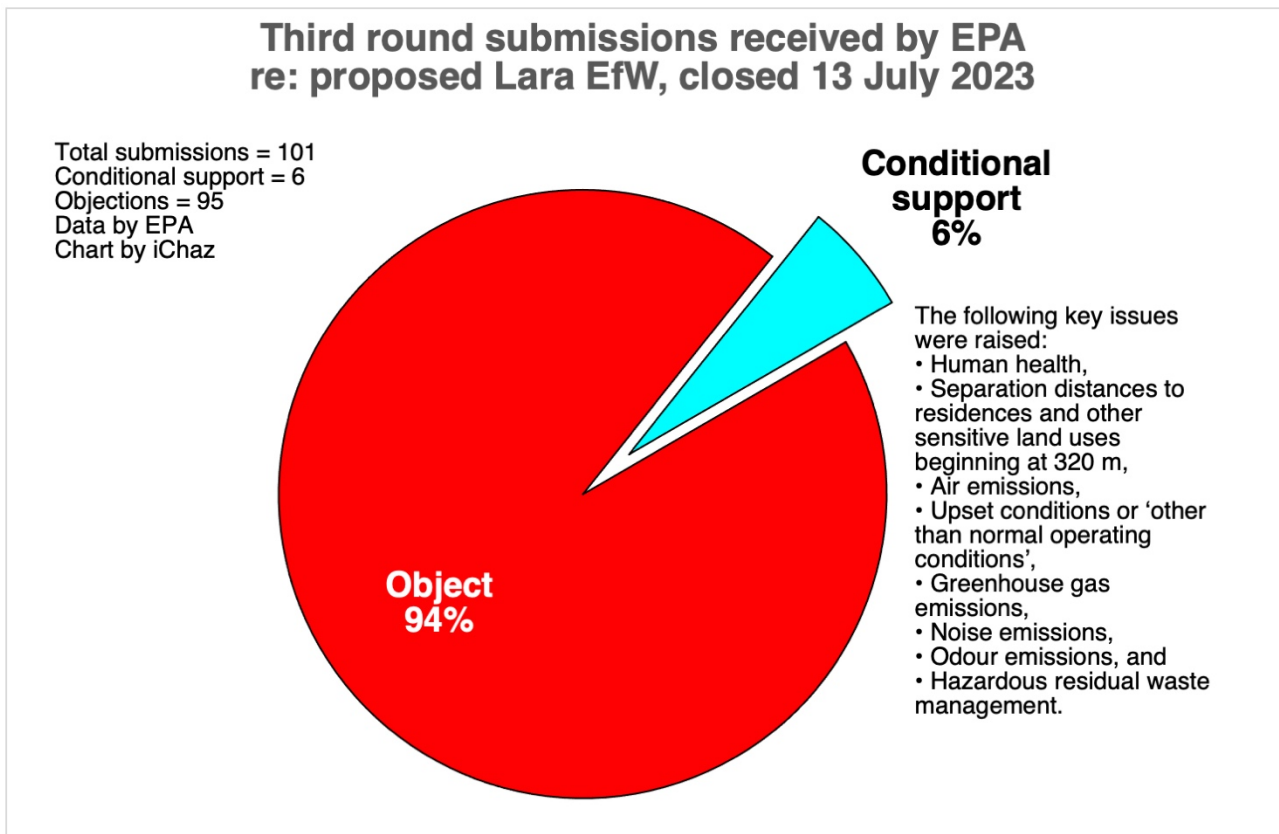
Second round



No Waste Incinerators in Lara & Greater Geelong Incorporated

Third round

The EPA called for a third round of public submissions in mid-June 2023.



Up to this point, concerned citizens and organisations expected that the Lara Big Incinerator proposal would die a natural death under the weight of its own stupidity.

Stupidity ? The land purchased for the Lara Big Incinerator site is on the eastern side of McManus Road, Lara on the western side is the huge Viva LPG gas terminal containing thousands of tonnes of liquified petroleum gas.

Incinerator ? Gas terminal ?

What could possibly go wrong !

No Waste Incinerators in Lara & Greater Geelong Incorporated



See <https://www.youtube.com/watch?v=NXs0PtyN-Es>

Based on this fact alone, the EPA should have dismissed the PHI application for a Development Licence, without doubt.

However

It was the EPA's call for a third round of submissions which set off the alarms in our communities.

"Why is the EPA still thinking about this nonsense?"

The EPA provided a little more documentation for this third round. With its lack of remedial actions regarding the vast majority of community concerns already raised, we formed the opinion that neither Prospect Hill International, nor the EPA had taken our concerns seriously. Our perception was that the proposal itself hardly changed between inception and round three, despite a vast multitude of obvious deficiencies, which we had reported.

"Why is the EPA still thinking about this nonsense?"

That question dominated community sentiment until 06 December 2023, when the EPA granted the Lara Big Incinerator proposal Development Licence DL000300041.

The community was outraged.

No Waste Incinerators in Lara & Greater Geelong Incorporated

OFFICIAL

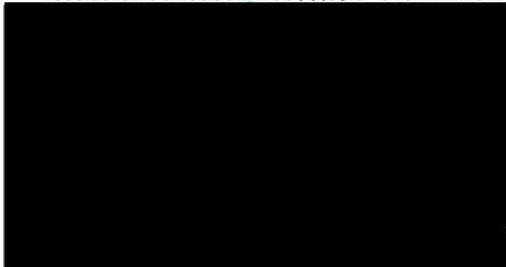


Development licence

Environment Protection Act 2017

Licence number	DL000300041
Issue date	6 December 2023
Last amended	
Expiry date	1 December 2029
Licence holder	PROSPECT HILL INTERNATIONAL PTY. LTD.
ACN	617544244
Activity site(s)	164-200 McManus Road, Lara, Victoria, 3212, Australia
Prescribed permission activities	A08 (Waste to energy)

Issued under section 69(1)(a) of the *Environment Protection Act 2017* (the Act).



ty Victoria (EPA)

epa.vic.gov.au

Environment Protection Authority Victoria
GPO BOX 4395 Melbourne VIC 3001
1300 372 842



What followed was public demonstrations, community meetings, petitions, an appeal at VCAT by Bisinella Developments Ltd., and copious political action which continues with vigour to this day.

It was clear to us that our numerous submissions, and all the submitted scientific evidence counted for nought.

No Waste Incinerators in Lara & Greater Geelong Incorporated

Wednesday 12 December 2023, EPA officials convened a community meeting at the Lara Golf Club to explain their licence approval decision.

Speakers for the EPA were:

- Con Lolis, who signed the Development Licence, and
- Professor Mark Patrick Taylor, then Chief Scientist of EPA Victoria

There were no personnel from Prospect Hill International present at this community meeting. We considered the absence of PHI a disgrace.

The EPA was left to “carry the can” alone.

Our perception? The audience was even more angry at the end of this session than at the beginning.

The EPA did get one thing right, though. The EPA stated that all our submissions were “lucid”.

Conference of Interested Persons 13 July 2021 at Lara

After the first round of submissions (and the obvious great weight of community opposition), the EPA convened an “s236 Conference of Interested Persons” 13 July 2021, at the Lara Masonic Hall (52).

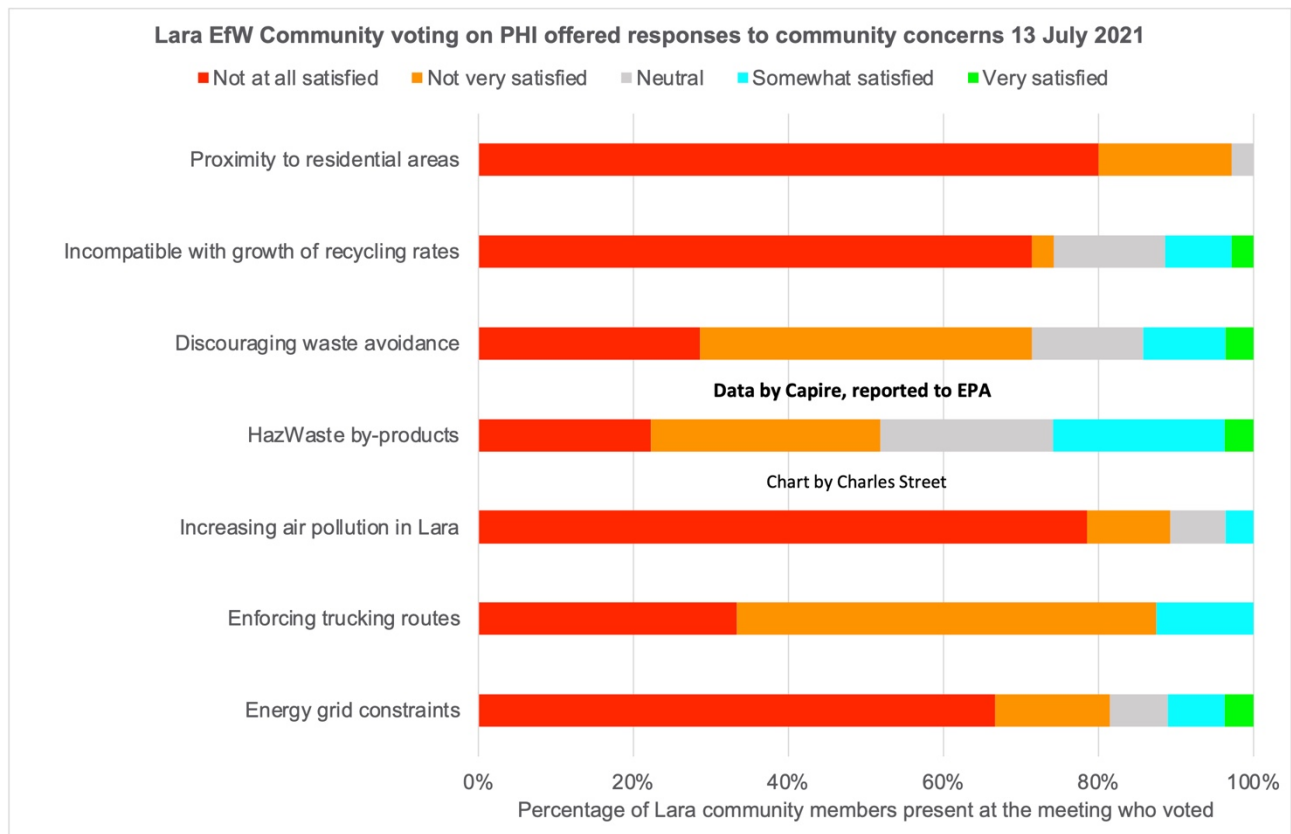
Fifty nine members of the public attended (not more, because of COVID 19 restrictions on public meetings.) The event was “moderated” by consulting firm “Capire”. A report on the conduct of the event was published by Capire 27 July 2021 – available from the EPA on request. We call this “the Capire report” (52).

Capire organised brainstorming with butcher’s paper to record community concerns.

Capire then summarised the concerns and put them to the PHI consultants “Jacobs” for responses.

Jacobs then explained the responses to the audience. The audience was asked to vote to indicate their approval of the responses from Jacobs.

We have taken Capire’s data and expressed it in graphical form as follows:



No Waste Incinerators in Lara & Greater Geelong Incorporated

The data also show that about half the attendees did not vote. We suggest that this reluctance to vote could be due to a lack of detailed knowledge about what was being proposed, and the technically complex nature of the subject.

None of the officials of Prospect Hill International spoke to the audience, except for one of the (then) PHI Directors, Kenneth Maurice Smith, formerly Speaker of the Victorian Legislative Assembly.

Lack of detail ? Our quick examination of the 1900 page Prospect Hill International proposal easily uncovered 25 instances of the expression “The design of the facility will be developed during the detailed design phase” and similar expressions (58).

Without a completed design, the EPA still granted the proposal a Development Licence, 06 December 2023 albeit with thirteen pages of “conditions”.

What did the EPA approve ? We don't know. We believe the EPA does not know.

PHI Lara EfW Community Q&A in small groups 29 May 2024 at Lara

Wednesday 29 May 2024, Lara EfW proponents Prospect Hill International conducted a series of short “community information sessions” for small groups of citizens.



Prospect Hill International

Lara Energy from Waste Project

Community Question and Answer Sessions

Community Question and Answer Sessions

We are holding sessions in May to provide an opportunity for the community to ask the Project team questions, raise concerns and provide feedback.

Location: Lara Golf Club,
125 Elcho Road, Lara,
VIC 3212

Date: Wednesday 29 May 2024

- **Session 1:** 12.00pm – 1.00pm
- **Session 2:** 1.30pm – 2.30pm
- **Session 3:** 3pm – 4pm
- **Session 4:** 4.30pm – 5.30pm
- **Session 5:** 6pm – 7pm

Sign up information

To sign up for a session, please select a one-hour timeslot at:
<https://prospecthill.eventbrite.com.au>

Please note, to allow all attendees the opportunity to provide feedback, the sessions will be limited to 15 people.

