

Communities Against the Tarago Incinerator (CATTI)

Formal Objection to the proposed Veolia Woodlawn
Advanced Energy Recovery Centre (ARC)



Artwork by Kaylani Boyd (Age10)
of Lake Bathurst, 5km from the proposed incinerator



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Veolia Woodlawn Advanced Energy Recovery Centre

Acknowledgment of Country

“We would like to show our respects and acknowledge the Ngunnawal, Gundungurra, Pejar, and Ngambri people who are the Traditional Custodians of the lands on which our community group comes together from, and to Elders past and present”.

Introduction

This submission presents CATTI's grounds for objecting to Veolia's proposed State Significant Development application SSD-21184278 – construction and operation of a waste to energy (WTE) incinerator with a capacity to burn 380,000 tonnes per annum of municipal solid waste and commercial & industrial waste and generate approximately 30MW of electrical energy.

CATTI's objection recognises consistent public opposition to this WTE incinerator proposal over the last 21 months which has included community petitions to the NSW Legislative Assembly (2,525 signatures) and ACT Legislative Assembly (919 signatures). The community's position has also been reflected in formal objections and public opposition from Goulburn Mulwaree Council, surrounding Local Councils, local state and federal MPs as well as members of the ACT government.

By the NSW Government's own admission, WTE incinerators are harmful to human health and the environment, even when emission levels are below national standards.

In the interests of human health, the local agricultural economy, the environment and future generations, this proposal cannot be approved.

Who is CATTI

CATTI is a not-for-profit community-led organisation incorporated under the NSW Associations Incorporation Act 2009. We formed in 2021 to coordinate community opposition to Veolia's proposal to build a WTE incinerator near Tarago, in the NSW Southern Tablelands. The organisation is wholly staffed by volunteers who live in surrounding communities which would be directly impacted by Veolia's proposal.

CATTI stands for preserving the clean environment and rural character of Tarago and the Southern Tablelands and managing waste in a more sustainable manner through reuse, genuine recycling and transition to a truly circular economy.



We should not be Sydney's waste dumping ground.

What we Want

We want to provide our much-loved future generations with a healthy life and environment – one that is not degraded, impacted, or polluted by unsafe, unsustainable and regressive waste management.

We have as much right to protection from harmful toxins as the people in Sydney's suburbs or anywhere else in the state. We should not be Sydney's waste dumping ground!

We call on the NSW Government to reject this proposal in its entirety as not in the public interest.

Why we don't want a WTE Incinerator

This proposal constitutes a significant and unacceptable human health risk

The *NSW Energy from Waste Policy Statement* (Ref 1) makes the very clear and unambiguous statement that “clean air is fundamental to everyone's wellbeing: poor air quality can be particularly critical to the health of children and chronically ill and older people, as well as affecting the natural environment and amenity of communities”.

Peer reviewed science demonstrates WTE incineration is harmful to human health.

Emissions from the incinerator would include harmful pollutants such as acid gasses, heavy metal particulates (mercury, lead, cadmium) and persistent organic particulates (dioxins, furans, PCBs and PFAS). This pollution can cause illness and death from respiratory problems (asthma, lung disease, breathing difficulties), strokes, cancer, heart disease, heart attack and more (Ref 2 and 3).

The communities surrounding this proposal are particularly vulnerable to these pollutants and harms via multiple pathways compared to the rest of the state given:

- The EIS Human Health Risk Assessment recognises the population surrounding the project site is more vulnerable to emissions given existing higher mortality rates from respiratory disease, high blood pressure and asthma in adults.
- The local community is already suffering negative health impacts from Veolia's existing Bioreactor operations and license breaches acknowledged by the NSW Environment Protection Agency (EPA) to include coughing, irritation of eyes, nose and throat, headaches, nausea and breathing difficulties (Ref 4).
- Total reliance on rainwater harvested from roofs as drinking water supply to residences - air pollution emissions and toxins will land on roofs and wash into water tanks.
- Accumulation of toxins from incinerator emissions in the soil and local water which will be absorbed by and contaminate home-grown produce, eggs, honey and meat from the predominately rural-residential properties in the locality.

