

A tale of two incinerators.

The first incinerator was proposed in Matraville, in Western Sydney, by the company Veolia.

Local groups representing the communities surrounding the proposed incinerator of the Matraville site, local councils, and Members of Parliament vocally opposed this project variously as a big polluter and a threat to human health.

The NSW State government leapt into action and rushed through legislation that banned such incinerators from being built in the Greater Sydney Basin. Indeed, anywhere in NSW (with some exceptions) unless they are replacing coal. Classed as less clean even than natural gas, they are so polluting they only rank above coal.

The Matraville Incinerator proposal came under State Significant Legislation, because of its overall fiscal worth, and not, obviously, because the State viewed it as significant. The State Significant Legislation is designed to favour the proponent to the extent that the NSW Department of Planning and Environment can't stop it going ahead. Indeed, it seems not much can. This legislation is geared to major projects such as highways and airports, that are, in fact, of state significance. Thus the NSW Department of Planning and Environment "requested" the company to withdraw the Matraville Incinerator.

Fortunately for the company behind the proposal part of the new government legislation gave Veolia permission to build this same incinerator at its pre existing works in Tarago, in southern NSW, near Canberra. This was a particular blessing for Veolia, as it already had lodged an application for a waste to energy incinerator at this same location. It would be tempting to see the inclusion of the Tarago site as a "sweetener" to ensure this project was withdrawn from Matraville. Certainly, there is nothing sweet about this for the people of Tarago and surrounds who are plagued by a really bad smell.

So we come to the second Incinerator proposal in Tarago. Again, the technology is the same as Matraville. The company behind the proposal is the same. But unlike Matraville, where it was legislated an incinerator of this nature could not be built unless it replaced coal, the same legislation specifically states an incinerator of this nature can be built at Tarago. The proposed incinerator does not replace energy production using coal, and thus does not meet the requirements of the current legislation covering all of NSW, but Tarago is one of the 4 sites (well away from Sydney) designated by the legislation as the exception to the legislation.

Is this a case of Sydney saying "not in my backyard"? It would seem so. (Additional irony, its Sydney's rubbish).

Apparently, if you move the location of an incinerator; even with the same company and the same technology, a miraculous change can occur, and it becomes perfectly safe and entirely non polluting. Reading the EIS, one wonders

why you couldn't put them anywhere, including Matraville. In fact, with reference to organic farming levels of safe outputs, you could smoke hams for human consumption in the huge smoke stack, the output of which would have done such terrible damage to air quality in Matraville.

Unless, of course, the EIS is misleading.

The company has a track record of misleading the community in prior EIS' that provided estimates that are a far cry from the lived reality.

This can best be demonstrated by examining odour.

Veolia is currently operating a waste disposal site in an old mine a few kilometres from Tarago. Trucks and rail bring garbage (largely from Sydney) and put it into the mine as landfill. This is an Eco Precinct. Something to remember if you are looking for a good example of "greenwashing".

The Woodlawn Expansion Project EIS in 2010 , Air Quality and Odour, 9.5.1 Conclusions states

"Atmospheric dispersion modelling of odour has indicated that at all surrounding residences, odour is predicted to be at concentrations less than 4.1 ou as a 99th percentile"

However, this is not the lived reality of the people who dwell near Veolia's works. People can smell the waste disposal facility from more than 10 km away. The smell is bad, and interferes with quality of life.

Veolia has had to set up a special hotline for complaints, and there are a lot. The EPA also receives complaints and logs them as group summaries to the complaints register.

Complaints come in from Collector, Lower Boro, Tarago, Currawang, Mount Fairy, Lake Bathurst and Gundaroo.

Most complain of an offensive odour. Some have complained it is inside their dwelling, as well as out. Tarago Public School staff keep an odour log and report their results to the EPA. Hardly an ideal learning environment.

The Environmental Protection Licence under which Veolia operates its current waste disposal facility states

"L6.1 The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises"

The Braidwood Times on November 5, 2022 reported

"multinational waste handling giant Veolia has admitted to breaching environmental guidelines at its Woodlawn facility near Tarago just days before releasing its environmental impact study promoting a huge 600 million expansion of the operation...".