You will receive a ticket to confirm your attendance.

For more information

Call: 1300 060 008
Email: info@prospecthill.com.au
Website: <https://prospecthill.com.au>



Afterwards, we interviewed many of the attendees and recorded comments as follows:

- No management level PHI staff were present, so no decisions could be made.
- The PHI consultants “Jacobs” provided information, and answers to all questions.
- There were “observers” with unknown credentials present at each session.
- Some of the questions were not answered.
- Some of the answers provided by “Jacobs” were not consistent with the published scientific evidence that we have seen.

Of the attendees we interviewed, none were satisfied.

No Waste Incinerators in Lara & Greater Geelong Incorporated

These Q&A sessions were a public relations disaster for PHI. But PHI could still go to government and claim “we did community consultation”.

Meanwhile, the protest we were running a hundred metres away on Elcho Road outside the Golf Club, was loud enough to intrude into these “PHI Q&A sessions”, causing distraction inside.



No Waste Incinerators in Lara & Greater Geelong Incorporated

à

Timeline

The timeline below provides a history of not only the community consultations that were provided to us by the proponents Prospect Hill International and the Environment Protection Authority, but also the community consultations provided by us, our not-for-profit volunteer community group, and partners, to the public.

Year	Date	Action
2015	20 Nov 15	Prospect Hill International Pty. Ltd. (PHI) purchases land at 164-200 McManus Road, Lara, from the City of Greater Geelong (CoGG) under an s173 agreement.
2020	02 Dec 20	PHI applies for a Planning Permit. PA2001035.
2021	17 Feb 21	PHI lodges works approval application (WAA) with EPA for an energy-from-waste facility at the subject land ('development licence application). WAA developed by consultants "Jacobs".
	10 Mar 21	Environment Protection Authority (EPA) accepts licence applications from PHI.
	24 Mar 21	First EPA Public submissions period opens. Online Q&A opens.
	20 Apr 21	Online information session held by PHI
	28 Apr 21	First EPA Public submissions period closes. Online Q&A closes.
	28 Apr 21	City of Greater Geelong (CoGG) publishes Referral Report.
	12 May 21	EPA Request to PHI for information – statutory clock paused.
	01 Jul 21	Environment Protection Act 2017 commences.
	01 Jul 21	Planning Permit application public notice issued.
	13 Jul 21	EPA / Capire community "Conference of Interested Persons" at Lara.
	13 Oct 21	EPA Second public submissions period opens.
	28 Oct 21	EPA Second public submissions period closes.
2023	22 Jun 23	EPA's "comment period" accepts public submissions.
	13 Jul 23	EPA's "comment period" closes.
	21 Aug 23	Team Lara (TL) and Geelong Sustainability (GS) conduct a public meeting at the Lara Golf Club.
	20 Sep 23	TL & Friends Community Voice rally at Austin Park Lara.
	01 Nov 23	TL protest rally at EPA offices, Mackey Street, North Geelong.
	06 Dec 23	EPA publishes decision to grant Development Licence DL000300041

No Waste Incinerators in Lara & Greater Geelong Incorporated

	12 Dec 23	EPA conducts public meeting in Lara.
	22 Dec 23	Bisinella Developments lodges an appeal against the EPA licence Development Licence at VCAT.
	29 Dec 23	The due date for any third party application for review at VCAT (being 15 “clear days” from the date of the decision to grant to the Development Licence). Team Lara does not lodge an appeal at VCAT due to lack of understanding and resources.
2024	22 Feb 24	“No Waste Incinerators in Lara & Greater Geelong” is incorporated.
	06 Mar 24	Perrett / Mansfield anti-incinerator petition #534 debated in the Legislative Council. Videos available.
	18 Apr 24	Perrett / Mansfield anti-incinerator e-petition #499 presented to the Legislative Council.
	29 May 24	Member Statement by Hon. Ella George MP to the Legislative Assembly. Video available.
	29 May 24	Prospect Hill International Q&A sessions at Lara Golf Club, accompanied by community protests organised by “No Waste Incinerators in Lara & Greater Geelong Incorporated”.
	06 Jun 24	No Waste Incinerators in Lara & Greater Geelong Incorporated, alternatively Charles Street, refused joinder to the VCAT proceedings. Chaz only permitted to be an “Interested Person”.
	04 Aug 24	Major Community Unity Event at Austin Park Lara, with supporting speakers from the Liberals, Labor, Greens, Socialist Alliance, local residents and business.
	23 Oct 24	All campaigns, anti-incinerator Rally at Jeff’s Shed, Melbourne.
	13 Nov 24	Big Business Breakfast at Kardinia Park Stadium. Consideration of the Lara Big Incinerator proposal and presentation of some alternatives.
	10 Dec 24	Treasurer Tim Pallas doubles the cap on waste incineration in Victoria from one to two million tonnes of garbage that can be incinerated per annum.
	16 Dec 24	Treasurer Tim Pallas announces retirement from politics.
	17 Dec 24	Whittlesea Council resolves to oppose Wollert Big Incinerator.
	19 Dec 24	Commonwealth DCCEEW publishes “Australia’s Circular Economy Framework”. See https://www.dcceew.gov.au/environment/protection/circular-economy/framework
	19 Dec 24	Hon. Jaclyn Symes MP replaces Tim Pallas as Treasurer.
2025	28 Jan 25	Geelong City Council unanimously resolves to oppose the Lara Big Incinerator. See https://www.geelongaustralia.com.au/planning/news/item/8dd405035393300.aspx
	08 Feb 25	Werribee by-election to replace retired Member for Werribee and Treasurer, Tim Pallas. Labor’s John Lister elected with a small margin.

No Waste Incinerators in Lara & Greater Geelong Incorporated

05 Mar 25	Hon. Ella George MP (2025) "Member Statement to Parliament" 05 March 2025. Video available.
16 Mar 25	Hon. Richard Marles & Hon. Ella George (2025) Video presentation at Lara Big Incinerator site, McManus Road, Lara. 16 March 2025. See https://www.facebook.com/share/r/1C3h2kAQar/
20 Mar 25	Engage Victoria consultation "Striking the right balance" launched to increase the cap on the quantum of waste that can be incinerated in Victoria to 2.5 or 3 million tonnes per annum.
31 Mar 25	VCAT "Merits Case" P1642/2023 adjourned until September, but no further hearings took place.
15 Apr 25	Senate Environment and Communications References Committee publishes "No Time to Waste" <i>"This report outlines compelling evidence that we are not winning the war on waste and that our current and historic federal policy framework has failed to achieve its objectives."</i>
17 Apr 25	Engage Victoria consultation "Striking the right balance" closed. Decision expected June 2025.
03 May 25	Federal election. Labor's Hon. Richard Marles MP, re-elected as the Member for Corio.
28 May 25	Rally and debate at Parliament against the proposed Hampton Park waste transfer station which would feed the Maryvale Big Incinerator. Petition sponsored by Ann-Marie Hermans MLC.
20 Jun 25	Bisinella appeal at VCAT against lawfulness of EPA Development Licence refused. See https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/vic/VCAT/2025/159.html
16 Jul 25	Waste to Energy cap regulations amended to allow incineration of 2.5 million tonnes of garbage per annum. See https://www.legislation.vic.gov.au/in-force/statutory-rules/circular-economy-waste-reduction-and-recycling-waste-energy-scheme/003
20 Aug 25	Recycling Victoria announces cap licences for waste incineration. See https://www.vic.gov.au/waste-energy-scheme-operating-licences Lara did NOT receive a cap licence, but we do not know if they applied.
20 Aug 25	"Stop the Lara Incinerator: Community Update" at the Lara Golf Club. See https://www.facebook.com/events/1423323915660130?acontext=%7B%22event_action_history%22%3A%5B%7B%22surface%22%3A%22group%22%7D%5D%7D
29 Oct 25	Anti-incinerator Rally at Jeff's Shed Melbourne attended by representatives of all anti-incinerator groups in Victoria.

No Waste Incinerators in Lara & Greater Geelong Incorporated

	29 Oct 25	<p>David ETTERSHPANK (Western Metropolitan) (10:25) in the Legislative Council:</p> <p>I move that this house:</p> <p>(1) notes the failure of the government to release documents relating to the granting of seven new waste-to-energy licences and the increase of permitted waste to be processed through waste-to-energy facilities to 2.35 million tonnes per annum;</p> <p>(2) in accordance with standing order 10.01, requires the Leader of the Government to table in the Council, within 30 days of the house agreeing to this resolution:</p> <p style="padding-left: 40px;">(a) a copy of each application to Recycling Victoria for cap licences; and</p> <p style="padding-left: 40px;">(b) a copy of Recycling Victoria’s final report or similar documents outlining the calculations and rationale behind the allocations of each cap licence.”</p> <p>Motion agreed to Wednesday 29 October 2025.</p> <p>See Hansard pages 4226 to 4230 at https://www.parliament.vic.gov.au/492be0/globalassets/hansard-daily-pdfs/hansard-974425065-32929/hansard-974425065-32929.pdf</p> <p>Documents provided as of 03 March ‘26 ? Zip, zilch, zero, nought and nothing.</p>
	09 Dec 25	<p>Geelong City Council resolves to oppose “waste incineration”, whilst approving “waste gasification”, “waste pyrolysis” and the entire suite of waste cooking / burning options proposed by Recycling Victoria.</p> <p>Council report prepared in secret, and approved by Council without community consultation, and in our absence.</p> <p>Council maintains the fiction that there has been “no change of policy”, and accordingly “no community consultation was required”.</p> <p>See pages 49 to 53 in Council Minutes at https://www.geelongaustralia.com.au/common/Public/Documents/8de34113de55de7-councilmeetingminutes-9december2025.pdf</p>
2026	13 Feb 26	<p>Victorian Legislative Council “Waste-to-Energy Inquiry” open to submissions until 03 April 2026.</p> <p>See https://www.parliament.vic.gov.au/wastetoenergyinquiry#terms</p>
	18 Feb 26	<p>Legislative Council debate regarding the petition against a waste incinerator in Sunbury. Petition sponsored by David Ettershank MLC.</p>
	17 Mar 26	<p>Lara Big Incinerator project still has EPA Development Licence DL000300041. Planning Permit application PA2001035 still unresolved. Cap licence could be granted by Recycling Victoria at any time, because we CANNOT find out how those cap licences are awarded.</p>
	18 Mar 26	<p>Legislative Council debate regarding the Statewide petition against waste incineration. Petition sponsored by Dr. Sarah Mansfield MLC.</p>
	03 Apr 26	<p>Victorian Legislative Council “Waste-to-Energy Inquiry” submissions period closes.</p> <p>See https://www.parliament.vic.gov.au/wastetoenergyinquiry#terms</p>

No Waste Incinerators in Lara & Greater Geelong Incorporated

	01 Jul 26	NEPA National Environmental Protection Agency commences. See https://www.legislation.gov.au/C2025A00069/asmade/text
	28 Nov 26	State election is due.

No Waste Incinerators in Lara & Greater Geelong Incorporated

Non answers

Our members have written to Ministers objecting to Lara and other incinerator projects so many times that we lost count long ago.

The standard response is usually “no response”.

If, on rare occasions we do get an answer, it is a condescending regurgitation of government policy regarding waste-to-energy and its “net benefits to the community” whatever they are.

These rare responses from “Ministers” (written by public servants who affix an electronic facsimile of the Minister’s moniker), have no sympathy for our concerns.

It gets worse.

We have from time to time written to our local members of Parliament asking them to write to the Ministers concerned.


They do.

And usually get the same response.

No response.

The image shows a rare exception, sent from the Environment Minister’s office, six months after the Member for Lara Hon. Ella George MP sent her request on behalf of her constituents.

Thanks for trying Ella.

 Steve Dimopoulos MP

Minister for Environment
Minister for Tourism, Sport and Major Events
Minister for Outdoor Recreation

PO Box 500
East Melbourne VIC 3002

[Redacted]

Dear [Redacted]

Thank you for your letter of 23 August 2024 forwarded by Ella George MP, Member for Lara, about the Prospect Hill International (PHI) proposal to construct a waste to energy facility at Lara.

The Victorian Government supports waste to energy projects where they create clear net benefits and complement efforts to reduce and recycle waste. Waste to energy technologies can help Victoria achieve better waste management outcomes as we shift to a circular economy. Our first priority is to protect human health and the environment, and reduce, reuse and recycle waste.

Environment Protection Authority Victoria (EPA) granted PHI a development licence for a waste-to-energy facility at Lara on 6 December 2023. This allows the company to design, construct, and commission the facility under EPA oversight. Separate regulatory approvals will be required for the operation of the site when construction is completed to the required standards.

EPA has imposed strict conditions on the development licence to manage potential risks to human health and the environment. If the company fails to meet the conditions imposed by EPA, the project will cease because it has not met the requirements in the development licence. These conditions include that the company must:

- develop and implement a community engagement plan for the life of the project to ensure the Lara community is kept up to date
- use the best available techniques and technology and meet internationally recognised environmental performance standards in designing and constructing the facility
- obtain independent environmental auditor review and EPA approval at each phase of detailed design, construction and commissioning of the facility
- publicly report on emission monitoring results
- implement management controls for noise, odour and residual waste.

