[Your Full Name]
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[Town, Postcode]

[Date]

Mayor Tom Sharp
Councillors, Scenic Rim Regional Council
PO Box 25, Beaudesert QLD 4285

RE: Urgent Objection - Health and Environmental Impacts of the Proposed BERC Waste-to-Energy Incinerator, Bromelton

Dear Mayor Sharp and Councillors,

I am writing to you not just as a resident, but as someone who lives in this landscape, grows food in it, breathes its air, and drinks its water. The proposed Bromelton Energy and Resource Centre (BERC) is not a marginal planning matter. It is a proposal to introduce a toxic industrial facility into one of Australia's most ecologically significant food-producing regions and the science on what that means for human health and the natural world is damning.

I want to address directly the framing that has entered Council's recent deliberations specifically - the use of Dubai's Warsan Waste-to-Energy facility as a reference point. I been shown the CoMSEQ Post Mission Report tabled at Council's January 2026 Ordinary Meeting. I ask that Council now read, with equal care, what the independent scientific research says about modern, regulated waste incinerators in comparable Western contexts, because the two pictures are very different.

What Council's Own Report Claims — and What the Evidence Shows

The CoMSEQ Post Mission Report tabled at Council's January 2026 meeting states that Dubai's Warsan facility demonstrates "modern plants can be successfully integrated into dense urban environments without compromising public health or amenity," and that "WtE can be positioned as urban infrastructure, not remote industrial assets."

I ask Council to sit with that last phrase: "not remote industrial assets."

The Bromelton State Development Area is not a dense urban environment. It is adjacent to food-producing farmland, riparian corridors, and communities whose livelihoods and health depend on clean soil, clean water, and clean air. The report's own logic that WtE works at metropolitan, urban scale is an argument against siting a facility in a rural and regional food-producing corridor. If anything, the Mission Report has handed the community a useful counter-argument.

Beyond the context mismatch, there is a more fundamental problem: the public health claim embedded in that report is contradicted by current, peer-reviewed, independent research.

What Is Actually Happening Near Modern Incinerators: The Paris Evidence

The Ivry-Paris XIII incinerator in the Ivry-sur-Seine suburb of Paris is a modern, regulated, continuously monitored waste-to-energy facility precisely the type cited in the Mission Report as safe. Independent biomonitoring research by the ToxicoWatch Foundation, conducted from 2021 through to 2025 with support from Zero Waste Europe, has found the following:

- In 2021, dioxin levels in backyard chicken eggs collected near the incinerator were tested. 83% of samples exceeded EU food safety action limits. The French national public health authority (ARS) conducted its own broader study and confirmed elevated dioxins and PFAS across the Paris region. It officially declared eggs from affected backyards unsafe to eat.
- A schoolyard playground near the incinerator was found to contain dioxin contamination exceeding EU legal thresholds. Children playing in that yard were being exposed.
- Research in 2024 – 2025 tested the air filters of primary school classrooms in the surrounding area. They found dioxins, PFAS (forever chemicals), PCBs (compounds banned decades ago), and PAHs, a chemical also found in cigarette smoke. PFAS levels in the air filter dust were exponentially above EU safety limits.
- Dioxin levels in surrounding soil have increased sevenfold since 2013. Contamination was confirmed at the Jardin des Plantes, a public park 2.5 kilometres from the facility.
- Over a two-year period, the facility recorded almost 7,000 hours of emissions exceedances and operational failures, not as a poorly run outlier, but as a monitored, reported facility operating within the regulatory system.

This is not a developing nation with weak regulation. This is Paris. With continuous monitoring. With EU emissions standards. With exactly the kind of "advanced flue gas treatment" the Mission Report cites as evidence of safety.

Forever Chemicals: What They Do to Human Bodies

PFAS, per- and polyfluoroalkyl substances, are called 'forever chemicals' because they do not break down in the environment or the human body. They accumulate across generations. Peer-reviewed research has directly linked PFAS exposure to:

- Birth defects and developmental delays in children
- Cancer including liver, thyroid, kidney, and testicular cancers
- Reduced immune function and disrupted vaccine response, particularly in children
- Hormone disruption, liver disease, and thyroid disease
- Reproductive harm across generations

Waste incineration is a documented source of PFAS emissions. A 2023 study of a Swedish incinerator, operating within standard approved temperature ranges, found PFAS present in exhaust emissions. The US EPA has acknowledged that if operational conditions are not perfect, "all bets are off." The Paris data shows that even with continuous monitoring, exceedances happen at scale, almost 7,000 hours worth over two years.