The NSW Government Acknowledges the Science

The NSW Government recognises the threat WTE incineration poses to human health in the *Energy from Waste Infrastructure Plan 2021* (Ref 5):

“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. It is becoming challenging to comply with the national standards in NSW due to the growing population, tighter national air quality standards and the impacts of climate change. From a population health perspective, even where pollution levels are held constant, health impacts from air pollution are likely to increase over time, simply due to an increase in the number of people exposed due to population growth.” [Reference](#)

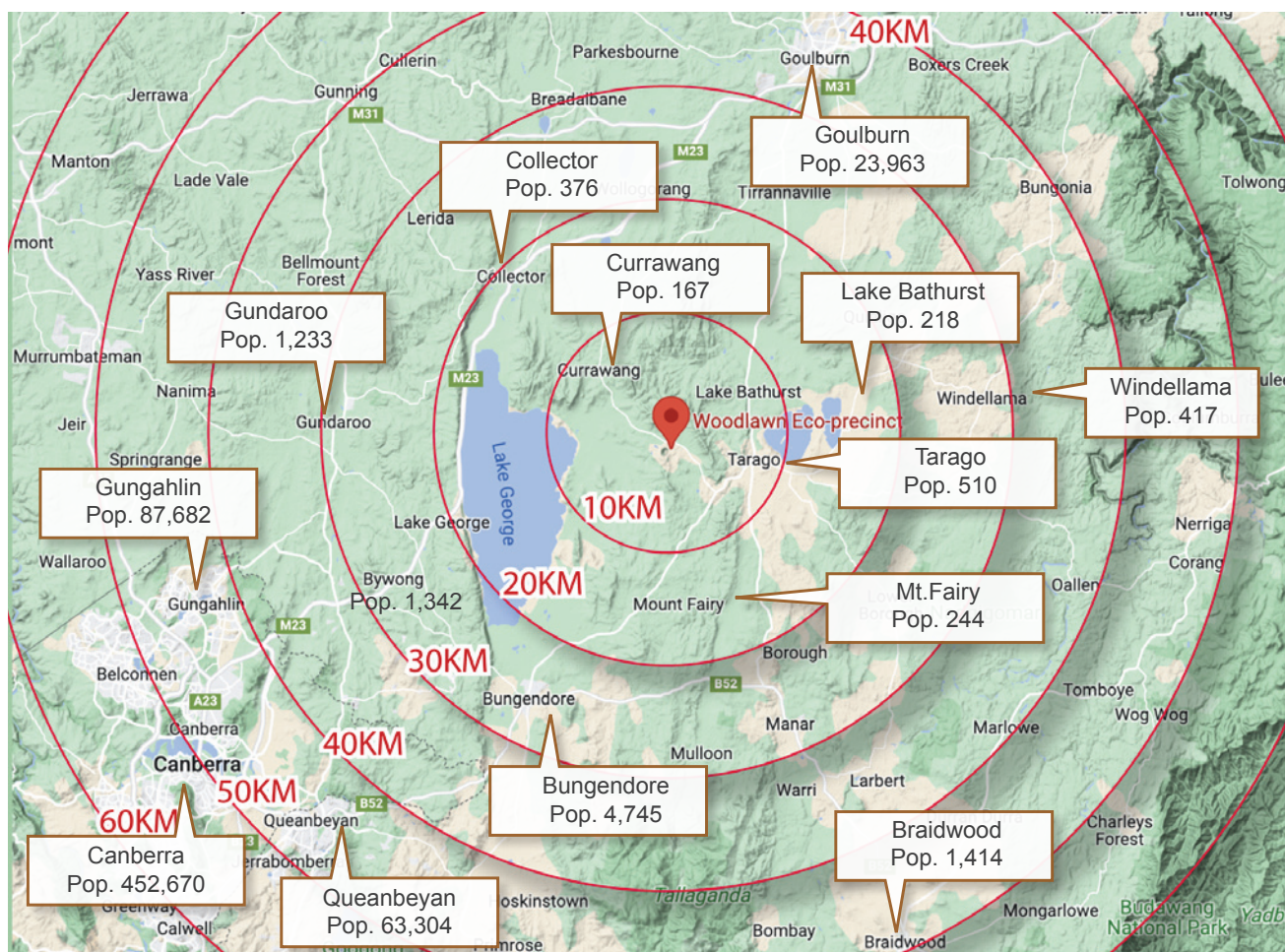
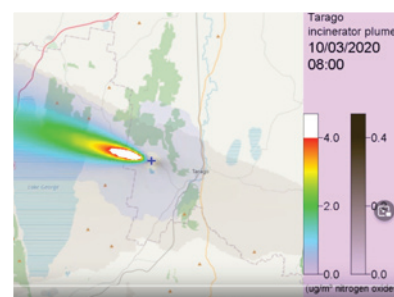
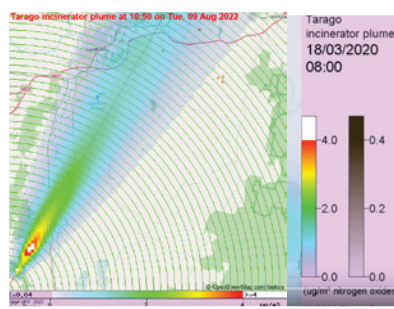
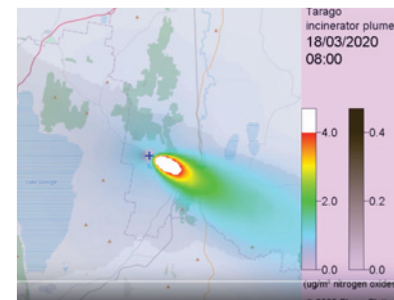
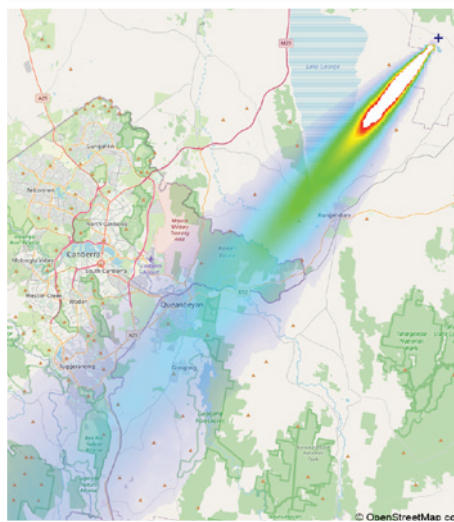
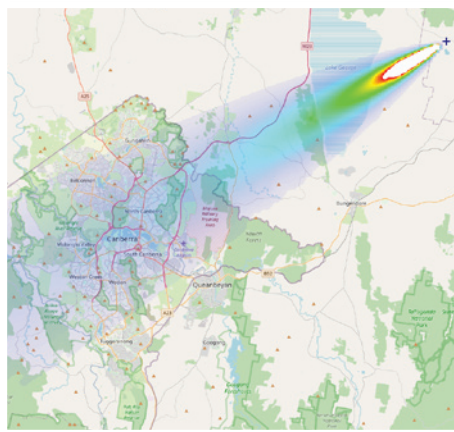
Academics from the Australian National University Medical School, the Public Health Association of Australia, and Council of Academic Public Health Institutions Australia completed a systematic review of the health impacts of waste incineration which was published in the Australian and New Zealand Journal of Public Health in 2020 (Ref 6) and referenced by the NSW Government Chief Scientist and Engineer in his report to the NSW Minister for Environment that same year. That report concluded:

