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Industry assessments

Development Assessment

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**Submission**

Woodlawn Advanced Energy Recovery Centre

Application SSD-21184278

**Submission from**

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Submission

Woodlawn Advanced Energy Recovery Centre

Application No SSD -21184278

From BH & RJ Fairfax , 1163 Taylors Crk Rd Tarago NSW 2580

We object to the application

We object for the following reasons.

Woodlawn at Tarago is not the correct location for an incinerator as proposed by Veolia.

If as we are told that the incinerator is clean and green then locate it close to the source of the waste not at Woodlawn. Reduce transport costs, fuel consumption and subsequent greenhouse gas emissions, cut the cost of upgrading transmission lines, reduce wear and tear on roads and infrastructure, provide jobs for high unemployment urban areas and power to high growth rate urban locations.

Responsible government should be looking at strategies to reduce the amount of waste created from all sectors of the community in the first place and therefore prevent the problem of disposing of waste occurring. A quick fix incinerator at Woodlawn will create irreversible environmental contamination and subsequent long lasting detrimental social and economic effects in a currently productive rural community.

The Woodlawn mine site left a huge void when mining ceased in 1998, which presented Denehurst with the ability to fulfil one of its various end of mine life obligations and an opportunistic solution for Sydney to dispose of its putrescible waste and EPA approved waste, or that was what the original plan was back in 1999 according to the EIS as presented by Collex.

A 4.1.1 of that EIS it was stated that there was approximately 25 million m<sup>3</sup> of potential landfill airspace in the Woodlawn Mine void. Expected fill rate would be in the order of 400,000-500,000 tonnes of waste per annum giving a 40-50 year life for the landfill. The uncontrolled evolution and rapid expansion of that proposal to what it is today now means that the original time frame for the tips capacity has been rapidly reduced. The current licence for reporting period 2022/2023 is 900,000 tonnes by rail to bioreactor 125,000 tonnes of local waste by road and 280,000 tonnes waste to MBT by rail. It is totally unacceptable to now decide that an easy option to extend the life of the landfill would be to burn 380,000 tonnes of the current waste intake a year.

The area surrounding Woodlawn is farming/ grazing country with a long history of producing fine merino wool, prime lambs, beef cattle and sheep for both the domestic and export markets, grain and fodder crops. It is both native and improved country managed to produce clean and green products that comply with industry standards and domestic and export marketing requirements. As second generation farmers we are required to maintain a Biosecurity Plan for the property, have a Property Identification Code (PIC), maintain animal health records and chemical application records for livestock and pastures and crops.

As livestock producers marketing livestock and members of Meat and Livestock Australia we are required to understand the obligations and requirements associated with the use of Livestock Production Assurance (LPA) National Vendor Declarations (LPA NVDs). The Vendor Declarations we sign off on are our guarantees that the information that is given in response to standards set by APVMA or SAFEMEAT and subsequent related questions in NVDs are correct and that livestock are fit for purpose. We will not be able to sign off on these declarations with confidence if we are operating in an environment polluted by an industrial incinerator located at Woodlawn up wind from us. When Veolia cannot guarantee 100% there will not be contamination from the Woodlawn incinerator that will impact our business, how can we assure our products comply with ever changing regulations and standards that are set by governing bodies?

Responsible Wool Standards and associated Accreditation Programs are increasingly being required for wool production to ensure that wool leaving the farm gate is compliant with description and can comply with processing criteria. We are required to sign a National Wool Declaration when marketing wool with our PIC. We have to guarantee that all the products that leave the farm are fit for purpose and comply with all the local and export market specifications as they evolve.

We have a social and legal responsibility to control what happens on farm but are not able to control what happens down wind or downstream of our business from operations carried out by other business owners who neglect their duty of care to the environment, neighbours and others in the local area.

The Collex Waste Management EIS dated February 1999 for the Woodlawn Bioreactor stated at 9.3.4 – Land fill Gas Odours. That the majority of odours would be collected in the LFG extraction and flare/ combustion process. In addition the nearest residence over 3 km away was not within the Denehurst property (Pylara) thus providing a large buffer zone and odours from the LFG should not impact on the surrounding area. 9.4 Safeguards stated “The potential impacts on air quality would be minimised or avoided completely through the design and implementation of an EMP ( Environmental Management Plan). Clearly totally incorrect statements given that, located 4km to the south west of the bioreactor, we have had 17 years of offensive odour since January 2005 from the facility and no sign of Veolia being able to adequately manage the facility to reduce/limit odour constantly experienced by the local community. Constant reporting and complaints of odour incidents over that time to both Veolia and the EPA have resulted in any significant change.

