

CITY OF GREATER GEELONG

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The Hon. Sonya Kilkenny
Minister for Planning
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20 September 2023

Doc No: D23-455411

Dear Minister Kilkenny,

Re: Proposed waste-to-energy facility, Lara (APP1004200)

I am writing regarding the Prospect Hill International Pty Ltd application for a waste-to-energy facility at 164-200 McManus Road, Lara. This application is currently being considered by EPA Victoria.

A number of community members and groups, including the [Geelong Sustainability Group](#), have approached Council with concerns regarding the potential impacts of this facility.

As a referral authority, Council's role in this process to date has been limited to providing advice and feedback regarding the application's consistency with the Planning Scheme.

However, as local representatives, we have also agreed to pass community concerns directly to you as the Responsible Authority for this planning application.

The concerns predominantly relate to health and environmental impacts, particularly in relation to schools and preschools located within 5km of this proposed facility, as well as residential homes located as close as 350m away.

We have also heard questions regarding the safety and viability of the facility, with no defined contractual, management or emergency arrangements in place.

I have provided a high-level summary of the health and environmental concerns below, including links to research and information used as the basis for these concerns. We acknowledge that this information has also been provided in several submissions to the EPA.

Community health impacts

There is significant concern about environmental contamination caused by waste-to-energy facilities, and how this may adversely impact community health. This includes air pollution and food contamination.

Community members have referred Council to [a recent study](#) by Dr Peter Tait and 10 other Health professionals from the Australian National University which has found a range of adverse health effects in relation to environmental

contamination from waste-to-energy facilities. This includes significant associations with some cancers, birth defects, infant deaths and miscarriage.

It is important that these potential impacts and risks to community health are rigorously investigated prior to any decision being made relating to this application.

Environmental impacts

Community members have expressed concern regarding the environmental impact of this facility. The facility will generate considerable carbon emissions due to the burning of plastics, contributing to an increase in Victoria's greenhouse gas emissions.

This proposed incinerator will produce greenhouse gas (GHG) emissions directly from the combustion of waste, ancillary gas burning and the use of a diesel generator onsite. The application for this proposal states that in total, the facility is expected to produce 4.8 million tonnes of carbon dioxide equivalent (tCO₂e) over its lifetime. It will also generate further emissions from the transport of waste to and from the facility.

Significantly, the Greater Geelong community has set a target to achieve zero emissions by 2035, which is a key objective of Council's [Climate Change Response Plan](#). This is consistent with the Victorian government state-wide target to achieve [net zero emissions by 2045](#).

In addition to the concerns regarding the GHG emissions, questions have been raised about the volume of waste the facility will burn, which is 400,000 tonnes more than what is currently available in South-West Victoria. There is no clear answer or plan from the proponent as to where the extra waste will come from and how it will be transported to facility.

Further details regarding these potential environmental and health impacts are included in the [submission provided by Environmental Justice Victoria](#).

We appreciate your consideration of this information in determining the outcome of this planning application.

Thank you for your ongoing commitment to ensuring all planning decisions are made in the best interests of the Victorian community.

Regards,



**Cr Trent Sullivan
Mayor**

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