Submission regarding the Woodlawn ARC: SSD-21184278

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I object intensely to the Sydney rubbish incinerator proposed at the old Woodlawn Mine at Tarago.

The proposal is to burn a large proportion of the city of Sydney's (and the rubbish of other nearby communities) "waste" to generate electricity. Canberra and other nearby jurisdictions are increasingly sending their "waste" to the Veolia site, especially since Veolia's takeover of Suez.

Sydney should be dealing with its own "waste" within Sydney. The same goes for Canberra and anywhere else.

This will quickly bring on some serious reimagination of what is really waste, and what could be reused, or at worst recycled.

If a substance is toxic, or cannot be reused or recycled, then it should not be produced in the first place, and should not be sold in our country.

Long term financial risk for the Government:

The Veolia company is locking itself into a long term government contract. Similar to the "investor state dispute settlement" (ISDS) shenanigans in free trade agreements, these contracts almost always include compensation for lost profits if the plant is closed early. We have no way of knowing if this type of clause will be included in contractual agreements or not.

The expected life of the plant is 20 years. What will happen if, in 3 years it is found that airborne particulates from the plant have been polluting the major watersheds in close proximity?

- Tarago township reliant on rainwater tanks for all water, including drinking water. Very close to the plant.
- Lake George bungendore town's sole drinking water aquifer
- Lachlan river headwaters of the Murray River all the way to the Coorong, through the heart of Australias bread basket. Sole water supply for many communities.

- Mulwarree River headwaters of the Hawkesbury Nepean system, Sydneys water supply
- Shoalhaven River Sydneys water supply, and all the way to Nowra, and the nearby ocean
- The Yass River catchment headwaters of the Murrumbidgee, then the Murray River all the way to the Coorong, through the heart of Australias bread basket. Sole water supply for many communities.

This is no small beer. If the plant follows the way of all previous technology, and breakdowns occur, there will be serious pollution events. The toxins released by these events will not dissipate on a timescale relevant to human lives - they will concentrate in the fatty tissues of the apex predators - Humans.

If human health is taken seriously, the plant will be closed early. If not, it will continue.

If the plant is shut down early then in all likelihood, Veolia will be compensated in an astronomical fashion by the NSW State Government who will be contractually liable for all of Veolia's potential future profits.

If the plant is not shut down early (the cost of this would be prohibitive in the likely contractual arrangements), the vast bulk of Sydney's water supply, the Lachlan, the lower Murray river system, the lower Murrumbidgee, Lake George and Bungendore, and the Shoalhaven River will be polluted into the future.

Design for disaster:

It is extremely important to plan ahead for the worst scenario.

The worst scenarios for this proposal are indeed extreme.

Many communities downstream from this site are the same that produce much of our food, and a large amount of exported food. Poisoning ourselves, or our finicky overseas customers so we can ignore and shirk responsibility for Sydney's waste stream is counterproductive, to say the least.

Double standards:

At present, free range egg suppliers are not allowed to have flocks over 100 hens near a tributary to the Shoalhaven river because it is a Sydney water supply. This was one of the reasons that Caroola Farm was sold. Presumably the same is true for the Hawkesbury-Nepean river system, as it too is a sydney water supply.

There is a clear double standard present when burning tens of thousands of tons of plastic and god knows what else is treated less seriously than the poo of 100 travelling chickens.

The difference in the degree of pollution produced by these two enterprises is absolute.

Food production:

This is a farming area. The incinerator will inevitably, over time, cover the entire area with toxic particulates, some of which - like Chlorinated Dioxins - can affect peoples health in the parts per billion, have no safe level, and accumulate in the environment, concentrating in the top predators - Human Beings.

Organic farms in the region are routinely tested, and are struck off the organic list if toxins are found. Will Veol; ia be compensating farmers for loss of certification, should this occur?

Poor track record of Veolia:

I have friends in Tarago, and the current Veolia operation is out of control, with incredible, thick miasmas floating over the town on a regular basis, making it an extremely bad neighbor. There are many diaries of this pollution made by locals going back 10 years. If Veolia cannot even manage the current operation to standards, how can it be expected to manage a much more dangerous facility, capable of producing the most toxic substances known to mankind - Chlorinated Dioxins?

Waste:

Waste is bad management. There is really no excuse for this behaviour.

The old milk bottle distribution schemes not only created a whole sphere of employment, but also re-used the bottles many times which saved oodles of energy with each re-use. Now we remanufacture (recycle) the glass bottle each time it is used. Or bury it, or chuck it in a gigantic incinerator with a bunch of plastic.

Backyard incinerators have been banned for many years due to their toxicity. While an industrial incinerator such as the proposed Veolia site at Tarago burns at a much higher temperature while it is running at full steam,

- what happens when it is starting up, or is shutting down? It is inevitable that a large amount of materials will be burnt at undesirable temperatures while these processes occur.
- What happens to the intensely concentrated toxins in the ash which remains after the burning? This stuff is second only to nuclear waste.
- What happens when the incinerator is cleaned?
- What happens to contaminated water runoff from the site?

Do the standards for incinerators measure these things? Why not?

We are dealing with the most toxic substances known to science, to be released on the communities of Tarago at ground zero, then within a radius of many tens of kilometers, depending on weather conditions. This includes the communities of Bungendore, Goulburn, Canberra, Queanbeyan and through the Shoalhaven and Mulwarree river systems into the bulk of Sydneys water supply.

Why do this at all?

Many overseas jurisdictions separate their outputs at the source. This creates several unmixed or "clean" streams of materials, which are valuable inputs for remanufacture. The separation is done by households and businesses, saving the taxpayer immensely.

The linear, or "dead end" economy must be replaced with a circular economy which works inside natural systems, rather than depleting them. Our only source of life's essentials comes from these natural systems we systematically destroy at an industrial scale.

It is a foolish idea indeed to be burning plastics, or burning compostables, or burning reusable or remanufacturable (recyclable) materials.

Carbon Release:

Plastic is a means of keeping carbon out of the atmosphere - unless we burn it.

How does the energy produced by this 30MW plant stack up against the collection, sorting, compacting and transport to Tarago? To this we could add the energy to manufacture the goods in the first place.

Why can't Sydney separate their "waste" at source?

A very weak solution:

This proposal makes no sense on the grounds of:

- Energy returned on energy invested (EROEI)
- Finance
- Ecology
- Water security

- Food security
- Export security

The only sense that can be made from this proposal is the desire to stick our collective heads in the sand and ignore reality. Veolia is providing us with a functional - and very expensive - means for us to achieve this end.

If this is the best we can do, we will deserve our fate. Our children, however will never deserve that fate, and it is they who will inherit the results of our stupidity.

I will be doing all that I can to make sure this project does not get built, and if it does, to ensure it is shut down as soon as possible.

I have never made a political donation to anyone.

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

Scotty Foster