Why Dubai Cannot Speak for the Scenic Rim

The Warsan facility is the world's largest waste-to-energy plant. It processes 6,000 tonnes of municipal waste per day in a desert city-state with no food-producing farmland, no agricultural tourism economy, no water catchments feeding agricultural land, and no biodiversity corridors of the kind that define the Scenic Rim. It was built to serve a megacity's waste crisis in an arid urban environment. It is surrounded by industrial infrastructure, logistics hubs, and highways not farms, orchards, and rural communities raising children.

The Mission Report itself states that the lesson for SEQ is "not to replicate Dubai's scale or style." We agree. So why is the Warsan facility being used to normalise waste-to-energy in a food-producing rural context?

There is also a material fact the Mission Report does not address: the Warsan facility produces 1,000 tonnes of toxic bottom ash every single day. That ash contains concentrated heavy metals and persistent organic pollutants. In Dubai it is currently being used in road construction. What happens to the ash produced by a Bromelton facility? Where does it go? Who is responsible for it? These questions have not been answered by the proponent, and Council should require that they are.

What This Means for This Place

The Scenic Rim is not an abstract policy setting. It is a living, food-producing landscape. The Paris research tells us plainly what happens when persistent organic pollutants enter an environment near human habitation and food production:

- Contamination does not respect fence lines. Dioxins and PFAS move through air, soil, water, and vegetation. Pasture eaten by livestock becomes contaminated. Backyard eggs become unsafe. Produce grown nearby absorbs pollutants. The Paris research confirmed contamination spreading to parks 2.5 kilometres from the facility.
- Children are the most vulnerable. Their developing bodies accumulate persistent chemicals at higher rates and with more severe developmental consequences - birth defects, developmental delays, immune disruption. There are children living, attending school, and growing up within the affected radius of a Bromelton facility.
- Once contamination enters a food system, it cannot be undone. The Scenic Rim's food production reputation, built painstakingly over decades, would be irreparably damaged by a single confirmed contamination event. You cannot un-contaminate soil.
- The region's water catchments feed some of South East Queensland's most sensitive systems. Persistent chemical contamination of waterways is a generational problem with no remediation pathway.

What I Am Asking of Council

Council has received a well-resourced report from a CoMSEQ-funded international mission promoting waste-to-energy as modern, safe infrastructure. The community has not had equivalent resources to place the contrary evidence before Council. I am attempting, in this letter, to begin to redress that imbalance. I ask that Council:

- Formally oppose the BERC proposal on health and environmental grounds and communicate that position directly to the Coordinator-General and the Queensland Government.

- Commission independent scientific advice specifically assessing whether the proposed BERC emissions monitoring framework is adequate to protect a food-producing rural region, not a dense urban precinct.
- Require the proponent to answer, in writing and in public, what happens to the toxic fly ash and bottom ash this facility would generate daily, specifically where it goes, how it is transported, and who bears liability for its management.
- Formally request that any comparative analysis used to inform Council's position be drawn from waste-to-energy facilities operating in comparable rural, food-producing, biodiversity-significant contexts. Not from a desert megacity's metropolitan waste infrastructure.
- Engage formally with the community organisations and residents who have been compiling the international evidence base on this proposal, and ensure that evidence is given equal weight to the CoMSEQ Mission Report in Council's deliberations.

The research from Paris is not a warning from the future. It is a report from the present. Children are being exposed to dioxins in their school playgrounds. Families have been told their backyard eggs are unsafe to eat. Primary school classrooms have been found to contain forever chemicals at levels exponentially above safety limits. These are not theoretical risks, they are documented outcomes of exactly the type of facility being proposed for our region.

Council's January report states that "community acceptance is closely linked to design quality, transparency, and regulatory confidence." I would add: and the truth. The community of the Scenic Rim deserves the full truth about what the international evidence shows, not a carefully selected case study from a context that bears no resemblance to this one.

I am asking Council to stand between this community and irreversible harm. Our children, our land, our water, and our food deserve that protection.

Yours sincerely,
[Your Name]

Key sources referenced in this letter:

Scenic Rim Regional Council Ordinary Meeting Agenda, 28 January 2026, Item 11.2: CoMSEQ October Mission 2025 Post Mission Report (Dubai).
ToxicoWatch Foundation / Zero Waste Europe: 'The True Toxic Toll' biomonitoring series, Paris (Ivry-sur-Seine), 2021–2025. zerowasteeurope.eu
ToxicoWatch Foundation: 'PFAS, Dioxins and PAH in Primary School Air Filters, Ivry-sur-Seine', 2025. zerowasteeurope.eu
Trasande et al., 'Forever chemicals: the persistent effects of PFAS on human health', eBioMedicine / The Lancet, 2023.
Capitao et al., 'Waste incineration and cancer mortality', European Journal of Public Health, 2023.