EPA works with applicants as part of the licensing process to ensure that all the material matters required for the assessment are adequately covered. This ensures EPA’s assessment of licence applications are rigorous, comprehensive and science-based to ensure risks to human health and the environment are managed – as expected by the Victorian Government and the community.

In assessing the application, EPA conducted 3 rounds of public consultation and a conference of interested parties, as well as a detailed technical assessment of the application based on the latest science. It sought further information from the company during the assessment process.

EPA approved the development licence, following this comprehensive process, because it was satisfied the requirements of the *Environment Protection Act 2017* were met and the assessment showed risks to community were low and acceptable.

The development licence application approved by EPA made clear that the proposal was based on the processing of local municipal waste only – international and interstate waste will not be accepted. In general, interstate importation of waste requires EPA approval and international importation requires federal approvals under the Basel convention.

It is EPA’s opinion that an air quality study in Lara is not required because data available from existing Geelong monitoring stations provides a good picture of air quality in Lara. EPA scientists conducted a technical review of the air emissions modelling and assessments done as part of the development licence application process. It showed air quality in Lara was unlikely to be impacted by the operation of the PHI waste to energy facility.

EPA will consider air quality monitoring requirements it imposes on the company in any operating licence that is applied for, should the project progress to that stage.

The Development Licence Assessment Report is a public document published on the Engage Victoria website at <https://engage.vic.gov.au/prospect-hill-international-pty-td-lara>. It provides a detailed and accessible analysis of GHG emissions, noting Parts 6.2.2, 7.1, Tables 12, 13 and 14. The GHG emissions are calculated using a GHG Inventory prepared in accordance with the GHG Protocol and International Standard ISO 14064-1 (2006).

Separate to the EPA development licence, approval of the planning permit application (number: APP1004200) by the Minister for Planning will be required before the plant could be constructed, as well as a waste to energy cap license issued by the Head, Recycling Victoria. The decision as to whether there should be an Environmental Effects Statement (EES) process for future waste to energy facilities is a matter for the Minister for Planning.

Thank you for writing to me. I trust this information will be of assistance.

Yours sincerely


[Redacted signature]

Steve Dimopoulos MP
Member for Oakleigh
Minister for Environment

2512125

[Redacted]

Page 2
Official



No Waste Incinerators in Lara & Greater Geelong Incorporated

Beyond Lara

“No waste incinerators in Lara & Greater Geelong Incorporated” has also attended many “community consultations” regarding waste incinerators proposed for Wollert and Sunbury and other places. We also contribute to their campaigns. All the other campaigns contribute to our campaigns. Thank you everyone.

We are in constant communication with anti-incinerator groups throughout Australia, and often attend workshops and webinars provided by international experts, usually organised by Toxics Free Australia. Thank you TFA.

We can confidently state that NONE of the communities we work with are satisfied by the quantity or quality of community consultations offered by the commercial interests, nor the authorities, involved in those waste-to-energy facilities and proposals.

On the contrary, we all share a sense of dread.

Conclusions

- Somebody is driving this.
Who ?
And why ?
- Never since the trial of Galileo Galilei in 1633 at the hands of the Inquisition, have we seen so much good science dismissed into the dustbin of ignorance, by so many in authority with sufficient education to know better
- “Regulatory Capture” is blatant.
See for example Wendy Y. Lee (2023) at <https://academic.oup.com/ser/article-abstract/21/2/1217/7030814?redirectedFrom=fulltext&login=false>
- “Community consultation” regarding WtE in Victoria is a shambles and a disgrace.
- The deficiencies with community consultation alone are more than sufficient to warrant an investigation of waste-to-energy policy and practice in Victoria, by a Commonwealth Royal Commission. How did we get to this point ?
“Probity” should be a prominent feature of the Royal Commission’s Terms of Reference.
- What’s that awful smell ?

(5) any other related matters

Evidence

Greenwashing

Waste incineration is not, and never has been, a form of recycling, not renewable energy, nor a component of any “circular economy” concept, because incineration destroys the waste resource forever (1,2).

Regrettably, some parliaments and Councils have enshrined these “circular economy” myths into policy and statutes (30, 38, 41, 59, 90, 130). The policies need to be reversed and the laws repealed.

Waste incineration is not a “transition” technology either. We need to go straight to “reduce, re-use and recycle”.

“Transition” is not required (1,2).

See the Senate Inquiry into Greenwashing (94)

Litigation

The warning signs started in Paris, when the French health authority effectively declared eggs from Paris backyard chooks “unfit for human consumption” (7, 8, 61)

So far we have not encountered any “legal consequences” for this declaration.

Not yet.

Currently, the French can get their eggs “POP-free” from further afield.

N.B. The French health authority banned the eggs rather than the incinerator(s) implicated in their contamination. Interesting !

But we know that export food markets can be “sensitive to suggestions” that the produce is somehow “tainted” or “unfit”.

It takes little imagination to forecast the consequences in Lara and further afield of reports (domestic or international) of crops, pastures, orchards, market gardens and livestock being contaminated with;

- Halogenated dioxins and furans
- PAH - polycyclic aromatic hydrocarbons
- BPA - bisphenol A
- PFAS - per- and polyfluorinated alkyl substances
- PCB - polychlorinated biphenyls, and / or
- Heavy metals

... from the local waste incinerator !

Little prompting would be needed for major domestic retailers to stop purchasing, and importing countries to ban our produce. It has happened before.

“SCANDAL” hardly begins to describe it.

Expensive Class Actions are almost guaranteed.

And following extensive and expensive remedial action, when would nations and major local buyers lift the bans and start buying again ?

Just closing the incinerator will not be enough.

No Waste Incinerators in Lara & Greater Geelong Incorporated

Medical consequences

Although the evidence shows that people can suffer dire medical consequences from waste incinerator pollution, and legally they may be entitled to redress, actually proving a case in Court could be well-nigh impossible.

Why ?

Because of the difficulty of proving where the harm actually came from; not to mention the difficulty of finding a responsible “fit and proper person” who is actually a human being, rather than a sheet of paper.

So, “Joe and Jo Public” are sickened by waste incinerator pollution and get to “suffer in silence” (61).

Meanwhile the “medical costs” that should accrue to the polluters are actually paid by citizens and Medicare; another subsidy for waste incineration, this time from the Commonwealth.

We also need to think seriously about “who” will be medically harmed by waste incinerator pollution. Jo and Joe Public are not harmed equally.

Tait et alia (2020) describe the health impacts of waste incineration beginning with;

“A range of adverse health effects were identified, including significant associations with some neoplasia (cancers), congenital anomalies (birth defects), infant deaths and miscarriage.” (114)

Whilst cancer can affect any person at any age (27), only women and their babies suffer directly from miscarriage, infant deaths, and congenital abnormalities (114).

It is also women who suffer personally from failed IVF treatments, related to particulate air pollution (64, 77, 79).

It is eminently arguable that waste incinerator pollution is a “women’s rights issue”.

Malfeasance

It is wrong that any Environment Protection Authority define “tolerable levels” of pollution for toxins which tend to bioaccumulate and biomagnify, especially those which are genotoxic.

An unchanging concentration in the environment of a bioaccumulative pollutant will cause ever increasing contamination of the absorptive species. Including humans and cetaceans (26,132).

Rather than giving “permission to pollute”, with the implication that “we do nothing until the limit is breached”, EPAs everywhere should be approving plans for the elimination of pollutants, ensuring that those plans are implemented effectively.

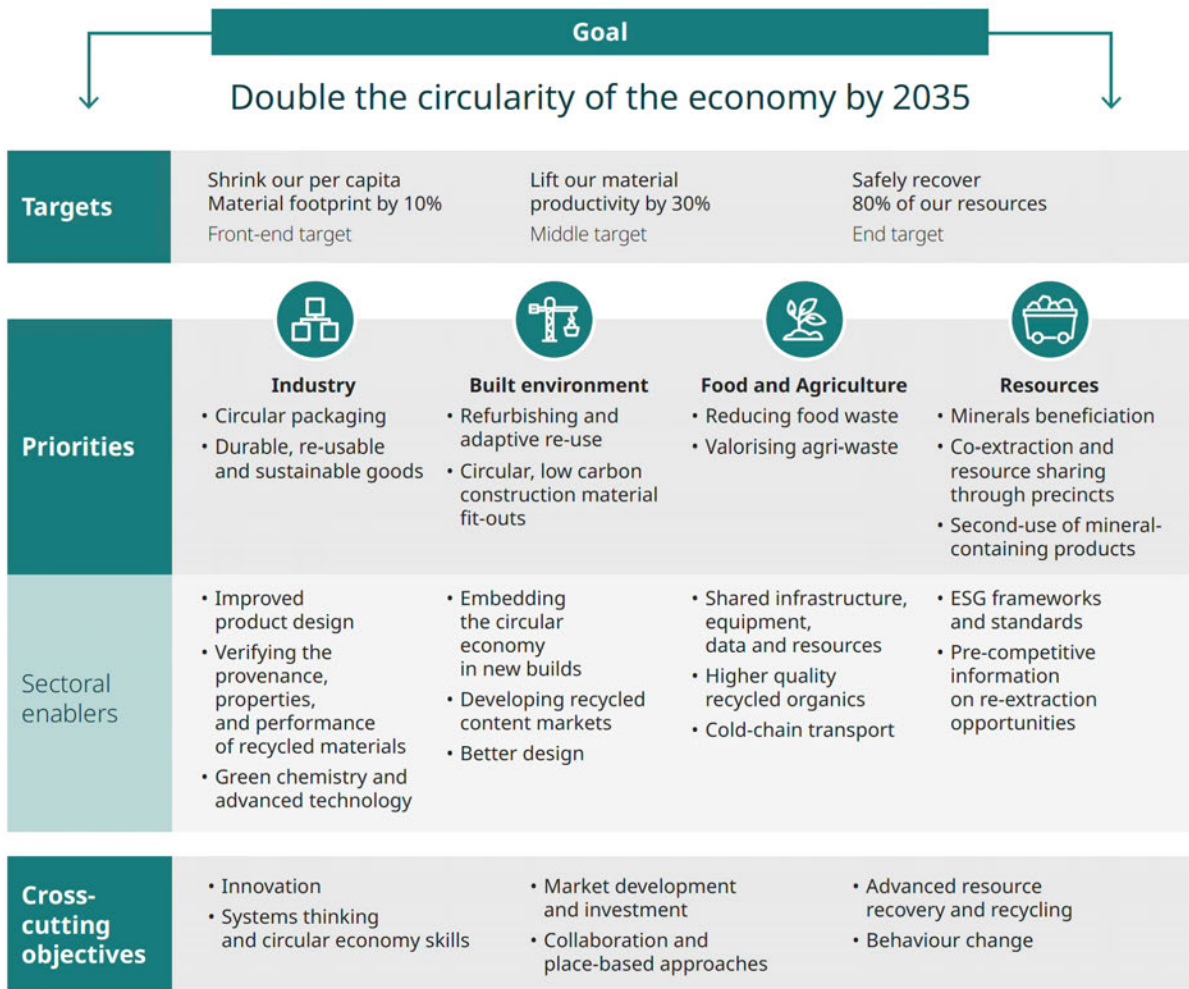
To do otherwise is, we submit, malfeasance.

Commonwealth DCCEEW targets

We note with some satisfaction that the Commonwealth Department of Climate Change, Energy, Environment and Water (Com DCCEEW) has set a target of 80% of all waste to be re-used or recycled by the year 2035 - double the current rate (34, 36)

At 80%, we expect that waste incinerators will receive so little feedstock that they will become unviable.

Framework at a glance



page 6

Both landfill and waste incineration are unacceptable solutions to the waste management challenge.

The Commonwealth Department of Climate Change, Energy, the Environment and Water (Com DCCEEW) has done a great deal of work on plans to manage our waste streams without resorting to incineration, at the same time reducing reliance on landfill. (34, 36)

The Com DCCEEW strategy is to double the rates of re-use and recycling, whilst also reducing consumption (34).

This is the right way to go.

We strongly recommend that the government develops and implements an action plan for waste management, strongly aligned with Com DCCEEW ambitions (34, 36)

Having achieved re-use and recycling rates of 80% in accordance with DCCEEW targets, whilst also reducing consumption, will ensure that there would be almost nothing left to burn.

So be it.

No Waste Incinerators in Lara & Greater Geelong Incorporated

We choose to go to the moon

We accept the argument that “recycling has its limitations”.

However, where we run into those limitations, the correct response we suggest, is to invent new methods of reducing consumption, re-use and recycling.

Such inventions create employment, economic activity and improved quality of life, whilst improving the environment.

Given the existence of CSIRO and a plethora of university departments of engineering, invention itself is limited only by imagination and political will.