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”.

Too Toxic for Sydney

The NSW Government's approach to WTE incineration is not to ban them, but to TRANSFER the known hazard to less densely populated regions in an attempt to subject fewer people to the hazard rather than poisoning many people in metropolitan and urban centres.

Approving the Veolia proposal will not achieve this aim of limiting the acknowledged impact to a smaller population. US EPA Air Quality Dispersion Modeling (AERMOD) based on data supplied by Veolia and local weather data from the Australian Bureau of Meteorology demonstrates up to 560,000 (ABS 2021) people from the NSW Southern Tablelands, Yass Valley and the ACT will be impacted by the WTE incineration emissions proposed for 25 years of operation.



Contributing to poor mental health

The mental health strain this proposal places on surrounding communities is equally significant and unacceptable. The World Health Organisation (Ref 7) defines health as “a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity” and further notes “there is no health without mental health”.

This proposal has already caused significant negative impact to the mental health of surrounding communities. These communities include large numbers of farmers who SafeWork NSW have identified as already more vulnerable to suicide and depression than the general population (Ref 24). Already suffering from strain and anguish caused by Veolia’s current operations and relationship with the community (see section: Veolia has proven to be a ‘bad neighbour’), over the past 18 months surrounding communities have been subject to additional sustained stresses causing increased depression and anxiety resulting from:

- Lack of procedural fairness and coherent explanation from the NSW Government as to why this region has been deemed an appropriate location to burn waste compared to other areas of the state.
- Lack of genuine communication from Veolia on the proposal and refusal to listen and acknowledge concerns over scientifically proven impacts.
- Disclaimers in the EIS Human Health Risk Assessment from the authors stating they assume no responsibility for inaccuracies or omissions.
- Memories from over 20 years ago when similar claims were made by Veolia and their consultants about no negative impact to the local community from the Bioreactor, which have been followed by 20 years of negative impacts and license breaches.
- Stress over how and when their physical health will start to show the impacts of pollution from the facility.
- Stress over what this proposal will mean for their farming businesses, income, livelihoods, property prices and family legacy.