Veolia has a past track record of failing to comply with operational requirements and failing to comply with reporting requirements. Failing to resolve the odour issue over 17 years. We do not believe that Veolia is capable of complying with operational guidelines and regulatory requirements for the Advanced Recovery Centre now or in the future. Veolia has taken a reactive approach in its management of odour from the bioreactor facility and other environmental issues in the past rather

than a responsible proactive approach. We believe that a similar approach will be taken by Veolia in regard to the operations of the incinerator.

With the past history of Veolia and their performance we believe that the EIS as released for the Advanced Energy Recovery Centre is likely to be highly conservative and inaccurate in relation to predictions for the adverse impact its proposed incinerator operation will have on the local rural community and farming environment.

There are some basic factual errors in the EIS which are misleading. Table 8.1 Air Quality Assessment Locations shows only about 20 locations as Agricultural and the others as residential. Fact is that all of those listed as residential are also Agricultural and active farming businesses Table 8.4 is likewise misrepresentative in not giving a true and accurate picture of the local agricultural and business environment surrounding Woodlawn. Figure 8.18 Willeroo Bore Fields and Third Party Bores is also inaccurate, bore GW035662 does not exist in the location shown on our property. What other minor or major errors and omissions have been made in the EIS as released? How can the EIS as released be a valid document if it is not accurate in all its content?

Section 8.17.3 Waste treatment, storage. In listing the waste that the incinerator will generate, APC is shown. This is the fly ash and filter bag residues that will be generated to an amount of 15,200 tonnes per year. At the time of releasing the EIS "no characteristics of this toxic waste are known". As this is the case how can Veolia accurately predict what air borne pollutant emissions will be? The EIS states this APC will be stored while testing determines its composition. Veolia is unable to state how the APC toxic waste will be treated. The high variability of the waste stream will greatly influence the emissions and waste produced by the incinerator. This is a completely unknown aspect of the project based on no clear facts and a lot of assumptions and guess work. Totally unacceptable.

Sections of the EIS admit, even though stated to be minor show that there will be emissions from the incinerator.

Air quality and odour- Potential Impacts 8.1.3 start-up/shut down, Fig 8.5 – air quality impacts are minor at surrounding sensitive assessment locations. Regardless of the locations considered sensitivity, no impact is acceptable at any location.

Appendix EE, at 29 Flue Gas Treatment- process deviation- potential "to exceed emission limits." Such an event is totally unacceptable at any time.

Biodiversity 8.10 Table 8.40 "The project may result in minor impact of water quality downstream." No impact downstream is acceptable for the sustained ecology of Crisps Creek, Mulwaree Ponds, Mulwaree River and subsequently the quality of Sydney's water supply and other industry and business users along the way.

Appendix O Air quality Impact.

The background for this was based on monitoring stations at Goulburn, Canberra and Bargo all of which would experience elevated levels of urban pollutants. All three locations above are not close to Woodlawn and immediate surrounds which is further ways from urban pollutants than the above monitoring stations. Resulting data is not relevant to Woodlawns location or this EIS.

### Waste treatment Storage 8.17.3 Encapsulation Cell.

The watershed for the Wollondilly River and Lake George Catchment pass through the Woodlawn location.

15,200 tons per year of highly toxic waste of is to be located at the top of Crisps Creek the start of the Wollondilly River, next to the Tarago Road. There is no 100% guarantee from Veolia that there will be no spread of this highly toxic waste from run off , dust and seepage in the short term and long term to neighbouring properties and initially Crisps Creek. This in not acceptable.

Emissions by air and water from the incinerator put human health at risk in the local area.

There is no council water supply to any of those residences/ agricultural locations shown in Table 8.12 and Table 8.4. We all rely on fresh rainwater collected and stored from roofs for all aspects households' daily use and gardens. Air borne toxins that will come from the incinerator are not currently present in the environment and do not currently contaminate household water supplies.

Home grown produce from gardens and orchards supply households with vital fresh vegetables and fruit, consumption of otherwise fresh and healthy produce will put human health at risk due to wind bourn pollutants from the incinerator.

Free range poultry will pass on consumed incinerator pollutants in their eggs, a risk for human health and the poultry.

Local bee hive working in the area will collect pollutants from the incinerator that are not currently present in the environment. The health of hives will be compromised and honey extracted will be contaminated with elevated levels of toxins and not fit for human consumption. Honey has scientifically been shown to be an accurate indicator of environmental health.