The recycling and re-use of some wastes will be hard.

Achieving Com. DCCEEW,s ambition of 80% of waste re-used and recycled by 2035 will be as hard as going to the moon.



“We choose to go to the moon.”

“We choose to go to the moon in this decade and do the other things, not because they are easy, but because they are hard, because that goal will serve to organize and measure the best of our energies and skills, because that challenge is one that we are willing to accept, one we are unwilling to postpone, and one which we intend to win, and the others, too.”

President John F. Kennedy at Rice University 12 September 1962.

See <https://www.rice.edu/jfk-speech>

Recommendations

1. Our primary recommendations are that the incineration / combustion of Municipal Solid Waste (MSW) must be permanently stopped in Victoria and beyond, and all enabling policies and plans permanently halted.
Simultaneously, Victoria must vigorously increase its implementation of Zero Waste Solutions, focussing on
 - Reducing consumption
 - Re-use of materials and energy. and
 - Recycling
2. There needs to be a high-level Commonwealth Royal Commission into the waste-to-energy industry in Australia, with Terms of Reference including;
 - The history of the industry
 - The involvement of serving and former political figures
 - Foreign involvement and investment
 - “Regulatory capture”, and
 - Probity

Alternatively,

If incineration of Municipal Solid Waste (with or without mixed in industrial / commercial waste) is to commence or continue, then it must comply with ALL the strictures stated in our remaining Recommendations.

3. The most important guiding principle in the preparation of new waste management regulations, and project approvals, must be the “Precautionary Principle”;
“The precautionary principle is a strategy used to prevent harm to the public or the environment when scientific knowledge is incomplete. It suggests taking preventive action in the face of uncertainty, rather than waiting for conclusive evidence of harm.”
4. All levels of government to preference
 - reducing consumption, then
 - re-use of wastes”, then
 - recycling of wastes, in that order.
5. Government to place “incineration” (in all its guises) at the very bottom of the waste management hierarchy, with a view to elimination. Waste incineration, in all its forms, should be below landfill in the “waste management hierarchy”.
6. The lead authority in the development of new waste management statutes must be the Commonwealth Department of Climate Change, Energy, the Environment and Water (Com. DCCEEW).
7. Government to recognise that waste incineration (including waste gasification, waste pyrolysis and related technologies) are linear processes, incompatible with any concept of circularity. Waste incineration destroys the waste resource forever and negates a circular economy. Accordingly, all governments at Commonwealth, State and Local levels to repeal all waste management legislation, with a view to replacing these laws which statutes that embody true circularity. The current regulations are so contaminated with false concepts that they are unrepairable.

No Waste Incinerators in Lara & Greater Geelong Incorporated

8. To ensure that we understand the risks associated with waste management projects on residential communities and transport infrastructure we demand a comprehensive and independent Environmental Effects Statement (EES) for every waste management project, including all WtE projects. No exemptions. No exceptions. All waste management projects, including WtE, must be “referred” for an EES without exception. Responsibility for referral must reside with government (e.g. DEECA), not with the proponent. EES laws and regulations to be amended accordingly.
9. Every EES report must be released to the public, with reasonable time for public review and submissions.
10. The energy production potential of a proposed WtE facility must not exempt that facility from assessment against all the other relevant public health and environmental requirements.
11. Government must establish criteria for the automatic and formal rejection of waste management projects which are devoid of social licence. Bullying local government and citizens into accepting or acquiescing to waste management proposals is completely unacceptable.
12. Waste incineration, in all its guises, should not become embedded in the waste management systems of Victoria.
13. There is no need for “caps” on thermal treatment of wastes which do not contribute to global warming or environmental contamination when burned, e.g. biological methane, or bagasse.
14. Government to establish a long-term program of reducing any waste incineration “caps” based on planned and actual improvements in the rates of;
 - prevention of waste
 - re-use of waste, and
 - recycling.
15. If the cap licence system is to continue, the process for the award of each “cap licence” to be made public, including the licence applications, assessment criteria, assumptions and calculations.
16. All Australian jurisdictions to have a co-ordinated waste management system, under the direction of the Commonwealth Department of Climate Change, Energy, the Environment and Water (Com. DCCEEW).
17. Government to recognise that the oft quoted EC 2019 BREF European standards for the operation of waste incinerators are “not fit for purpose” because BREF does not require verification of effectiveness in preventing pollution of landscapes and waterways around the incinerator.
18. Government to cease reliance on all incinerator “standards” which lack verification requirements.
19. Government to stop broadcasting the falsehood that “we are running out of landfill” (sites).
20. Government to stop broadcasting the falsehood that waste incineration is a component of a “circular economy”. WtE negates circularity.
21. Government to stop the broadcasting, by both authorities and commercial interests, of the falsehood that waste incinerators have lower greenhouse gas emissions than landfill. Such claims are not correct in relation to modern landfills which are designed to capture methane emissions.

No Waste Incinerators in Lara & Greater Geelong Incorporated

22. With regard to WtE projects, Councils should also be decision-making authorities. Government to restore the powers of local Councils as decision-making authorities with respect to all waste management facilities. Councils should not be just “referral authorities”. Government to repeal the current Clause 72.01 of the Planning Scheme in all jurisdictions in Victoria.
23. Government to require WtE project proponents to demonstrate with evidence, and government to verify, that every waste management proposal (including WtE) is compliant with the Stockholm Convention, the Basel Convention, and the Minimata Convention. Otherwise reject the proposal.
24. Government to stop the Environment Protection Authority from issuing Development Licences “with conditions”.
The proposal either complies with the EPA requirements, or it is rejected.

N.B. Consider how the practice of EPA issuing “licences with (copious) conditions” forces the EPA into the iniquitous position of being “de facto consultants” to the proponents, whilst also trying to be the regulatory authority. This conflict of interest cannot continue.

N.B. Consider how issuing licences “with conditions” leaves the proponent and the regulator open to actual or perceived corruption, debasing the social licence of both.
25. Government to enforce the requirement in the Waste-to-Energy Framework for each proposal to be accompanied by an independent Business Case. Each BC to be made public. The absence of a published BC should automatically result in “no approval”. The BC to be prepared and published in a manner which would satisfy the standards of the Department of Treasury and Finance.

The publication of a “whole-of-industry” WtE economic study does not satisfy this recommendation. There should be an individual BC for each and every waste management proposal.
26. Government to establish minimum conditions of contract (a “pro-forma contract”) between a waste-to-energy feedstock supplier (e.g. a Council) and the WtE owners and operators. Contracts must not “lock in” feedstock suppliers to long term contracts which discourage enlightened waste management practices such as
 - Reducing consumption
 - Re-using materials and energy
 - RecyclingThis “pro-forma contract” to be made public.

Contracts between government bodies (e.g. Councils) and WtE providers to be made public, and exempted from the customary “commercial-in-confidence” conventions.
27. Government to require that every waste-to-energy project approval to include the deposition of a substantial financial guarantee (a “bond”) with government, to be at least equal to the capital value of the proposed WtE asset. Government to direct that the bond is to be drawn upon in the event of financial failure, technical failure, significant contamination events, and orders from the authorities and Courts for swift contamination cleanups, compensation, and other penalties and restitution. The bond is to be drawn upon for the costs of demolition of the WtE facility and site cleanup, if funding for this is not readily provided from other sources.
28. Government to establish effective systems for the prevention, detection and apprehension of illegal and corrupt conduct regarding waste management. (A waste incinerator can be a very efficient tool for the destruction of evidence !)
29. Where no system currently exists for the re-use and recycling of higher priority waste materials, government to establish, or contribute to research projects aimed at inventing new techniques for managing these wastes.

No Waste Incinerators in Lara & Greater Geelong Incorporated

30. Government to establish and implement a program of bans on the addition of halogenated materials into disposable consumer products e.g. ban the use of PVC (polyvinyl chloride) and PFAS (polyfluorinated alkyl substances) from all consumer packaging, to prevent these materials from ending up in the waste stream and polluting the environment via incinerator emissions and other routes.
31. Government (Commonwealth) to ensure that Medicare records are routinely analysed to detect statistically significant changes in the occurrences of potentially pollution-related medical conditions e.g. “clusters“ of cancers, asthma and miscarriages in areas around waste management facilities. This task to be automated using computer software, with significant findings further reviewed by medical professionals.
32. Governments to take prompt remedial action where such clusters are detected, and ensure that facility closures, demolitions, prosecutions and compensation are enacted.
33. Government to recognise that separation of organic (biological) materials from waste streams, improves the quality and value of all waste streams.
34. Government to increase the number and effectiveness of separations of wastes into purified streams.
35. Government to provide more opportunities, education and incentives for the public to deposit wastes into purified streams, including upgrading the scope and scale of the Container Deposit Scheme (CDS).
36. Government to ensure the maximum possible quantity of organic wastes to be diverted to biological treatments, which do not permit the escape of methane to atmosphere.
37. Government to take more effective actions to prevent the disposal of organic wastes to landfill.
38. Government to establish a program of increasing targets for efficient capture of methane and other greenhouse gasses from landfills, wastewater treatment plants and other waste processing facilities.
39. Government to ensure that the proponent publishes lists of expected species and quantities of emissions from each proposed waste management facility (including all WtE facilities). Government to review and verify.

These lists to be made public, including where applicable;

- greenhouse gasses such as carbon dioxide (CO₂) and nitrous oxide (N₂O)
 - Persistent Organic Pollutants (POPs),
 - PFAS,
 - heavy metals,
 - oxides of nitrogen (NO_x),
 - oxides of sulphur (SO_x),
 - carbon monoxide (CO),
 - hydrogen chloride
 - hydrogen fluoride
 - particulates, as PM₁₀ and PM_{2.5}, and
 - ionizing radiation (i.e. alpha, beta, gamma and neutron), as a minimum.
40. Where any of the estimated quantities or concentrations exceed limits set by regulation, government to ensure that the project does not proceed.

No Waste Incinerators in Lara & Greater Geelong Incorporated

41. Government to stop the Environment Protection Authority (and any other authority) from issuing permits for emissions which tend to bioaccumulate and/or biomagnify up the food chain e.g. halogenated dioxins / furans, polyhalogenated biphenyls, and polyaromatic hydrocarbons and others.
N.B. The notion that there are “tolerable limits” for exposure to these substances is false.
42. Where there are existing permits for the emission of bioaccumulative and/or biomagnifying pollutants, government agencies to require the operators to lodge and implement programs for elimination of these pollutants, with periodic reports on progress.
43. Government to review the scientific literature regarding the proposed incorporation of ash (fly-ash, bottom ash or “IBA”, and any other ash) into products (e.g. road making materials and concrete), and the risks to environment and public health associated with this practice when those products are disposed of at end-of-life. Report with recommendations to be made public.
44. Government to prohibit the addition of incinerator wastes (e.g. fly-ash and bottom ash) into food or stockfeed, or any ingredients which could be added to food or stockfeed.
45. In addition to process controls with recording, government to require that the WtE facility operator cause the taking of regular “environmental samples” of air, soil, water and biota in the area around the facility (at least five kilometre radius): those samples to be tested for Persistent Organic Pollutants, heavy metals, PFAS, noxious gasses and other pollutants. Sampling and testing to be done by independent testing authorities, in conformance with ISO 17025. Frequency of sampling to be at least quarterly, beginning with “baseline sampling” before the facility commences operations. Government to ensure that the data are analysed for trends. Summary reports to be made public.
46. Government to require each waste management facility operator to report at least quarterly on actual emissions of greenhouse gasses from the facility. These reports to be made public.
47. Government to ensure that there are quarterly reports on the amounts of electrical energy (and any other forms of energy) exported off the WtE facility site.
48. The productivity of waste to energy facilities (watts per tonne of feedstock) to be published quarterly.
49. The actual costs of producing energy from waste (\$ per megawatt hour) to be published quarterly.
50. Government to review the productivity and cost/benefits associated with making energy from waste, and compare these with other forms of energy production. Reports to be published quarterly.
51. Com. DCCEEW and CSIRO in partnership to continually develop new techniques for
 - Reducing consumption
 - Re-using materials” and
 - RecyclingCom. DCCEEW to ensure that new waste management developments are published, advising all State governments regarding progress.
52. Primarily due to public health and environmental concerns, WtE incineration (in all its forms) must be placed at the very bottom of the Waste Management Hierarchy; that is, below landfill.

No Waste Incinerators in Lara & Greater Geelong Incorporated

53. Government to replace the recommendations in the Environment and Planning Committee's 2020 Inquiry report with the recommendations from this 2026 WtE Inquiry. As a minimum, consent to recommendations 34, 37, 39 and 40 in the Environment and Planning Committee's 2020 Inquiry report must be annulled.
54. Government to recognise that "community consultation" regarding WtE has been a charade and a disgrace, resulting in profound mistrust.

The "greenwashing" of WtE is blatant, as is the "regulatory capture" of the responsible authorities. Greenwashing and "regulatory capture" are fuelling the widely held community opinion that WtE is steeped in corruption.