This proposal constitutes a significant and unacceptable risk to the environment and will not support transition to a circular economy

Despite the green washing present in Veolia's brochures and promotional material – including their refusal to factually describe the project as a waste incinerator - WTE incineration is not clean, green, or genuine renewable energy generation.

It isn't clean

Incineration transforms garbage into more toxic forms of waste (Ref 2). Toxins emitted from the process accumulate in the soil, pollute our water and are absorbed by plants and vegetation. Animals, birds and insects then absorb these toxins (Ref 6, 8, 9). Landfill with methane-gas capture (currently at Tarago) is a much safer option for human health and the environment (Ref 10).

It isn't renewable

Incinerators are not renewable energy, they consume finite resources (e.g. plastics and diesel) as fuel (Ref 6) and discourage recycling (Ref 2). They also contribute to climate change by emitting more CO₂ per megawatt-hour than coal-fired, natural-gas fired, or oil-fired power plants (Ref 5).

It isn't green

WTE incineration is not listed as a renewable or green energy source in the NSW Electricity Infrastructure Roadmap (Ref 11), in fact it is specifically excluded from the National GreenPower Accreditation Program for renewable energy products (Ref 12).

The project would convert 380,000 tonnes of waste each year into 2 million tonnes of contaminated and toxic ash (fly and bottom ash), 85,777 tonnes of additional CO₂ greenhouse gas emissions (EIS Appendix Q – Greenhouse Gas Impact Assessment) and large volumes of acid gases, heavy metal particulates and persistent organic particulates. This excludes the additional emissions and pollution caused by the production and transport of chemicals used and stored onsite for pollution control, and production and transport of Portland cement for management of the hazardous fly ash.

No basis to claims in the EIS

Claims within the EIS of negligible impact to the surrounding environment are not supported by any evidence of baseline soil, water or air quality sampling conducted locally, within the region, or in the vicinity of the UK reference facility in Staffordshire.

Veolia's attempts in the EIS and other project documentation to justify the generation of additional greenhouse gases, emissions and toxic outputs by claiming the power produced by the incinerator would result in fewer emissions than a coal-fired power station would produce for the same amount of power are false and misleading. There are currently no coal-fired power stations in the Southern Tablelands region, nor is there any coal-fired power station in the state which will reduce power production as a direct result of this project.

Similar claims in the EIS that WTE incineration is preferable to landfill and that it would prevent harmful methane emissions are also false and deliberately misleading. This comparison ignores the fact that Veolia's existing Bioreactor landfill (where the waste would otherwise be disposed of) captures and harvests these methane emissions and converts them to energy via a BioEnergy plant, preventing their release into the atmosphere.



What about the circular economy?

The NSW Government states it is committed to making the transition to a circular economy by 2041 (Ref 13) which includes reuse, sharing, repair, refurbishment, remanufacturing and recycling to use resources efficiently and minimise the creation of waste, pollution and carbon emissions.

WTE incinerators do not form part of the circular economy. They exacerbate waste disposal problems because they do not eliminate waste, just replace it with pollution and toxic ash which must then be disposed of (Ref 2). WTE incineration also discourages the 3Rs (Reduce, Reuse, Recycle) by locking councils into long-term contracts compelling them to deliver a minimum quantity of waste for 20 to 30 years or pay fees to the incinerator operator for lost profits (Ref 14). This encourages continued generation of waste rather than reduction and increased diversion from waste to recycling.

It won't help NSW's waste problem

Veolia proudly communicated on their website, until only recently, that their existing Bioreactor harvested landfill is able to manage current waste volumes until at least 2047. Given this project is only seeking to maintain existing approved waste input volumes, this means all the negative and harmful impacts and outputs detailed above would be generated by this project while providing no additional waste management capacity in NSW for the life of the incinerator.

