

13th December 2022

Director – Industry Assessments  
Development Assessment  
Department of Planning, Industry and Environment  
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To whom it may concern,

**Proposed Veolia Woodlawn Advanced Energy Recovery Centre (SSD-21184278)**

I am writing, in my capacity as Secretary of the Bungonia Progress Association, regarding the EIS submitted to the Department of Planning, Industry and Environment (DPIE) for the aforementioned SSD.

The Bungonia Progress Association (BPA), established in 1901, is a grassroots association, representing the Bungonia community, and has had, since inception, the objective of the general advancement of Bungonia and District as its remit.

The membership of BPA object to the application and have genuine and significant concerns regarding this proposal and are doing everything it can to represent the views of the community to ensure this project never reaches fruition.

BPA is fundamentally opposed to this proposed State Significant Development. The community of Bungonia first and foremost does not consider this project as beneficial to the community and does not consider that Veolia will ever be in a position to sufficiently demonstrate genuine long-term benefit to the community, environment, or local economy.

There are numerous factors that give rise to this position which are summarised below.

Further to this BPA is gravely concerned about the process undertaken to date, the lack of transparency in relation to matters critical to the community's health and wellbeing across all facets of our way of life, and the inadequacy of time provided to allow the community to review the details provided in the EIS.

## 1. Water and Wastewater

The prospect for this development to contaminate the groundwater supply both via wastewater generated by the facility over time and during the construction of the facility, as well as via emissions from the incineration process impacting all tank water in the area and well beyond is exceptionally high.

As groundwater and tank water are the ONLY two (2) sources of water accessible in the area (with households on tank water for drinking water and household use) there is a dramatic deficiency of any protections from this significant threat to our health and wellbeing, our agricultural livelihood, the natural environment, and the long-term viability of the area.

There are also implications for Greater Sydney, with Crisps Creek (that runs through the proposed site) and the Shoalhaven catchment areas being part of the Sydney water catchment area. As such, Sydney's water quality could also be compromised. An important and far-reaching consideration.

Veolia has been in numerous breaches of groundwater contamination from its existing facilities at Woodlawn, the most recent in November 2022 ([Multinational waste giant Veolia admits to another breach at Tarago's Woodlawn site | Goulburn Post | Goulburn, NSW](#)). This proves that Veolia is not competent to manage groundwater contamination appropriately, let alone a hazardous waste encapsulation cell as proposed in the EIS (Appendix F: Woodlawn Encapsulation Cell Design) for toxic filter ash residue referred to as APCr.

## 2. Disaster Management

BPA considers that it is essential that any assessment of disaster management not only focus on natural disasters but also on any minor or catastrophic events impacting the facility. As the area is prone to bushfires this should be a major focus of assessment, particularly in relation to impact on operations, so that DPIE is presented with reliable material to evaluate.

A glaring omission in this regard is the fact that no Emergency Response Plan was put forward as part of the EIS, and only a recommendation that one be developed (Appendix FF: Fire Safety Study). Furthermore, the consultant 'Riskcon' concluded that "should the protection systems be located per the recommendations of their report, the services should be capable of combating the modelled fire scenarios". Should is not sufficient assurance to local residences.

## 3. Transmission Line

BPA is very sceptical as to any value this might bring to the operation of the local grid and considers that the proposer should provide explicit documentation from Essential Energy (or similar energy provider) as to the value of the supply to be fed back into the grid together with a detailed assessment of the operational impact of blackouts and brownouts, both common to the area.

## 4. Air Quality Impacts

Air quality is one of the foremost concerns in the community. This concern includes impact on health and wellbeing, visible pollution in the area, and toxic substances, being both in the local atmosphere and subsequently falling to the ground damaging vegetation, both natural and agricultural, and likewise reducing soil quality both short and long term.

BPA is confident that both the nature of the operations, being incineration of waste, and the emissions from the stack will affect a large portion of the LGA. The emissions produced by the proposed project over its lifetime are significant and these will have serious ramifications to the health of the residence of Tarago and most importantly to the students of the Tarago pre and primary schools.

## **5. Impacts on Human Health, Agriculture, and the Environment**

BPA has grave concerns regarding both assurance of water and air quality, and it goes without saying that any detrimental outcomes for these two key resources will have a catastrophic effect on human health, agriculture, and biodiversity / environment.

The community is anxious about the short, medium, and long-term impact of this proposed development on a wide variety of matters including but not limited to; physical and mental health of the local community, the long-term agricultural viability of their properties, vegetation and biodiversity, visual pollution, and the impact on places of significance such as the Shoalhaven catchment area and Lake George.

The health and wellbeing of all facets of community life is at significant risk. The proximity of the Tarago preschool and public school to the proposed facility, plus the additive effects of the new facility to the exist facilities emissions cannot be ignored. This has been the case since knowledge of this project came to light and the DPIE should be on notice that this will continue to be the status going forward.

## **6. Cumulative Impact**

BPA must stress that it is the cumulative impact of all aspects of this State Significant Development including but not limited to:

- Water and ground water quality.
- Air quality.
- Impact of waste including ash, water, residual Sydney waste.
- Degradation of the environment, including visual pollution.
- Adverse economic impact both on local industry and property value.
- Health and wellbeing of humans, animals, environment.

that must be collectively considered during the assessment process.

## **7. Community Consultation**

BPA must highlight that the community engagement to date has been limited. Veolia has not approached the BPA to address the communities concerns even though the community of Bungonia will be affected by the emissions from this proposal.

Furthermore, the BPA considers that the true social impact on Property and land use is not the alleged loss of agricultural land but rather the loss in value of the surrounding agricultural land and the detrimental impact of this facility on the vegetation, biodiversity, and environment.

BPA considers that this is disingenuous and is likely to ensue in skewing the results and alleged benefits of this proposal rendering the entire assessment process meaningless and ultimately not reporting the true social impact of the development on not only Bungonia, but on Tarago, Windellama, Collector and surrounding areas.

It should be noted that the BPA has had the benefit of consulting with both the Southern Highlands Progress Association (SHPA) and the Windellama Progress Association (WPA) and agree with and endorse their submissions as to why this proposal is not in the interest of the local community and therefore must be refused.

The BPA does not have any reportable political donations in the last two years to declare and that the BPA acknowledges and accepts the Department's disclaimer and declaration as required under the Departments submissions policy.

Please do not hesitate to advise should you have any questions or require further information and BPA looks forward to your favourable reply.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'J. Neumann', written in a cursive style.

Jenni Neumann  
**Secretary**  
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