My name is Mary Jane Ahern and I live at 12 Wormboo Street, Ravenshoe 4888]. I strongly object to Veolia's proposed incinerator being built in Tarago.

Submission in relation to Woodlawn ARC: SSD-21184278

I believe that Veolia's toxic industrial waste incinerator for the following reasons:

It simply is not necessary

There is sufficient capacity already in the existing Woodlawn landfill which has a remaining useful life of 25 years and captures methane emissions to generate enough power to supply electricity to the grid.

This incinerator will contribute to climate change by emitting 140,000 tonnes of greenhouse gases (CO2) each year. To approve the project is inconsistent with the NSW government commitment to Net 0 emissions by 2030.

It is toxic to our health and environment

Veolia's incinerator proposal will emit toxic air pollution 24 hours a day, 365 days a year for 25 years, which will spread throughout the region from Canberra to Goulburn, Braidwood, Bungendore, Murrumbateman, Gunning, Marulan, Yass and more.

Food contaminated by incinerator toxins can cause cancer, miscarriage, infant deaths, developmental delays, reproductive issues, heart disease and respiratory impairment. This is not acceptable to be placing a facility like this close to human inhabitation.

Pollution from the proposed incinerator will includes acid gases, toxic heavy metal particulates as well as dioxins, furans, PCBs, and PFAS. Particulate pollution can lead to decreased lung function, cardiac disease and death. In addition to polluting the air, dioxins and furans will accumulate in the surrounding environment over time in soil and water and are absorbed by plants, crops and animals.

The proposal 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 track record of polluting local ground water proves they cannot be trusted to safely manage such toxic outputs.

This incinerator will impact the health of our children, grandchildren and their grandchildren through the accumulation of forever chemicals in the surrounding environment. It is an intergenerational burden and legacy which cannot be allowed to go ahead.

The NSW Government acknowledges in its own Energy from Waste Infrastructure Plan that waste incinerators impact human health stating: "*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*".

In 2019, academics from the Australian National University Medical School, the Public Health Association of Australia, and Council of Academic Public Health Institutions Australia completed a systematic review of the health impacts of waste incineration, which was published in the Australian and New Zealand Journal of Public Health in 20202 and referenced by the NSW Government Chief Scientist and Engineer in his report to the NSW Minister for Environment that same year. This report concluded that **"there is insufficient evidence to conclude that any incinerator is safe"** and in particular **"contamination of food and ingestion of pollutants is a significant risk pathway for both nearby and distant residents"**.

The proposal has already caused significant detrimental negative impact to surrounding communities' mental health by increasing anxiety and depression. This will only be increased if the project goes ahead as those living nearby continue to stress about when their health will start to show the impacts of the pollution from the facility, or having to stay indoors.

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 and Veolia has a track record locally for failing to comply with license conditions at their existing Woodlawn facility.

It will be bad for children

In July 2018, the Eastern Creek waste incinerator in Sydney was rejected by the NSW Independent Planning Commission as not being in the public interest. The reasons included concerns about safety, insufficient evidence that the pollution control technologies 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. Since then, the NSW Government has banned toxic waste incinerators in Sydney due to the risk to human health. The risks have not changed since that decision back in 2018 – this project must also be rejected - If they aren't safe for Sydney then they aren't safe for Tarago.

Waste incineration is not recycling and contributes to climate change

I do not agree with the characterisation of waste incineration as renewable energy generation, nor that it will reduce greenhouse emissions or reliance on fossil fuels. Unlike wind and solar generated power, waste doesn't come from infinite natural processes. It is sourced from finite resources – minerals, fossil fuels and forests that

are cut down at an unsustainable rate. Plastic is a petroleum by-product. Burning it is the same as burning fossil fuel and produces similar emissions.

Veolia's claims that incineration is better than landfill due to methane emissions is flawed as it ignores the fact that methane produced from their landfill is captured which prevents it from entering the atmosphere. They also utilise this to generate power which is pumped into the grid. This process is much better for the environment as it does not produce the CO2, air pollution and toxic ash by-products an incinerator does.

This incinerator will contribute to climate change by emitting 140,000 tonnes of greenhouse gases (CO2) each year. To approve the project is inconsistent with the NSW government commitment to Net 0 emissions by 2030.

Incinerators reduce recycling rates by destroying discarded products and creating a disincentive to local councils by locking them into long-term contracts requiring them to supply consistent volumes of waste for incineration over decades. They are incompatible with a circular economy – they replace one waste stream (municipal/commercial/industrial waste) with contaminated ash.

Adverse Economic impact

This project is in direct conflict with alternative development and growth in the local area. Maintenance of successful local agricultural businesses, along with increased growth in rural- residential developments expected over the next 10-20 years will sustainably increase the size and diversity of the local community, supporting local businesses, volunteer organisations such as the NSW RFS, CWA and local schools. In contrast this proposal would risk the viability of local agricultural businesses, reduce existing residential developments as families move away due to the health and environmental pollution, and put a halt to any further long-term local business development or growth in rural residential developments as the area.

It is clear there are limited economic benefits to the community from this project. Despite claims made by Veolia in the EIS, there are only a very small number of ongoing jobs created and required in order to manage and maintain the incinerator once constructed. Most of these workers will not reside in the local impacted community and would commute from either Goulburn, Bungendore or Canberra. The creation of this small number of jobs would in no way make up for the negative economic impact of reduced local population due to impacted families moving away, and halt to future growth which will result in pressure put on the viability of local businesses, schools and community organisations.

Employment rates in the local region are high – the jobs this project proposes aren't needed in the local economy and there simply aren't the people to fill them. It would likely both steal employees away from existing regional businesses struggling in the current economic environment and utilise significant numbers of fly-in fly-out (FIFO) employees who take and spend their money back home away from the local region.

There also simply isn't enough housing in the local area for these proposed workers – there are currently no vacant rental properties in Tarago, so any workers would be forced to surrounding towns again resulting in no economic benefit to the local area which is most impacted.

There are no requirements for jobs and growth in Goulburn Mulwaree to justify this proposal. The Department of Regional NSW has not listed this LGA as requiring significant investment, nor is it included in any of its Special Activation Precincts or Regional Job precincts. The unemployment rate in this region is lower than both the state and national unemployment rates.

No social license

The NSW Energy from Waste Policy states that incinerator proposals are only valid where "community acceptance to operate such a process has been obtained". There is no community acceptance for a facility in Tarago or anywhere in the Southern Tablelands.

Veolia have spent over 15 years failing to operate their existing Woodlawn facility within license conditions, have received multiple infringements, failed to inform the community of pollution to the environment, and attempted to withhold information from the community under freedom of information processes. Veolia's track record shows they break the rules, hide information from the community and pollute the environment. Because of all these reasons, Veolia do NOT have social license to operate this project.

I say NO to this dirty great incinerator . I declare that I have not made a reportable political donation in the last two years.

I acknowledge and accept the Department's disclaimer and declaration.

Yours faithfully

Mary Jane Ahern