No evidence the incinerator will meet NSW standards

A key element of the NSW Chief Scientist and Engineer's advice to the NSW Minister for the Environment (Ref 20), the NSW Energy from Waste Policy Statement (Ref 1), and SEARs issued for this project is the requirement for Veolia to provide comprehensive details of an existing established reference facility using the same technology and feedstock in a similar jurisdiction to prove the proposal will meet all NSW technical, thermal efficiency, resource recovery and emissions standards.

This requirement has not been met. Veolia's EIS provides some limited data on operations of a facility in Staffordshire, UK for a single year only (likely their year of best performance). The EIS also makes a very clear conclusion in Annex L (i) – BAT Assessment that...

"potential reference plants are not currently available to benchmark against all the requirements of the NSW EfW Policy as the requirements on energy recovery facilities are different in other regions; notably, the Technical Requirements for emissions standards."

Veolia has failed to provide any conclusive evidence, by way reference facility, to demonstrate the proposal would meet NSW emissions standards or protect the long-term safety of public health and the environment.

This project constitutes an unacceptable cumulative impact to an already vulnerable and disadvantaged community

The project area already hosts a large number of State Significant Projects, including:

- Woodlawn Bioreactor
- Woodlawn Mechanical Biological Treatment (MBT) facility
- Woodlawn Solar Farm
- Develop Woodlawn Mine (zinc and copper)
- Woodlawn Wind Farm
- Capital Wind Farm

There are also a further seven additional State Significant Projects in the pipeline for the region, including more solar farms, quarries and mining projects (EIS Appendix CC – Social impact assessment).

Long history of impacts on the community

The town of Tarago and surrounding communities have been dealing with impacts from the Woodlawn site for almost 45 years. The zinc, lead and copper mine was opened in 1978 and operated up until 1998 before the proposal to turn it into a 'green energy' and landfill precinct. Those first 20 years of mining operations polluted the site and contaminated the town. We continue to live with the ongoing presence of lead contamination, exacerbated by construction of a railway siding for Veolia's operations during 2019-2020, directly impacting the long-term health of the community and young people (Ref 15). This contamination is yet to be remediated despite repeated promises to do so by the NSW Government.

When the Woodlawn site was approved as a landfill for waste from Sydney in 2004, the local community were promised it would be turned into an environmentally friendly power station, that the environment would be 'enhanced', and there would be no odour and no negative impacts on the surrounding community. Fast forward to 2022, and the local community have had to deal with more than a decade of license breaches, constant odour issues confirmed by the EPA as impacting health (Ref 4), and pollution of ground water and local water ways (Ref 16). All this while Veolia has managed to gain approval to more than double the tonnage of waste received each year and expand from municipal waste to accept building, construction and industrial waste including toxic and hazardous materials from asbestos to lead.

We've heard this before

The community of Tarago has been promised many times that major developments will not be detrimental and will instead bring many positive impacts to the region. These promises are contradicted by the ever increasing number of environmental issues emerging. In the past year alone, Veolia has contaminated ground water and local waterways, spilt contamination from leaking rubbish containers and received approximately 300 odour complaints for the existing operations.

The community and local environment have and continue to endure significant cumulative negative health and environmental harm from existing and historical projects. Adding a WTE incinerator which would spread toxic emissions across the surrounding region, generate over 2 million tonnes of additional CO2 greenhouse gas emissions, and create millions of tonnes of toxic ash waste is simply unacceptable and unconscionable.

Contempt for local community highlighted by 'NIMBY' label

Rather than acknowledge the ongoing harm caused by major projects and consequential community concerns, Veolia and their consultants have instead chosen to label locals as NIMBY, stating they have “a strong notion of ‘not in my backyard’ (NIMBY)” and “uphold a strong NIMBY sentiment” (EIS Appendix CC – Social Impact Assessment).

Commonly acknowledged as a negative and derogatory term to represent the narrow and selfish viewpoint of opponents to a development, Veolia's EIS disregards the very legitimate concerns raised by residents about cumulative impacts and harm caused by major projects, showing contempt for the local community whose lives are impacted.

The project will result in negative economic and social impacts to Tarago and the surrounding region.

Despite claims in the EIS that this proposal will deliver significant jobs, increased household income and benefits to local businesses, it is unclear how these would be achieved in reality and they are not balanced against the very real negative social and economic impacts the project would have on Tarago and the surrounding region.