Government to recognise that "Community consultation" has been a scandal.
55. Government to take responsibility for ensuring the community is provided with correct, timely and scientifically defensible information regarding WtE.
56. Government to take responsibility for WtE "mythbusting": that is, replacing false claims and missing information with facts.
57. Government to take responsibility for ensuring that requests for WtE information under "Freedom of Information", "Parliamentary Orders for the Production of Documents" and letters to Ministers are actually answered, and in reasonable time.
58. The high level of community suspicion regarding WtE certainly justifies a Commonwealth Royal Commission into the probity of the entire WtE industry in Australia. Significant feeders of this suspicion include;
 - the absence of WtE Environmental Effects Statements in Victoria,
 - the absence of WtE Business Cases,
 - non-answers from proponents and authorities regarding legitimate questions, with some questions actually ruled "inadmissible".
 - false claims such as "we are running out of landfill", and "WtE is part of a circular economy", and "WtE is harmless",
 - obvious "Regulatory Capture",
 - reports in the reputable press of senior Australian political figures promoting WtE, with the possibility of commercial involvement.

No Waste Incinerators in Lara & Greater Geelong Incorporated

-
- 59. Government to deeply consider the legalities of WtE, including the following potential liabilities;
 - Food products, including export food products, having been contaminated by emissions from waste-to-energy facilities, being declared “unfit for human consumption” and banned by any jurisdiction. The producers and merchants of that food then having recourse at law against waste incinerator operators and government, potentially under “class action”.
 - Citizens, in any jurisdiction, claiming damages for medical harms (e.g. cancer, miscarriage, birth defects, infant deaths, respiratory illness and others) allegedly attributable to WtE emissions.
 - WtE facility operators and owners “knowingly, and recklessly” contaminating communities, food and the environment with carcinogens, mutagens and teratogens, endocrine disrupters and heavy metals via WtE emissions. Could such behaviour be considered “crimes against humanity” ?
 - By permitting WtE and its emissions, is Australia breaching its obligations under the Stockholm Convention on Persistent Organic Pollutants, and other International Conventions ?
 - Failure to list WtE facilities on real estate “Section 32 Vendor Statements”, as applicable to properties in the vicinity of WtE facilities.
 - The Commonwealth to stop WtE projects supported by inappropriate foreign investments using “Australia’s Foreign Relations (State and Territory Arrangements) Act 2020”, and similar.

Government to prosecute those who have broken the law, and also tighten up laws which have allowed practices contrary to the public interest to flourish.

- 60. Finally, we want to know “What’s that awful smell ?”

Conclusions

The harms of waste incineration are numerous, serious and well documented.

And ignored.

We find a strange reluctance by the authorities to take this intelligence into consideration.

The scientific evidence provides no justification for having an industry in Victoria which relies on the combustion of wastes such as Municipal Solid Waste.

Government must stop it. Without delay.

That waste incineration has come to the point of project approvals (e.g. Lara) tells us that something has gone very wrong with our regulatory and political processes: indeed, so wrong that it certainly warrants a Commonwealth Royal Commission which prominently includes “probity” in its Terms of Reference.

What’s that awful smell ?

Please keep us advised regarding the progress of this Parliamentary Inquiry.

We will be pleased to provide further assistance to the Inquiry, as required.

Address for correspondence;

Charles (Chaz) Street

[REDACTED]

Secretary and Science Advisor

No Waste Incinerators in Lara & Greater Geelong Incorporated

[REDACTED]

[REDACTED]

[REDACTED]

www: <https://nowasteincinerators.org/>

FB: <https://www.facebook.com/groups/saynolarabigincinerator>

No Waste Incinerators in Lara & Greater Geelong Incorporated

Terminology

Baseline	= a system of assessment in which the first measurements are taken before the project has commenced.
Bisinella	= Bisinella Developments Pty. Ltd.
CoGG	= City of Greater Geelong
DCCEEW	= Commonwealth Department of Climate Change, Energy, the Environment and Water
DEECA	= Department of Energy, Environment and Climate Action - Victoria
EfW	= Energy from Waste = WtE
EPA	= Environment Protection Authority Victoria
MWC	= Municipal Waste Combustor = incinerator
NWIL&GG Inc.	= No Waste Incinerators in Lara & Greater Geelong Incorporated.
PHI	= Prospect Hill International Pty. Ltd.
VCAT	= Victorian Civil and Administrative Tribunal
WRRF	= Waste and Resource Recovery Facility = "Transfer station"
WtE	= Waste to Energy = EfW
WTS	= Waste Transfer Station = WRRF

Bibliography

1. Abbas A., Bui Viet D. & Sanjaya E. (2025) in *The Conversation* “Waste-to-energy in Australia: how it works, where new incinerators could go, and how they stack up” published 16 May 2025.
Available at https://theconversation.com/waste-to-energy-in-australia-how-it-works-where-new-incinerators-could-go-and-how-they-stack-up-254395?fbclid=IwY2xjawKTzTpleHRuA2FibQIxMABicmlkETFESIZqZm5oNmRsNFVwUjUyAR41oNPWjtZyt_XKpPPDwOXBCYbZPpGHBnUtZqfsuJtOm_CnNEWcUPukf5GKZQ_aem_Cskcq72cYEKXNebs2wd2Mg
2. Abbas, Ai, Bui Viet D and Sanjaya E. (2025) “Can waste-to-energy incinerators in Australia provide some answers to our recycling crisis ?” The University of Sydney.
Available at <https://www.sydney.edu.au/news-opinion/news/2025/05/16/how-waste-to-energy-incinerators-work-in-australia.html>
3. ABC (2024) “Five waste-to-energy plants are under development in Victoria. Here's how it works” by Harrison Tippet and Natasha Schapova. ABC News
Available at <https://www.abc.net.au/news/2024-08-21/waste-to-energy-victoria/104248440>
4. ABC (2025) “Victorian government unveils 25 more areas where it wants to add high-rise living” by Andi Yu and Madi Chwastra.
Available at https://www.abc.net.au/news/2025-02-27/melbourne-activity-centres-25-new-locations/104991310?fbclid=IwY2xjawJava5leHRuA2FibQIxMAABHe_6Y1xVrilawNL5xBPpxqt3GV4xu36PBnf2BdwXODh9jNK7r3xUS3e2ng_aem_ac13p_qq-4sywaHx_K4JqA
5. ABC (2025) “Australia is set to embrace energy from waste, but should it ?” Norman Hermant. Australian Broadcasting Corporation 15 June 2025.
See <https://www.abc.net.au/news/2025-06-15/australia-energy-from-waste-plants-landfill-sustainable/105395550>
6. ABC 7:30 Report (2025) “Is generating electricity by burning rubbish a good idea ?” Norman Hermant reporting, with Sarah Ferguson. Australian Broadcasting Corporation 11 June 2025.
See <https://www.abc.net.au/news/2025-06-11/is-generating-electricity-by-burning-rubbish-a/105405872>
7. Agence Régionale di Santé Île-de-France (2023) “Contamination des œufs de poules par des polluants organiques persistants. Étude dans 25 poulaillers domestiques en Île-de-France.”
Available at https://www.iledefrance.ars.sante.fr/system/files/2023-11/RAPPORT%20-%20Contamination%20des%20oeufs%20de%20poules%20par%20des%20polluants%20organiques%20persistants%20-%20Novembre%202023_0.pdf
8. Agir pour la santé en Île-de-France (2023) “Polluants organiques persistants : l’Agence recommande à titre conservatoire de ne pas consommer les œufs des poulaillers domestique. Communiqué de presse.
Available at <https://www.iledefrance.ars.sante.fr/polluants-organiques-persistants-lagence-recommande-titre-conservatoire-de-ne-pas-consommer-les>
English translation available on request.
9. Allsopp, M., Costner, P. & Johnston, P. (2001) “Incineration and human health.” *Environ Sci & Pollut Res* **8**, 141–145.
Available at <https://doi.org/10.1007/BF02987308>
10. Arkenbout, A, (2020). “Hidden temperatures: emissions implications of temperatures in the post-combustion zone of waste incinerators,” *Zero Waste Europe*.
Available at https://toxicowatch.org/wp-content/uploads/2025/08/zero_waste_europe_case-study_hidden-temperatures-in-waste-incinerators_en.pdf
11. Arkenbout A, & Bouman KJAM, (2021) “Biomonitoring research Paris Ivry-sur-Seine, 2021” *ToxicoWatch*. Publication number 2021-P04.

No Waste Incinerators in Lara & Greater Geelong Incorporated

Available at <https://toxicowatch.org/wp-content/uploads/2025/08/Report Paris DEF AA21 KB18-1.pdf>

12. Arkenbout A, & Bouman KJAM, (2022) “Biomonitoring research dioxins (PCDD/F/dl-PCB), PFAS and PAH in relation to waste incineration in Kaunas, Pilsen, and Madrid.” *ToxicoWatch* Publication number: 2022-BIOM-3Cc
Available at https://toxicowatch.org/wp-content/uploads/2025/08/2022_Def-report_ZW3C_5_revised-4.pdf
13. Arkenbout A., Bouman KJAM. (2023). Hidden emissions waste incinerator IVRY-PARIS XIII AMESA semi-continuous measurements 2020 – 2021” *Toxicowatch* Publication Number: 2023-04-P03.1
Available at <https://toxicowatch.org/wp-content/uploads/2025/08/Paris IPXIII Amesa TW2023-1.pdf>
14. Arkenbout A., Bouman KJAM. (2023) “Biomonitoring research dioxins eggs backyard chicken Beringen, Belgium 2022” *Toxicowatch* Publication number: 2023-BE-03
Available at https://toxicowatch.org/wp-content/uploads/2025/08/2023_BE_report_EN_22-1.pdf
15. Arkenbout A., Bouman KJAM. (2024) “Biomonitoring research persistent on organic pollutants in the environment surrounding the cement plant in Turna nad Bodvou, Slovakia 2023”. *Toxicowatch* Publication number: 2024-SK02-Vs-07
Available at https://toxicowatch.org/wp-content/uploads/2025/09/2024_SK_May-TW-Report-7vs-.pdf
16. Arkenbout A., Bouman KJAM. (2024). “Biomonitoring research on persistent organic pollutants in the environment of the Waste Incinerator REC, Harlingen, The Netherlands.” *Toxicowatch* Publication number: 2024-NL-1
Available at <https://toxicowatch.org/wp-content/uploads/2025/08/TW-TTT2-Biomonitoring-Netherlands-2024-EN.pdf>
17. Arkenbout A., Bouman K., & Esbensen K.H. (2025) “Introduction of Innovative Sampling media for biomonitoring of environmental Loads of Persistent Organic Pollutants (POPs)” *Toxicowatch* DOI: 10.62178/sst.003.002.
Available at https://www.sst-magazine.info/wp-content/uploads/2025/04/sst-003-002.pdf?fbclid=IwY2xjawJoel5leHRuA2FibQlxMAABHsb2GAFjZ9OOggeBLUaIO43gB1nfnDg_tR2AETVooFLI_Rnp8AGcPutGDYt_aem_A5ug0liCBsO0boHR2AYzoA
18. Arkenbout A., and Bouman K. (2025) “PFAS, Dioxins and PAH in Primary School Air Filters Ivry-sur-Seine (suburb of Paris, France), 2024 - 2025”. *ToxicoWatch*. Zero Waste Europe. Publication number 2025-TWS-PA-SF-01_vs-01
Available at https://zerowasteurope.eu/wp-content/uploads/2025/09/2025_ToxicoWatch_Paris_PA_REP_S-Filters_AA26-KB26-JV2_K3.pdf
19. Australian Government (2020) “Australia’s Foreign Relations (State and Territory Arrangements) Act 2020” Federal Register of Legislation
Available at <https://www.legislation.gov.au/C2020A00116/asmade/text>
20. Australian Government (2025) “National Environmental Protection Agency Act 2025” Federal Register of Legislation
Available at <https://www.legislation.gov.au/C2025A00069/asmade/text>
21. Barnard, M. (2025) “Plasma Gasification Promises the World, Fails Everywhere—Pune Was No Exception” in *CleanTechnica*, 01 March 2025.
Available at https://cleantechnica.com/2025/03/01/plasma-gasification-promises-the-world-fails-everywhere-pune-was-no-exception/#google_vignette
22. Bell L. & Takada H. (2021) “Plastic waste management hazards: waste to energy, chemical recycling and plastic fuels” International Pollution Elimination Network (IPEN) International Pellet Watch.

