

From: [James](#)
To: [DPE PS Industry Assessments Mailbox](#)
Subject: OBJECTION TO WOODLAWN ARC (SSD-21184278)
Date: Friday, 2 December 2022 11:20:40 AM

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I do not need my name to be withheld.

I am lodging an objection.

I have no political donations to report.

I accept the Department's disclaimer and declaration.

My name is James Reynolds and along with my wife Jade, we run a mixed farming enterprise on 1300 hectares based 5km from the proposed Woodlawn Advanced Recovery Centre. We have 800 cattle for beef production, 3800 sheep for lamb and wool production and wheat and canola which is also produced for human consumption. Following are the reasons I vehemently oppose the plan to build a waste incinerator at the Woodlawn waste facility near Tarago.

It will put dangerous pollutants into our food chain.

This is scientifically proven. "Ash and other residues from waste incineration contain dioxins, furans (PCDD/Fs) and a range of other highly toxic POPs at levels which are a threat to human health and the environment. Current management practices and regulatory threshold levels for POPs that contaminate incinerator residues are not preventing releases of POPs into agricultural settings, the food chain and the broader environment."

Source:

[Toxic ash poisons our food chain](#), Jindrich Petrlik and Lee Bell, IPEN, Revised version: February 2020

It discourages innovation to reuse, recycle and reduce current waste.

"It's time to recognise that Waste-to-Energy incineration is a significant barrier to the circular economy because it burns valuable materials that could be recycled, composted or reused. Burning these resources comes at a high environmental and climate cost and given the urgent need to mitigate exacerbated climate change, we must phase out incineration as soon as possible to keep us below 1.5 degrees warming." JanekVahk, ZWE Climate, Energy and Air Pollution Programme Coordinator.

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It will affect the livelihood of the food producers in the region

Emissions such as Dioxins/Furans have the potential to build up in our soil/stock which in future may impact saleability as consumers and exporters become more discerning. Our crops are at risk of being contaminated due to contaminated soil and water.

It is simply not necessary

At current volumes (which Veolia have stated they are not seeking to increase) the current landfill has a useful life of 25 years. Implementation of the NSW government circular economy

policies may extend that life even further. It is proposed that one third of the current levels of feedstock will be diverted to the incinerator to produce energy via steam production for the next 30 years. The current landfill is already producing energy via the bioreactor. Why put so many livelihoods, health and mental wellbeing at risk when something is already doing the job?

Veolia has a bad track record of managing waste

Veolia have failed in the management of their existing landfill site at Tarago since **2002** as reported by the EPA. For instance, in 2020 and 2021 Veolia did not meet the environmental monitoring and sampling requirements 14 times and had 595 odour complaints! How can they be trusted with an incinerator! Veolia has failed consistently to comply with both of its licences at Crisps Creek Intermodal Facility and the Woodlawn Landfill on an ongoing basis and every year since 2016 and 2017 respectively. Outside of the Woodlawn facility the EPA forced the closure of Veolia's Horsley Park Waste Management Facility because of asbestos mismanagement.

The NSW Independent Planning Commission has already deemed incinerators unsafe

In July 2018 the NSW Independent Planning Commission rejected the proposed Eastern Creek incinerator on the grounds of among other things "insufficient evidence that the pollution control technologies would be capable of managing emissions" As a result the NSW government has banned toxic waste incinerators in Sydney due to risk to human health. Why has the Woodlawn facility been deemed an appropriate site for an incinerator? Because there are less humans to affect?

Incineration may have been the answer in the past but it is not the answer for the future

"Since 1995, the amount of municipal waste incinerated in the European Union [has risen](#) by 105 % and accounted for 61 million tonnes in 2020. Similarly, in 2020 packaging waste [was estimated](#) at 177,2 kg per inhabitant in the EU. Paper and cardboard remain the primary packaging solution, but in the last 20 years, plastic packaging material use [increased](#) by 26.7%. As the proportion of hard-to-recycle plastic waste sent to incinerators increases the carbon impacts of incineration, it is expected that electricity generation at incinerators will soon become closer in carbon intensity to coal and gas than to renewable energy sources: "Making better use of the plastic waste generated within the EU would save the EU several times more gas and oil than burning it for energy," source "Waste Incineration Displacement Benefits too Low to Break EU dependence on Russia Gas, New Study Finds: Forbes.com

We should learn from Europe's experience with incineration, not replicate their experience and be faced with the same burdens in the future. Yes, we cannot continue to put waste into landfill but neither can we just use incineration as the band aid solution.

This will be a burden to future generations and decimate a community.

I worry for the ability of the younger generation of farmers in the area to continue their legacy of producing food for a rapidly growing population. We need more viable farm land not less! I worry about the young children drinking the tank water collected from the roofs of the home their parents work hard to provide. We as adults may not know the accumulative affect of the toxins produced by the incinerator, this will a burden for the children. House and land values will no doubt be adversely affected causing great stress on families which no doubt the children feel the effect of at home.

I can see absolutely no benefit of this project going ahead only stress and misery for those immediately affected and potentially a national health risk as food production in this area is

consumed across the nation. This cannot go ahead.