

Re Application No SSD-21184278 Woodlawn Advanced Energy Recovery Centre.

Submission opposing the application.

Submitted by Mrs Margaret Cameron, Goulburn Branch Chair

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I declare that I have made no reportable political donations in the last 2 years.

Goulburn Branch NSW Farmers Association strongly oppose the proposal by Veolia to incinerate waste from Sydney and other areas at their Woodlawn site at Tarago.

We support Goulburn Mulwaree Council stated opposition

- Potential toxic chemical contamination coming from this site would severely threaten soil with toxin and heavy metal accumulation, pastures and water in the region, exposing plants, animals and humans to unsafe toxins.
- We do not trust the statements from Veolia that no, or very few toxins, would escape the site. So far Veolia has a poor track record of preventing odour and leaching from its existing operations.
- Agriculture in this area has a strong record of clean food and fibre production and any release of toxic gases or leachate from the site would severely impact this. It would reduce access to domestic and export markets which have very low levels of chemical residue tolerance for food safety,

meaning affected produce would potentially be unsaleable or at least the value would be significantly lowered.

- Ultimately toxic organic pollutants from this site causing chemical residues in exported food and fibre could threaten Australia's export markets as grain and hay unknowingly contaminated from this area could be consumed elsewhere by animals destined for meat export. Likewise livestock from here may be sold to other areas and then enter the food chain at a later date. It would be difficult to perhaps identify the source of contamination.
- Grain, hay, animals, eggs, poultry, wool, wine and horticulture are produced in the area and sold locally, regionally and to export markets. These enterprises must be protected, together with the physical and mental health of those who produce them.
- If these contaminants escape then onto their land either air or water borne, Organic producers would immediately lose all accreditation meaning products even if they could be sold would be severely discounted.
- Potential leaching from the site, together with airborne pollutants washed into waterways would also adversely impact downstream irrigators and their produce. Sydney's population would maybe get some of their own waste back!!
- If the proposal were to be approved, then we should require that in the consent conditions, Veolia , at their expense set up independent monitoring sites in all directions at a number of distances [to be determined] from Woodlawn. These sites should have contaminant levels in soil , air and water recorded prior to any incineration as a baseline, then regular testing. If emissions are shown to be occurring, then

EPA should have the power to immediately close the operation down.

- Food and Fibre Safety must be a high priority in any development proposals and an incinerator such as this [noting they are banned in Sydney and the ACT] has no place in a food producing region. It must be banned here also and we commend Council in opposing this proposal.
- Governments are trying to get Sustainability Frameworks into operation, that will guide investment into sustainable agriculture and both open new markets and retain existing markets. Any threat to that, such as this proposal, is just not sensible as it is going against both the State and Commonwealth Governments aims for Agricultural integrity.
- The simple mathematics in the EIS are flawed. It states at the bottom p15 of the Executive Summary that it will divert 380,000T of waste from landfill, yet neglects to calculate the 76,000T of ash (IBA) that will be sent to landfill after 3 months of stockpiling. If Veolia cannot get simple mathematics right, how can we trust them on the science of emissions, odour and other issues which have to date been neglected at the current site.
- The graphs used in the EIS to demonstrate the predicted air pollution concentrations are skewed. The bushfire season of 2019/2020 will have significantly skewed the average of the data, leading to a favourable visualisation for the data presented. Another mathematical failure. NSW Farmers Goulburn Branch would like to see the data without the insertion of the skewed readings of 2019/20. We suggest it would be far less favourable for the project.
- P16 Exec Summary Pt iv Community states;

“It is noted there is also support for the project and its economic benefits and contributions to the community. Veolia has and will continue its community engagement program throughout all phases of the project.”

I am unsure where the support for this project is coming from, because it is certainly not coming from the community, Local Govt, or the state member!

- The EIS states that there will be additional heavy vehicle movements associated with the delivery of ancillary supplies, such as Hydrated Lime and Anhydrous Ammonia.

Given the current dilapidated state of the roads into and out of the Intermodal facility and the Woodlawn Eco Precinct, there seems to be no recognition of the poor state of the roads, nor the impacts that the extra vehicles will have on them. We do not accept that such an increase in the volume of traffic and type of traffic will not have any effect on the road surfaces at all. Veolia should be made to contribute section 94 contributions to the improvement of the roads associated with the IMF and the Eco precinct.

- Moreover, the NSW Farmers Association has policy that seeks that

“no high temperature incinerator be located anywhere in pastoral, agricultural or inhabited land in Australia until the EIS process being undertaken has shown that high temperature incineration is the best available technology and that it imposes no environmental hazards.” The current EIS does not satisfy either of these two criteria.

We strongly reject the proposal, and support Goulburn Mulwaree Council and the community in opposing the Application.