No Waste Incinerators in Lara & Greater Geelong Incorporated

Available at <https://ipen.org/sites/default/files/documents/ipen-plastic-waste-management-hazards-en.pdf>

23. Bisinella R. (2024) "No incinerator Lara - RB's explanation" (video) produced by The Tribe Video Production.
See <https://www.youtube.com/watch?v=k2G6-ZO7d9A&t=6s>
24. Bjorklund, Weidemann & Jansson (2024) "Distribution of Per- and Polyfluoroalkyl Substances (PFASs) in a Waste-to-Energy Plant – Tracking PFASs in Internal Residual Streams." *Environmental Science and Technology* Vol 58/Issue 19, 30 April 2024.
Available at <https://pubs.acs.org/doi/10.1021/acs.est.3c10221>
25. Bottini I., Vecchi S., De Sario M., Bauleo L., Trentalange A., Michelozzi P., Ancona C., (2025) "Residual exposure to municipal solid waste incinerators and health effects : a systematic review with meta-analysis" *BMC Public Health* 25, 1989 (2025).
Available at <https://rdcu.be/e1OEC>
26. Brunn H. et alia (2023) "PFAS: forever chemicals – persistent, bioaccumulative and mobile. Reviewing the status and the need to their phase out and remediation of contaminated sites" in *Environmental Sciences Europe* 2023, 35(1):20
<https://doi.org/10.1186/s12302-023-00721-8>.
Available at: <https://enveurope.springeropen.com/counter/pdf/10.1186/s12302-023-00721-8.pdf>
27. Cancer Australia (2023) "Australian Cancer Plan", particularly "Strategic Objective 1 Maximising Cancer Prevention and Early Detection".
Summary report available at
https://www.canceraustralia.gov.au/sites/default/files/publications/pdf/2023_ACP%20Summary%20Report%20DIGITAL_V9.pdf
28. CoGG (2025) "Advocacy against the Lara Incinerator continues." City of Greater Geelong
Available at
<https://www.geelongaustralia.com.au/planning/news/item/8dd405035393300.aspx>
29. CoGG (2025) Minutes of the Council meeting of 22 April 2025. Question and response from Submitter 3, Charles Chaz Street. See page 9 of 710. City of Greater Geelong
Available at
<https://www.geelongaustralia.com.au/common/Public/Documents/8dd8353c1dca3d4-councilmeetingminutes-22april2025.pdf>
30. CoGG (2025) Minutes of the Council meeting of 09 December 2025. See the report at section 2.8 "Energy from Waste: Navigating Future Waste Operations and Circular Economy Opportunities", pages 49 to 53. City of Greater Geelong.
Available at
<https://www.geelongaustralia.com.au/common/Public/Documents/8de34113de55de7-councilmeetingminutes-9december2025.pdf>
31. CoGG (2026) City of Greater Geelong Planning Scheme Clause 72.01
Available at <https://planning-schemes.app.planning.vic.gov.au/Greater%20Geelong/ordinance/72.01>
32. Commoner B., Bartlett P.W., Eisl H., Couchot K., (2000) "Long-range Air Transport of Dioxin from North American Sources to Ecologically Vulnerable Receptors in Nunavut, Arctic Canada: Final Report to the North American Commission for Environmental Cooperation" Centre for the Biology of Natural Systems (CBNS) Queens College, CUNY.
Available at <https://www.cec.org/files/documents/publications/2196-long-range-air-transport-dioxin-from-north-american-sources-ecologically-vulnerable-en.pdf>
33. DCCEEW (2023) "Stockholm Convention on Persistent Organic Pollutants (POPs)"
Available at <https://www.dcceew.gov.au/environment/protection/chemicals-management/international-agreements/stockholm-convention>

No Waste Incinerators in Lara & Greater Geelong Incorporated

34. DCCEEW (2024) "Australia's Circular Economy Framework" Commonwealth Department of Climate Change, Energy, the Environment and Water.
Available at https://www.dcceew.gov.au/environment/protection/circular-economy/framework?fbclid=IwZXh0bgNhZW0CMTAAR1MT0V9EWrtTBVqiWqnTxq9H5MDrPT2z-xUJgXF6hKAs7ggU_w_RapO2Z8_aem_iSqnpBR8tnURLq_RKXfhg
35. DCCEEW (2025) "Net Zero" Commonwealth Department of Climate Change, Energy, the Environment and Water.
Available at <https://www.dcceew.gov.au/climate-change/emissions-reduction/net-zero>
36. DCCEEW (2025) "No time to waste" Report of the waste reduction and recycling policy committee. Commonwealth Department of Climate Change, Energy, the Environment and Water.
Available at https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Wastereduction/Report
37. DEA (2021) "Submission to the Inquiry into the Health Impacts of Air Pollution in Victoria - April 2021. Doctors for the Environment Australia."
Available at https://www.parliament.vic.gov.au/495f7a/contentassets/3586a4999e254ab7b01cf5004caf67b7/submission-documents/068_2021.04.22---doctors-for-the-environment-australia_redacted.pdf
38. DEECA (2021) "Waste to Energy Framework". Department of Energy, Environment & Climate Action.
Available at <https://www.vic.gov.au/waste-energy>
39. DEECA (2025) "Climate Action Targets". Department of Energy, Environment & Climate Action.
Available at <https://www.climatechange.vic.gov.au/climate-action-targets>
40. Di Ciaula et alia (2020) "Biomonitoring of Metals in Children Living in an Urban Area and Close to Waste Incinerators" International Journal of Environmental Research and Public Health, Volume 17, 16 March 2020.
Available at http://ipen.org/sites/default/files/documents/italian_metals_study.pdf
41. DT&F (2024) "Economic Growth Statement". Department of Treasury and Finance.
Available at <https://www.vic.gov.au/economic-growth-statement>
42. DT&P (2023) "Ministerial Guidelines for the Assessment of Environmental Effects" 8th Edition 2023. Department of Transport and Planning Victoria.
Available at <https://www.planning.vic.gov.au/environmental-assessments/environmental-assessment-guides/ministerial-guidelines-for-assessment-of-environmental-effects>
43. Dunn, Morgan (2022) "Meet Trofim Lysenko, The Russian Agronomist Whose Pseudoscience Doomed Millions." All That's Interesting – Trofim Lysenko.
Available at <https://allthatsinteresting.com/trofim-lysenko>
44. Earthsure (2024) "Earthsure – Veolia and Ventia Joint Venture."
Available at <https://www.ventia.com/campaign/earthsure-veolia-and-ventia-joint-venture>
45. Earthsure (2025) "Victoria's trusted one-stop solution for sustainable soil remediation" Published by Ventia and Veolia.
Available at https://www.anz.veolia.com/sites/g/files/dvc2011/files/document/2025/09/2114_Veolia_Earthsure%20Brochure%20Update_WEB_09-25%20%281%29.pdf
46. EC (2020) COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS "A new Circular Economy Action Plan For a cleaner and more competitive Europe."

No Waste Incinerators in Lara & Greater Geelong Incorporated

Available at https://eur-lex.europa.eu/resource.html?uri=cellar:9903b325-6388-11ea-b735-01aa75ed71a1.0017.02/DOC_1&format=PDF

47. EC BREF (2019) "COMMISSION IMPLEMENTING DECISION (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration (notified under document C(2019) 7987)"
Available at <https://eippcb.jrc.ec.europa.eu/index.php/reference/waste-incineration-0>
48. EJN (2024) "Trash incineration more polluting than coal" Energy Justice Network. 1432 Elbridge Street, Philadelphia, PA 19149, USA.
Available at <https://energyjustice.net/incineration/worsethancoal/>
49. EJN (2024) Fact sheet: "Trash incinerator closures 2000-2024". Energy Justice Network.
Available at <https://www.energyjustice.net/incineration/closures.pdf>
50. EJN (2025) "Burn, Baby, Burn ?" Mike Ewall at Energy Justice Network, Philadelphia, USA.
See <https://www.youtube.com/watch?v=4Y04GK8VPgA>
51. EPA (2019) Publication 1734: PFAS in Victorian waterfowl: Investigation of the presence of PFAS in 19 wetlands in Victoria.
Available at <https://www.epa.vic.gov.au/about-epa/publications/1734>
52. EPA (2021) Capire report on the s236 "Conference of Interested Persons, Prospect Hill Waste to Energy Facility Proposal" Conference 13 July 2021 at Masonic Hall, Rennie Street, Lara. Report prepared for EPA Victoria, published by Capire, 27 July 2021.
Available from EPA Victoria on request.
53. EPA (2023) "PFAS contamination at Department of Defence sites".
Available at <https://www.epa.vic.gov.au/for-community/current-projects-issues/pfas-contamination-at-department-of-defence-sites>
54. EPA (2023) "Development licence and Development licence assessment report DL000300041" issued by the EPA dated 6 December 2023.
Available at <https://engage.vic.gov.au/prospect-hill-international-pty-ltd-lara>
55. EPA (2025) "Approval to use incinerator bottom ash" Environment Protection Authority Victoria.
Available at <https://www.epa.vic.gov.au/approval-use-incinerator-bottom-ash>
56. EPA (2025) "Per- and polyfluoroalkyl substances (PFAS) Learn about PFAS and EPA advice for managing exposure to PFAS." Environment Protection Authority Victoria. Available at <https://www.epa.vic.gov.au/and-polyfluoroalkyl-substances-pfas>
57. EPA (2026) "Polychlorinated biphenyls (PCBs) There are requirements for managing waste contaminated by polychlorinated biphenyls (PCBs)". Environment Protection Authority Victoria.
Available at <https://www.epa.vic.gov.au/polychlorinated-biphenyls-pcbs>
58. EPA Engage Victoria (2021) "Lara Energy from Waste" licence application".
Available at <https://engage.vic.gov.au/prospect-hill-international-pty-ltd-lara>
59. EPA Engage Victoria (2025) "Striking the right balance for waste to energy in Victoria".
Available at https://engage.vic.gov.au/wastetoenergy?fbclid=IwY2xjawJavAdeHRuA2FibQIxMQABHRMuAxHPELN0MRD7J75Zdc6eqMTKesY81JCIH9TP3uxrhRC8LGoLPzwxMQ_aem_oj6ZM8RSIXb7IBheQZxBng
60. Eskenazi B. et alia (2018) "The Seveso accident: A look at 40 years of health research and beyond." *Environment International* Vol 121, Part 1, pp71-84.
Available at: <https://www.sciencedirect.com/science/article/pii/S0160412018313928>.
61. Euronews (2023) "Millions in France warned not to eat eggs from backyard chickens due to forever chemical pollution."

No Waste Incinerators in Lara & Greater Geelong Incorporated

Available at <https://www.euronews.com/green/2023/11/21/millions-in-france-warned-not-to-eat-eggs-from-backyard-chickens-due-to-forever-chemical-p>

62. Eunomia (2022) "Greenhouse Gas and Air Quality Impacts of Incineration and Landfill: Report to National Toxic Network" by Ann Ballinger, William Shanks, Tamsin Miles, Sophie Degagny.
Available at [https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/04/Greenhouse Gas Air Quality Impacts Incineration Landfill v2.2-1.pdf](https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/04/Greenhouse_Gas_Air_Quality_Impacts_Incineration_Landfill_v2.2-1.pdf)
63. Ewall, M. (2025) "Fact Sheet: Trash incinerator closures 2000 - 2024." Published by Energy Justice Network.
Available at <https://www.energyjustice.net/incineration/closures.pdf>
64. Fiseyo-Bambi, Jerry (2025) "Today, around 3 million people, including many children, still suffer serious health issues associated with exposure to Agent Orange." in *Euronews* 28 April 2025.
See video within https://www.euronews.com/2025/04/28/50-years-after-vietnam-war-millions-still-battle-chemical-weapons-impact?fbclid=IwY2xjawL298hleHRuA2FibQIxMABicmlkETFWTzhEdW5VVEhjMHZlbnpmAR7OS94M-BNYrX3zrgyL2cixnA0M66cojuyCm3QcKheOBrQ0GMmOLWvbFNpv8Q_aem_g190t0-K5CSMPSk6K0tIkA
65. GAIA (2013) "Waste Incinerators: Bad News for Recycling and Waste Reduction"
Available at <https://www.no-burn.org/wp-content/uploads/Bad-News-for-Recycling-Final.pdf>
66. GAIA (2016) "Questions to ask when evaluating a "waste-to-energy" incineration project or proposal" January 2016
Available at [https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/04/GAIA-Questions To Ask When Evaluating A WtE Project or Proposal.pdf](https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/04/GAIA-Questions_To_Ask_When_Evaluating_A_WtE_Project_or_Proposal.pdf)
67. Health Direct (2024) "Asthma." Health Direct. Australian Government. Department of Health, Disability and Ageing.
Available at <https://www.healthdirect.gov.au/asthma#causes>
68. Harlow, Elizabeth (2026) "How Detroiters Finally Won the 30 Year Fight to Shut Down Enormous Trash Incinerator." Ecology Center.
Available at https://www.ecocenter.org/how-detroiters-finally-won-30-year-fight-shut-down-enormous-trash-incinerator?fbclid=IwY2xjawPEUopleHRuA2FibQIxMABicmlkETFVWVZZjFPUm9jd3ZOSVdhc3J0YwZhcHBfaWQQMjlyMDM5MTc4ODlwMDg5MgABHImFJMDS56D-CUKTdIqYreLsl3dQ1NqwZ2wvJl-5jVeM2OwUMFSYJGQaAC_u_aem_KUHJdFC_QMo8AuCkCBf1Uw
69. IPEN (2005) "After incineration: the toxic ash problem" International Pollution Elimination Network (IPEN). Contributors Jindrich Petrlik MSc - Arnika Association, and Ralph Anthony Ryder - Communities Against Toxics.
Available at https://ipen.org/sites/default/files/documents/After_incineration_the_toxic_ash_problem_2015.pdf
70. IPEN (2020) "Toxic ash poisons our food chain" by Jindrich Petrlik and Lee Bell, IPEN. UPDATED: February 2020. Arnika, National Toxics Network, International Pollution Elimination Network (Publishers)
Available at https://ipen.org/sites/default/files/documents/ipen-toxic-fly-ash-in-food-v2_3-en.pdf
71. IPEN (2023) "CHEMICAL RECYCLING: A DANGEROUS DECEPTION: Why chemical recycling won't solve the plastic pollution problem". Author Lee Bell, with contributions from Jenny Gitlitz and Jennifer Congdon (Beyond Plastics), and Andrew N. Rollinson, Ph.D.. Published by IPEN and Beyond Plastics at Bennington College.

