

I object to the proposed Woodlawn Advanced Energy Recovery Centre Proposal (the Proposal),
SSD-21184278

My name is Julie Campbell and I live at and own Argyle Lodge, Mooneys Rd, Currawang, nine kilometres from the proposed Waste Incinerator. I object to the Proposal on the grounds that:

- the Proposal produces formally acknowledged negative health and environment impacts and shifts these impacts from one community group to another;
- the proposed operator, Veolia, has a history of failing to manage emissions on the proposed site;
- the Proposal fails to adequately accept or address community concerns regarding pollution and toxic emissions and has failed to obtain a social license to operate.

Objection One: The Proposal produces formally acknowledged negative health and environment impacts and shifts these impacts from one community group to another

The Proposal states that feedstock for the waste incinerator will be sourced entirely from the Sydney Basin.

This Proposal shifts those risks and impacts from Sydney (the waste contributor for the Proposal's feedstock) to the Greater Lake George region, including the towns of Tarago, Collector, Bungendore, Lake Bathurst and Goulburn and multiple rural residential localities such as Lake George, Currawang and Mt Fairy. The Proposal essentially treats the Lake George Region as a 'third world' in which to dump high risk activities.

Proposals for similar facilities in Sydney have been rejected by the NSW Independent Planning Commission. Reasons for the rejection included:

- insufficient evidence that the proposed facility would be capable of managing emissions;
- concern about the relationship between air quality impacts and water quality impacts;
- the possibility of adverse environmental outcomes, and concern about site suitability; and
- human health impacts.

The NSW Government has subsequently banned toxic waste incinerators in Sydney due to the risk to human health, acknowledging in the *Energy from Waste Infrastructure Plan* that "Populations can still experience health impacts when emissions are below the national standards, and for some common air pollutants, there is no safe threshold of impact".

Both the NSW Independent Planning Commission decision and the NSW Government decision are formal acknowledgements of the negative impact of any waste incinerator proposal.

In 2019 a report issued by academics from the Australian National University Medical School, the Public Health Association of Australia, and Council of Academic Public Health Institutions Australia concluded that "there is insufficient evidence to conclude that any incinerator is safe" and that

“contamination of food and ingestion of pollutants is a significant risk pathway for both nearby and distant residents”.

The risks have not changed. If a waste incinerator is unsafe for Sydney, then it is even more unsafe for communities dependent on rainwater collection for drinking water and for whom farming and agricultural pursuits, whether commercial or backyard, are the norm not the exception. It is inappropriate to

Additionally, the proposed site is within a basin. There are properties and residences at a higher elevation than the proposed facility and smokestack. The proposal has failed to identify the impact derived from the facility being significantly lower than the surrounding landscape. There is no acknowledgement or assessment of how the location of the facility within a basin, particularly when combined with highly localised weather patterns (fog, strong easterly winds in warmer months blowing back into the basin), will affect the distribution, trapping and concentration of emissions and particulates and exacerbate the identified risks.

Objection Two: The proposed operator, Veolia, has a history of failing to manage emissions on the proposed site.

The issues detailed in Objection One are compounded when combined with the proposed operator's, Veolia, failure to adequately manage emissions from its existing facility at the proposed location, the Woodlawn Bioreactor.

- Veolia has a track record locally for failing to comply with license conditions at their existing Woodlawn facility. Veolia has failed to manage odour emissions. The odour from the Woodlawn Bioreactor is persistent and can be so strong that it can be tasted, not just smelt. The odour emissions have not been resolved by Veolia for years and are an ongoing issue impacting the local community and visitors to the area.
- Veolia has failed to manage pollution discharges into the surrounding environments from its Woodlawn Bioreactor. These breaches were not made public and were not transparent to local impacted communities. These breaches are ongoing over multiple years.
- The proposed incinerator will exceed NSW government safety standards for air emissions during start-up, shut-down and many other 'non-standard' operating conditions. Veolia's overseas incinerators often exceed safety standards.

It is incumbent on the NSW Government to ensure that management of a facility type already deemed unsafe is not granted to an entity with a track record of failing to adequately manage emissions and pollution.

Objection Three: The Proposal fails to adequately accept or address community concerns regarding pollution and toxic emissions and has failed to obtain a social license to operate.

The NSW Energy from Waste Policy states that incinerator proposals are only valid where “community acceptance to operate such a process has been obtained”. The local community is

overwhelmingly opposed to the Proposal. The Proposal does not address the following community concerns.

- We should not be treated as a 'second tier' population on whom it is acceptable to dump other communities' waste along with the impacts that arise with managing that waste.
- The proposed waste incinerator facility is simply unnecessary. Improvements to waste management under the NSW Government's circular economy policies mean the existing Woodlawn landfill has a remaining useful life of considerably more than 25 years, rendering the need to divert waste to an incinerator unnecessary.
- The facility is not climate friendly. Adding a turbine to an incinerator does not make it a renewable or green resource. The proposed facility will emit 140,000 tonnes of greenhouse gases (CO₂) each year and is inconsistent with the NSW government commitment to Net Zero emissions by 2030. The establishment of waste incinerators is an encouragement to burn instead of recycling, reusing and reducing waste products.
- The proposed waste incinerator facility produces toxic pollution, including acid gases, heavy metals and 'forever' chemicals (dioxins, furans, PCBs and PFAS). In addition to polluting the air, dioxins and furans will accumulate in the surrounding environment over time in soil and water.
- The proposed waste incinerator will create 2.2million tonnes of toxic waste ash, including 380,000 tonnes of air pollution control residue (fly ash) which is classified as hazardous waste by the Environmental Protection Authority (EPA). All of this will be dumped on site, risking further contamination of soil and groundwater as well as the Sydney water catchment. Veolia's has a track record of polluting local groundwaters (recognised by EPA prevention notice in October 2022) and cannot be trusted to appropriately manage the waste ash.
- The Proposal is better suited to a locality where there is both higher unemployment and high levels of community support. There are already a number of State Significant Developments in the area and more are not needed. There are few economic benefits to the community from this proposal. Despite claims made by Veolia, there are only a very small number of ongoing jobs created and required in order to manage and maintain the incinerator once constructed. The creation of this small number of jobs would in no way make up for the negative economic impact of reduced property values and the costs of increased healthcare and ongoing damage to roads.