Wool from sheep will carry contaminants not seen in the past from the incinerator facility and subsequently not be acceptable to fit the wool market and processing specifications. Our livestock downwind of the facility will be eating pastures contaminated with toxins from the incinerator and cause health problems for them and subsequent meat contamination. Crops grown downwind will be contaminated with air borne contaminants and unsaleable not fit for purpose.

With products and produce rendered not fit for purpose due to off farm uncontrolled polluting sources at the Woodlawn incinerator facility the result will be forced business closure through no fault of our own. All farming businesses in the surrounding area will be faced with the same situation due to a neglected duty of care from activities outside of their control. Local businesses that service effected primary producers will be adversely impacted.

Land Values in the area around Woodlawn have already been adversely impacted by the odour from the facility, to the extent that you need to pick a day for property inspection when you are not downwind of the Bioreactor and odour. Country air should not be offensive. A valuation we had on the property a few years back indicated that proximity to the Woodlawn bioreactor would not assist in the sale of the property and an industrial incinerator will further adversely impact sale prospects and values of all local property.

The local roads servicing Woodlawn were never intended or constructed to carry the huge volumes of heavy traffic that convey waste to Woodlawn now from Canberra, Goulburn and beyond. Even before the current adverse wet weather conditions local roads were falling apart to the extent that councils are unable to maintain the roads in a safe condition for all road users. Lives are at risk every day on these roads with all vehicles big and small constantly trying to avoid tyre/rim breaking pot holes. Veolia claims to be contributing funds for road maintenance but it would appear that it is either not enough or not being spent in the right locations.

The EIS indicates that Flora and Fauna assessments were carried out in close to site proposed for the incinerator however none were conducted for areas in the proximity where there is a greater number of native species of both flora and fauna including Koala populations. Even minor impacts as Veolia predicts and those that exceed the emission limits from the incinerator, will have adverse impacts on fragile ecosystems and flora and fauna in their as yet unspoilt natural habitat. This is not acceptable.

We have seen since the first 1999 EIS for the Woodlawns Bioreactor, which was going to be for putrescible and EPA approved waste and 1 train load a day, that the reality today is hugely different, with 2 train loads a day plus local waste. Woodlawn was the site for the disposal houses demolished after the 2019/2020 bushfires and receives commercial waste. The current EIS for the Advanced Energy Recovery Centre is only relevant to today in what it states. The reality further on, will be vastly different as it evolves and what are seen as minor environmental impacts now, will become major and irreversible damaging environmental impacts in the near future.

The bottom line is that Veolia in the EIS already acknowledges there will be impacts to the environment from the incinerator, they call them minor. Past history has shown Veolia has no credibility and cannot be trusted. There should have been zero odour impacts from the Bioreactor at Woodlawn from the start in 2004, as the Collex EIS stated.

Toxic emissions from the incinerator that will enter the local environment and food chains of fauna, flora, humans, livestock in the local area are there for all time and will have major ramifications, environmental, social and financial for all involved at all levels of society and government.

We as farmers have to guarantee our products fit for purpose to stay in business, Veolia should be no different.

Veolia's application for the development of an Advanced Energy Recovery Centre (incinerator) at Woodlawn Tarago must be rejected, based on Veolia's past performance record, the release of an incomplete and inaccurate EIS and in the interests of the future sustainability of the environment and local community.

**Declaration statement.**

We BH & RJ Fairfax have read and agree to the Departments disclaimer and declaration terms and conditions.

BH Fairfax B. H. Fairfax

RJ Fairfax R. J. Fairfax

# Political Donations Disclosure Statement to Minister or the Director-General

If you are required under section 147(3) of the Environmental Planning and Assessment Act 1979 to disclose any political donations (see Page 1 for details), please fill in this form and sign below.

<b>Disclosure statement details</b>				
Name of person making this disclosure <i>Barbara &amp; Richard Fairfax</i>		Planning application reference (e.g. DA number, planning application title or reference, property address or other description) <i>DA No - SSD-21184278</i> <i>Woodlawn Advanced Energy Recovery Centre</i>		
Your interest in the planning application (circle relevant option below)				
You are the APPLICANT      YES / <b>NO</b>		OR      You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION <b>YES</b> / NO		
<b>Reportable political donations made by person making this declaration or by other relevant persons</b>				
<p>* State below any reportable political donations you have made over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).</p> <p>* If you are the applicant of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</p> <p>* If you are a person making a submission in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.</p>				
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By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.				
Signature(s) and Date				
<div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">               Name(s) <i>Barbara Fairfax</i> </div> <div style="text-align: center;">               Name(s) <i>RICHARD FAIRFAX</i> </div> </div>				