No Waste Incinerators in Lara & Greater Geelong Incorporated

Available at <https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2025/07/10-30-23-Chemical-Recycling-Report-web.pdf>

72. IPEN (2025) Waste Incinerator Ash Poisons the Food Chain: A Brief for Delegates: Keep the Promise. Eliminate POPs !” Authors: Lee Bell and Jindřich Petrlík. International Pollution Elimination Network (Publishers).
Available at <https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2025/07/ipen-fly-ash-delegate-brief-v1-1-en.pdf>
73. Jelinek et alia (2022) Dioxins – “The old dirty (dozen) guys are still with us – II”. Conference: Stockholm Convention on POPs, Tenth Conference of Parties, 06 - 17 June, 2022 at Geneva
Available at https://www.researchgate.net/publication/361094192_Dioxins_-_The_old_dirty_dozen_guys_are_still_with_us_-_II
74. Jelínek Nikola, Petrlík Jindřich, Bremmer Jane, Kuepouo Gilbert, Ochieng Griffins, Ožanová Sarah, Bell Lee (2024) “Waste incineration and the environment”, Toxics Free Australia.
Available at https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/09/Jelinek_2024_Waste-Incineration.pdf
75. Jovan S. et alia (2024) “Putting biomonitors to work: native moss as a screening tool for solid waste incineration.” *Environmental Monitoring and Assessment* Vol **196**, 1177 (2024).
Available at <https://doi.org/10.1007/s10661-024-13354-y>
76. Kokkinari A., Antoniou E., Gouronti K, Dagla M., Lykeridou A, Zervoudis S., Tomara E., Iatrakis G. “Human Breast Milk as a Biological Matrix for Assessing Maternal and Environmental Exposure to Dioxins and Dioxin-like Polychlorinated Biphenyls: A Narrative Review of Determinants.” *Pollutants* 2025, 5(3), 25;
<https://doi.org/10.3390/pollutants5030025>
Available at <https://www.mdpi.com/2673-4672/5/3/25>
77. Leathersich S.J, et alia, (2024) “Particulate matter (PM2.5 and PM10) exposure prior to oocyte collection is associated with decreased live birth rates in subsequent frozen embryo transfers.” *Human Reproduction* (2024). *Human Reproduction*, 2025 **40(1)**, 110–118 <https://doi.org/10.1093/humrep/deae259>
Available at <https://medicalxpress.com/news/2024-07-air-pollution-linked-decrease-ivf.html>
78. Lemoine D., Langer A., Bo Guo, (2025) “PFAS in pregnant women’s drinking water puts their babies at higher risk, study finds” *The Conversation*, 9 December 2025.
Available at <https://theconversation.com/pfas-in-pregnant-womens-drinking-water-puts-their-babies-at-higher-risk-study-finds-270051>
79. Fei Li, Xiaoyan Duan, Mingming Li, Yumei Gao, Yuejuan Kang, WenJun Zheng, XueYan Guo & Ying Chen (2025) “Environmental pollution and human fertility: investigating the relationship between PM2.5 exposure and assisted reproductive technology outcomes”. *BMC Public Health* 25, 1357 (2025).
Available at <https://link.springer.com/article/10.1186/s12889-025-22518-5>
80. Li S. et alia (2025) “Associations between per-and polyfluoroalkyl substances (PFAS) and county-level cancer incidence between 2016 and 2021 and incident cancer burden attributable to PFAS in drinking water in the United States.” *Journal of Exposure Science and Environmental Epidemiology*, 9 January 2025.
Available at <https://rdcu.be/d7S8l>
81. Lott P., Maurer F., Beck A., (2025) “Roadmap to Catalytic Abatement of Gas Phase Per- and Polyfluoroalkyl Substances (PFAS)” Minireview in *Angewandte Chemie International Edition* published by Wiley-VCH GmbH.
Available at <https://onlinelibrary.wiley.com/doi/epdf/10.1002/anie.202424718>
82. Luo, Ganfeng et alia (2025) “Estimated worldwide variation and trends in incidence of lung cancer by histological subtype in 2022 and over time: a population-based study.” *The Lancet Respiratory Medicine*, Volume 0, Issue 0
Available at [https://www.thelancet.com/journals/lanres/article/PIIS2213-2600\(24\)00428-4/abstract](https://www.thelancet.com/journals/lanres/article/PIIS2213-2600(24)00428-4/abstract)

No Waste Incinerators in Lara & Greater Geelong Incorporated

83. Manila Times (2025) "Top 10 Global Waste-to-energy Equipment Brands of 2025 Revealed" published 15 August 2025.
Available at https://www.manilatimes.net/2025/08/15/tmt-newswire/pr-newswire/top-10-global-waste-to-energy-equipment-brands-of-2025-revealed/2168496?fbclid=IwY2xjawMWk71leHRuA2FibQIxMABicmlkETFBNzJuVGIUNnIkMG9PWGJKAR4amYJVdINRrhNAa47WY2dPgKHWrwX8KCLDgOf-HxdaFLgoB9tl1_3MxjWXaw_aem_BEnu6DfoELSnrT7x0_yWzw
84. Maxey, Ahmina (2025) "What's wrong with burning trash anyway ? So very very much." Conservation Law Foundation, Boston Massachusetts USA.
Available at <https://www.clf.org/blog/whats-wrong-with-burning-our-trash-anyway/>
85. Ming-Yang Liu, Ai-Min Songa, Hui-Ru Li, Sheng-Tao Ma, Ren-Jie Shang, Yao Xiao, Ping-An Peng, Jian-Fang Hu (2025) "Generation characteristics of polybrominated and polychlorinated dibenzo-p-dioxins/furans (PBDD/Fs and PCDD/Fs) under varying incineration conditions of municipal solid waste" Environmental Pollution Volume 371, 15 April 2025.
Available from Elsevier at <https://www.sciencedirect.com/science/article/pii/S0269749125003197>
86. Mowbray S. (2025) "'Alarming' levels of toxins found in free-range eggs near dumpsites globally" Mongabay (Publisher)
Available at https://news.mongabay.com/2025/10/alarming-levels-of-toxins-found-in-free-range-eggs-near-dumpsites-globally/?fbclid=IwY2xjawNen6hleHRuA2FibQIxMQABHuesdUG86YN7NFHE57FgikKiVLTJA2VI8TEClqJiARMyl0dc9BrF0pW_czV_aem_vebcvCk_lhFdlldcLBomIQ
87. Nat. Tox. Prog. (2021) 2,3,7,8-Tetrachlorodibenzo-*p*-dioxin. CAS No. 1746-01-6 US Dept. of Health & Human Services. Fifteen Report on Carcinogens
Available at <https://www.ncbi.nlm.nih.gov/books/NBK590813/>
88. Nat. Tox. Prog. (2021) "Polychlorinated biphenyls" CAS No. 1336-36-3 US Dept. of Health & Human Services. Fifteen Report on Carcinogens
Available at <https://ntp.niehs.nih.gov/sites/default/files/ntp/roc/content/profiles/polychlorinatedbiphenyls.pdf>
89. Nat. Tox. Prog. (2021) "Polycyclic aromatic hydrocarbons" Benzo(a)pyrene CAS No. 50-32-8 US Dept. of Health & Human Services. Fifteenth Report on Carcinogens
Available at <https://ntp.niehs.nih.gov/sites/default/files/ntp/roc/content/profiles/polycyclicaromatichydrocarbons.pdf>
90. NGER (2025) "National Greenhouse and Energy Reporting Scheme" Clean Energy Regulator.
Available at <https://cer.gov.au/schemes/national-greenhouse-and-energy-reporting-scheme>
91. NH&MRC (2025) "NHMRC Review of PFAS in Australian drinking water" National Health and Medical Research Council.
Available at https://www.nhmrc.gov.au/health-advice/environmental-health/water/PFAS-review?utm_medium=email&utm_campaign=Publication%20of%20updated%20guidance%20in%20the%20Australian%20Drinking%20Water%20Guidelines&utm_content=Publication%20of%20updated%20guidance%20in%20the%20Australian%20Drinking%20Water%20Guidelines+CID_7a0523093f3ec04b52f621cb74bfdb1a&utm_source=Mailbuild&utm_term=PFAS%20Project%20webpage
92. NWIL&GG Inc. (2025) "Pyromania: The Lara Big Incinerator explained."
See <https://youtu.be/b6mH7AwKoaY>
93. Orellana, M.A. (2023) Statement within "Australia: Deep divide between Government and community narratives on toxics fuels anger and distrust, says UN expert." *UN Office of the*

No Waste Incinerators in Lara & Greater Geelong Incorporated

High Commissioner for Human Rights

Available at <https://www.ohchr.org/en/press-releases/2023/09/australia-deep-divide-between-government-and-community-narratives-toxics>

94. Parliament of Australia (2025) "Senate Inquiry into Greenwashing" Environment and Communications References Committee.
Available at https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Greenwashing48P
95. Parliament of Victoria (2020) "Inquiry into recycling and waste management" Legislative Council Environment and Planning Committee.
Available at <https://www.parliament.vic.gov.au/get-involved/inquiries/inquiry-into-recycling-and-waste-management/reports>
96. Parliament of Victoria (2026) Inquiry into "The development and expansion of waste-to-energy (WtE) infrastructure in Victoria" Legislative Council Economy and Infrastructure Committee
Available at <https://www.parliament.vic.gov.au/wastetoenergyinquiry#terms>
97. Perchard, E. (2016) "UKWIN highlights 'litany of gasification failures'" UKWIN in Resource.co 02 November 2016.
Available at <https://resource.co/article/ukwin-highlights-litany-gasification-failures-11459>
98. Petrlik J, et alia (2022) Monitoring dioxins and PCBs in eggs as sensitive indicators for environmental pollution and global contaminated sites and recommendations for reducing and controlling releases and exposure. Emerging Contaminants Vol 8, 2022, pages 254-279.
Available at <https://www.sciencedirect.com/science/article/pii/S2405665022000166?via%3Dihub>
99. Petrlik J. et alia (2025) "Review of brominated flame retardants and polybrominated dibenzop-dioxins and dibenzofurans in eggs and contamination sources" Emerging Contaminants Vol. 11, Issue 4.
Available at <https://www.sciencedirect.com/science/article/pii/S2405665025001015>
100. PHAA (2024) "Waste Incineration Policy Position Statement." Public Health Association of Australia, Canberra A.C.T., September 2024.
Available at <https://www.phaa.net.au/common/Uploaded%20files/SIG%20documents/Ecology%20and%20Environment%20SIG/PPS%202024/0520 - EE - Waste Incineration - 2024.pdf>
101. Planning Permit Application PA2001035
Available at <https://www.planning.vic.gov.au/planning-approvals/ministerial-permits-register/ministerial-permits/96315d65-8733-eb11-a813-000d3ad0ea2d>
102. Raloff J. (2004) "Even Nunavut gets plenty of dioxin." Science News 16 January 2004
Available at <https://www.sciencenews.org/article/even-nunavut-gets-plenty-dioxin>
103. PR Newswire (2025) "Top 10 Global Waste-to-energy Equipment Brands of 2025 Revealed"
Available at <https://www.prnewswire.com/apac/news-releases/top-10-global-waste-to-energy-equipment-brands-of-2025-revealed-302530884.html>
104. Rollinson A.N. (2018) "Fire, explosion and chemical toxicity hazards of gasification energy from waste." Journal of Loss Prevention in the Process Industries, Volume 54, July 2018, Pages 273-280. Elsevier (Publ.)
Available at <https://www.sciencedirect.com/science/article/abs/pii/S0950423018301323>
105. Rollinson A.N., Jumoke Mojisola Oladejob (2019) "'Patented blunderings', efficiency awareness, and self-sustainability claims in the pyrolysis energy from waste sector", Resources, Conservation & Recycling 141 (2019) 233-242. Elsevier Publisher.