The company seem to have got the estimates of odour wrong. There are continual and numerous complaints. However, the facility continues to operate, self regulated and stating it is meeting all guidelines. The company acknowledges the communities "concerns" regarding odour, the ongoing complaints and even offers some belated remedies (we can make the doors shut faster). And yet, in the current EIS, insists the odour levels are compliant. The beauty of self regulation.

In relation to odour, the proponent does not appear to have a good track record of achieving accuracy in the estimates provided in the past, and current documents.

The potential of the current project to add dangerous emissions to the air that people breathe, to the water they drink, to the soil they earn their livelihood on, is concerning in this context. Have they got pollution estimates right?

Our society has long understood water is a shared resource, and no one individual should be allowed to pollute this resource. Gone are the days when companies had large pipes sending industrial waste straight into rivers. Water, as a shared resource, is monitored, studied, funded and legislated.

It is not yet the same for air.

Air quality is increasingly becoming the focus of our attention as an important shared resource we all need to live. The bushfire period taught us clean air is not a given. The Covid pandemic has taught us fresh air and ventilation can be key to our survival. Just as a company upstream does not have the right to put toxic waste into a river system, a company does not have the right to add pollutants and toxins to our air.

Air quality has the strongest impact on climate change. Australia has experienced four one hundred year floods in two years, and areas of NSW and South Australia are flooding again. Severe drought with record breaking high temperatures, followed by a bushfire season that decimated our biodiversity, cost millions in damage, and this just in the last few years. Climate change is here, and we need to act whenever and wherever possible to minimise our contribution.

Australia has an obligation to current and future generations and to the global community to minimise polluting industries. Particularly where they can be replaced by industries that are more environmentally friendly. The NSW State governments legislation to not allow waste to energy incinerator systems to replace anything but coal is excellent legislation. So why the exceptions?

People in Tarago deserve the same protections as those in Matraville.

I object to the proposed waste to energy incinerator in Tarago

Questions to the NSW Department of Planning and Environment

1. The carbon footprint of waste disposal increases the further it travels. Please justify the added carbon footprint of shipping waste from Sydney to Tarago?
2. Does including Tarago as a permissible waste to energy site, unduly favour the proponent, given they had a pre-existing application to build an incinerator there?
3. The current complaints register for existing operations at Veolia's eco precinct clearly indicates the proponent is having ongoing difficulties meeting acceptable odour output levels. Is it appropriate the company be allowed to expand operations under these conditions?
4. Waste management is a local council issue. Why is a proposal for the management of Sydney's waste in the hands of the State Government? Particularly as rubbish will be organised and collected by local Sydney councils, and the local councils of Goulburn, Queanbeyan and Yass are strongly opposed
5. Is it appropriate to have a site for a waste to energy incinerator so close to another Territory's border, particularly as the ACT have banned waste to energy incineration in the ACT?
6. Why is the pollution from a waste to energy incinerator not acceptable in a highly polluted urban environment, but is acceptable in a less polluted rural environment?
7. Does the Department intend to conduct an independent assessment of pollutants, including the full range of potential pollutants such as dioxins?
8. Will cumulative impacts on surrounding populations, including sensitive receptors such as schools, be taken into consideration in the Department's assessment of this proposal?

Questions to the Proponent

1. In the EIS, you state you adhere to the good neighbour principle. In what way does the complaints log, recording numerous complaints from the community regarding offensive odour, reflect that compliance?
2. In the EIS, you provide estimates of odour based on averages. Given odour events are absolute, how useful is it to provide averaged data?
3. Why did you include air quality data from a bad bushfire day in the EIS. Was it
 - A. To remind the readers of the dire consequences of climate change as they read your report?
 - B. To remind people what it's like to be wearing a mask at all times in incredible heat because the poor air quality is a threat to human health
 - C. To reassure the reader that the pollution levels from the waste to energy incinerator are nowhere near as bad as a national disaster that produced enough smoke to blanket New Zealand and circle the globe?
 - D. other?
4. The EIS states that the proposal has no implications for human health. On what did you base this assessment, when the Australian Public Health Association has warned that even new incinerators are associated with adverse impacts on human health?

5. In your estimates on air quality have you considered all potential pollutants that could exist in waste that is gathered and sorted by a third party, arrives in large compressed cubes, and is checked onsite by “eyeballing”?

Thank you
Sharn Ogden