No Waste Incinerators in Lara & Greater Geelong Incorporated

Available at <https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2025/07/patented-blundering.pdf>

106. Santayana, George (1905) quotation adapted from “The Life of Reason, Or The Phases of Human Progress” Chapter 12: Flux and Constancy In Human Nature, pages 284 and 285, Charles Scribner’s Sons, New York (publisher).
See <https://quoteinvestigator.com/2024/03/04/past-repeat/>
107. SEC (2023) Media release by Hon. Jacinta Allan MP “THE SEC IS BACK: ACCELERATING VICTORIA’S RENEWABLE FUTURE” State Electricity Commission 26 October 2023
Available at <https://www.premier.vic.gov.au/sites/default/files/2023-10/231026-The-SEC-Is-Back.-Accelerating-Victoria’s-Renewable-Future.pdf>
108. Slossian E., & Forster S. (2025) “Soft plastics recycling is back in Australia. How does it work and where does it go?” ABC News
Available at <https://www.abc.net.au/news/2025-12-30/soft-plastics-recycling-is-back-in-australia-how-does-it-work-/105912070>
109. Stallard et alia (2024) “Burning rubbish now UK’s dirtiest form of power” by Esme Stallard, Matt McGrath, Patrick Clahane & Paul Lynch. BBC News.
Available at <https://www.bbc.com/news/articles/cp3wxgje5pwo>
110. Stockholm Convention on Persistent Organic Pollutants (POPs) (2019). See in particular Annex C Part II(a) Available at <https://chm.pops.int/Portals/0/download.aspx?e=UNEP-POPS-COP-CONVTEXT-2025.English.pdf>
111. Stockin et alia (2025) “No place to hide: Marine habitat does not determine per- and polyfluoroalkyl substances (PFAS) in odontocetes” in Science of the Total Environment Volume 1007, 10 December 2025
Available at <https://www.sciencedirect.com/science/article/pii/S0048969725023411>
112. Johan Strandberg, Raed Awad, Dämien Johann Bolinius, Jing-Jing Yang, Jasmin Sandberg, Musbau Adeoye Bello, Laura Gobelius, Liselott Egelrud, Eva-Lena Härnwall (2021) “PFAS in waste residuals from Swedish incineration plants: A systematic investigation” IVL Swedish Environmental Research Institute Ltd. No. 2422 September 2021.
Available at https://www.researchgate.net/publication/356284263_PFAS_in_waste_residuals_from_Swedish_incineration_plants_-_A_systematic_investigation
113. Sustainability Victoria (2025) “Victoria’s 4-bin recycling system.”
Available at <https://www.sustainability.vic.gov.au/recycling-and-reducing-waste-at-home/recycling-at-home/victorias-4-bin-recycling-system>

See also the outcome of the Silver Review at <https://www.sustainability.vic.gov.au/news/news-articles/statement-on-outcomes-from-the-silver-review>
114. Tait P.W. et alia (2020) “The health impacts of waste incineration: a systematic review”, reported in *Aust NZ J Public Health*. 2020; 44:40-8; doi: 10.1111/1753-6405.12939.
Available at <https://onlinelibrary.wiley.com/doi/full/10.1111/1753-6405.12939>
115. Tait, P.W.; Salmons, J.; Sandhu, M.; Guscott, T.; King, J.; Williamson, V. (2025) “Economic, Environmental, and Sociopolitical Aspects of Waste Incineration: A Scoping Review.” *Sustainability* 2025, 17, 5528.
Available at <https://doi.org/10.3390/su17125528>
116. Tangri, N. (2023) “Waste incinerators undermine clean energy goals.” *PLOS Clim* 2(6): e0000100. <https://doi.org/10.1371/journal.pclm.0000100>
Available at <https://journals.plos.org/climate/article?id=10.1371%2Fjournal.pclm.0000100&fbclid=IwY2xiaWmXNNdleHRuA2FibQIxMABicmIkETF3ZDJNeVZLb2RGRWhGcVVMAR6CeWhwJhmlyY8o>

No Waste Incinerators in Lara & Greater Geelong Incorporated

[WIByPrYqD4B5Nn1I7YQ2tCpASUcVfuuNjHQtO5woR4ukSg_aem_HpUT9dvy5OWv8U6CtE OboQ](#)

117. Tishman (2019) "U.S. Municipal Solid Waste Incinerators: An Industry in Decline." Available at https://static1.squarespace.com/static/5d14dab43967cc000179f3d2/t/5d5c4bea0d59ad00012d220e/1566329840732/CR_GaiaReportFinal_05.21.pdf
118. ToxicoWatch (2025) "Biomonitoring projects: Netherlands, Basque Country Spain, Belgium, France, Slovakia, Spain, Czech Republic, Lithuania" ToxicoWatch Available at <https://toxicowatch.org/biomonitoring-projects/#1622>
119. Kevin J. Tu, Christopher D. Heaney, Greg Sawtell, Carlos Sanchez, Bonita Salmerón, Matthew A. Aubourg, Shiladitya DasSarma (2025) "Health damages and disparities from municipal and medical waste incineration in Baltimore, USA." See doi: <https://doi.org/10.1101/2025.06.27.25330313>
Published as a pre-print at https://www.medrxiv.org/content/10.1101/2025.06.27.25330313v2.full?fbclid=IwY2xjawL00JhleHRuA2FibQlxMQABHoXaNujwn8nMEqibHrwxlOjPxlZ7mLvmz_04a-nLbnMG5TpZlxELhZXkdYYG_aem_si9PXw7-Rxp3QsBO7f3XZA
120. UKWIN (2016) "Gasification Failures in the UK: Bankruptcies and Abandonment." Available at https://www.ukwin.org.uk/files/pdf/UKWIN_Gasification_Failures_Briefing.pdf
121. UKWIN (2021) "Good Practice Guidance for Assessing the GHG Impacts of Waste Incineration" Principal author: Josh Downen — Reviewed by: Shlomo Downen. Available at <https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/04/UKWIN-2021-Good-Practice-Guidance-for-Assessing-the-GHG-Impacts-of-Waste-Incineration.pdf>
122. UKWIN (2024) "UK Energy from Waste (EFW) Sector: Considerations for Potential Investors in UK EFW Projects" Produced by Only Solutions LLP December 2024. See in particular pages 25 & 26. Available at <https://ukwin.org.uk/Considerations-for-EfW-Investors.pdf>
123. UN Environment (2019) "Waste to Energy: Considerations for Informed Decision-Making" Available at <https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2025/07/WTEfull.pdf>
124. US EPA (2025) United States Environmental Protection Agency Code of Federal Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Ea/section-60.51a>
125. Vahk J. & Arkenbout A. (2025) "New data links waste incinerators to toxic contamination in surrounding environments – Spain, France, Netherlands." ToxicoWatch 1 April 2025. Available at https://zerowasteurope.eu/press-release/new-data-links-waste-incinerators-to-toxic-contamination-in-surrounding-environments-spain-france-netherlands/?fbclid=IwY2xjawKet2BleHRuA2FibQlxMABicmlkETF3eUQ0SXN0Zk5KcjN5RVpiAR6a_WSL8X4ID3XJd8lml0ZEKxozzplRT1MglWIPfqiS53bQNSs_D3YI83UJTQ_aem_-NYZt4BX7QvWTMaSNbeTlw
126. VCAT (2025) L. Bisinella Developments Pty Ltd v Environment Protection Authority [2025] VCAT 159 (20 June 2025). Determination of P1641/2023, the Declarations case. Available at <https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/vic/VCAT/2025/159.html>
127. Vernez D. et alia (2023) "Polychlorinated dibenzo-p-dioxins (PCDDs) and dibenzofurans (PCDFs) soil contamination in Lausanne, Switzerland: Combining pollution mapping and human exposure assessment for targeted risk management." *Environmental Pollution* 316 Part 1. Available at <https://www.sciencedirect.com/science/article/pii/S0269749122016554?via%3Dihub>

No Waste Incinerators in Lara & Greater Geelong Incorporated

128. VicGrid Engage Victoria (2025) “Developing the 2025 Victorian Transmission Plan” Available at <https://engage.vic.gov.au/victransmissionplan>
129. Victorian Legislation (2017) Environment Protection Act 2017 Available at <https://www.legislation.vic.gov.au/in-force/acts/environment-protection-act-2017/017>
130. Victorian Legislation (2023) “Circular Economy (Waste Reduction and Recycling) (Waste to Energy Scheme) Regulations 2023” Available at <https://www.legislation.vic.gov.au/in-force/statutory-rules/circular-economy-waste-reduction-and-recycling-waste-energy-scheme/002>
131. Vom Saal & Vandenberg (2020) Update on the Health Effects of Bisphenol A: Overwhelming Evidence of Harm. *Endocrinology*. 2021 Mar; 162(3): bqaa171. Published online 2020 Sep 23. Available at <https://academic.oup.com/endo/article/162/3/bqaa171/5910267?login=false>
132. Williams R. et alia (2023) “Spatiotemporal Trends Spanning Three Decades Show Toxic Levels of Chemical Contaminants in Marine Mammals.” *Environmental Science and Technology* 2023, 57, 20736–20749 . Available at <https://pubs.acs.org/doi/10.1021/acs.est.3c01881>
133. Peiwei Xu, Lizhi Wu, Yuan Chen, Dandan Xu, Xiaofeng Wang, Haitao Shen, Jianlong Han, Qiuli Fu, Zhijian Chen, Xiaoming Lou (2019) “High intake of persistent organic pollutants generated by a municipal waste incinerator by breastfed infants” *Environmental Pollution* 250 (2019) 662-668, Published by Elsevier. Available at <https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/04/high-POP-in-babies-near-incinerator.pdf>
134. ZWE (2019) “The hidden impacts of incineration residues: Case Study.” November 2019 – ToxicoWatch. Available at <https://www.scribd.com/document/881932235/Zero-Waste-Europe-Cs-the-Hidden-Impacts-of-Incineration-Residues-en-1>
135. ZWE (2021) “The EU is clear: Waste-To-Energy incineration has no place in the sustainability agenda.” written by Kassandra Makavou for Zero Waste Europe. Available at <https://zerowasteurope.eu/2021/05/wte-incineration-no-place-sustainability-agenda/>
136. ZWE & GAIA (2022) “Toxic fallout: Waste incinerator bottom ash in a circular economy. Research Report - January 2022.” Available at https://zerowasteurope.eu/wp-content/uploads/2022/01/zwe_Jan2022_toxic_fallout_research_report.pdf
137. ZWE (2022) “Incineration residues in the EU: Quantities and fates” Report - September 2022 – Equanimator Ltd. for Zero Waste Europe. Available at https://www.toxicsfreeaustralia.org.au/wp-content/uploads/2024/04/ZWE_2022_Report_Incineration_residues_EU_quantities_fates.pdf
138. ZWE (2023) “Shaping the EU sustainable finance package for a circular economy.” Available at <https://zerowasteurope.eu/impact/legislation-victories/>
139. ZWE (2023) “The winning formula for cities” by Jack McQuibban Available at <https://zerowasteurope.eu/2023/06/the-winning-formula-for-cities/>
140. ZWE (2024) “Reducing waste management’s contribution to climate change: from post-landfilling methane capture to pre-landfill methane prevention” Author: Dominic Hogg, Zero Waste Europe (Publ.), June 2024. Available at https://zerowasteurope.eu/wp-content/uploads/2024/06/zwe_Jun24_report_CEAP_methane_prevention.pdf
141. ZWE (2025) “Call for a moratorium on new waste incineration in the EU” A letter to the President of the European Commission from Zero Waste Europe

No Waste Incinerators in Lara & Greater Geelong Incorporated

Available at <https://zerowasteurope.eu/wp-content/uploads/2025/09/ZWE-Sep25-joint-letter-moratorium-on-new-waste-incineration-1.pdf>

142. ZWE (2025) “Krk’s journey to zero waste.” Authors: Marko Košak, Zero Waste Croatia, and Manon Jourdan, Zero Waste Europe.
Available at <https://zerowasteurope.eu/wp-content/uploads/2025/12/EN-ZWE-case-study-Krks-journey-to-zero-waste.pdf>
143. ZWE (2025) “New data links waste incinerators to toxic contamination in surrounding environments – Spain, France, Netherlands” Zero Waste Europe.
Available at https://zerowasteurope.eu/press-release/new-data-links-waste-incinerators-to-toxic-contamination-in-surrounding-environments-spain-france-netherlands/?fbclid=IwY2xjawJZT-RleHRuA2FibQIxMAABHeLUPqgftzkJp-tXKe-Krd-oCn2EBqetD003YKXGx3dPgEaZkieuFBF2IA_aem_5NtKUG2L9Aa_AEY_c4xJSQ#:~:text=B%20A,%20France%20and%20The%20Netherlands