The region immediately surrounding the project location consists of a growing village and hundreds of rural residential developments, as well as numerous potential future developments from sub-division. Given the locality's proximity to the large regional centre of Goulburn and short commutable distance to Canberra, there is significant expected further growth in rural residential developments over the next 20-30 years. Such rural developments increase the size and diversity of local communities, supporting their local businesses, volunteer organisations such as the Rural Fire Service, Country Women's Association, Men's Shed, Women's Shed and local schools. In contrast the development of a WTE incinerator would negatively impact property prices, reduce residential developments as impacted families move away, and put a halt to further development or growth in rural residential developments as the area is transformed into a landscape dominated by mining and waste management bringing the burden of air pollution, health impacts and large scale train/truck movements to local road.

The project will threaten more jobs than it creates

The EIS states that only 40 full time jobs will be generated by the project once constructed. It is unlikely the skills and experience required to fill these jobs exist within Tarago or the surrounding region and therefore will result in few job opportunities for those residing within the region. The meagre economic benefits these 40 jobs may bring are far outweighed by the negative economic impact of reduced local population due to families moving away and reduced residential growth which in turn will put pressure on the viability of local businesses, schools and community organisations.

Similarly, the additional labour required to build the WTE incinerator during construction will need to come from outside the region and at the cost of local businesses, who will need to compete with Veolia for staff in a tight labour market, negatively impacting the well-being of the existing local economy over the first three years. The significant number of fly-in fly-out (FIFO) employees during this period would take and spend their money back home, away from the local region.



It will make housing affordability and availability worse

The three year construction period would place significant strain on an already stressed local and regional housing market experiencing record low vacancy rates. There is a very real risk vulnerable community members would be priced out by the skilled construction workforce required, increasing financial hardship, housing instability and homelessness.

What about the farmers?

According to the 2021 Census, the combined agricultural production from the Goulburn Mulwaree and Queanbeyan Palerang Local Government Areas totalled \$172M. The project threatens the viability of this key local industry with potential air, water and soil pollution. Crops, pastures, and livestock contaminated by toxins accumulated in the soil and water may exceed safety limits for human and livestock consumption (Ref 17,18). Many overseas communities can no longer safely farm their land due to incinerator contamination. Acid gases such as nitrogen oxides (Nox) and sulfur dioxide (SO₂) cause acid rain which damages crops, lowers crop yields, reduces soil fertility and may kill vegetation (Ref 19).

The NSW Chief Scientist and Engineer advised the NSW Minister for Environment in November 2020 (Ref 20) of Australian health research which recommended avoiding placement of WTE incinerators in proximity to food production.

We must protect our prime agricultural land to ensure food safety for our future generations as well as the viability of this key regional industry.

Veolia has proven to be a 'bad neighbour' for over 20 years

The NSW Energy from Waste Policy Statement highlights the requirement for operators of a WTE incinerator to be 'good neighbours' (Ref 1). Given past behaviour is the best predictor of future behaviour, Tarago and surrounding communities have no faith in Veolia being able to meet this requirement.

Veolia have spent over 20 years failing to operate their existing Woodlawn facility within license conditions, 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.

EPA records demonstrate Veolia's non-compliance with licence conditions for 19 out of the 20 years of operating their Woodlawn Bioreactor since 2002 (Ref 29). In the last month alone Veolia have received a Penalty Notice (Ref 21) for breach of license due to offensive odours impacting the community, and a Prevention Notice (Ref 16) for ongoing mismanagement of leachate and pollution of ground water. Their Current Environmental Risk Level (Ref 22) has also been increased by the EPA in November 2022 recognising elevated risks to the environment from their day-to-day operations, performance and risk of pollution. This is on top of over 300 complaints lodged by the local community against Veolia in the last financial year.

Veolia are a text book example of a 'bad neighbour'



Records of community complaints about Veolia's current operations

While Veolia does not publicise complaint registers in a transparent, comprehensive, coherent, logical or easy to access manner, details of many hundreds of complaints made by the surrounding community since 2005 are available on various Complaints Registers below:

8/12/05 – 1/8/19

https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2019/08/Woodlawn%20Odour%20Complaints%20Register%20-54_20190815.pdf

22/5/18 – 10/5/21

https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2021/05/Woodlawn%20Bioreactor%20-%20Complaints%20Register_20210510.pdf

18/1/16 – 3/7/20

https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2020/07/Woodlawn%20Bioreactor%20-%20Complaints%20Register_20200703.pdf

14/10/21 – 28/10/21

<https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2021/11/Woodlawn%20Bioreactor%20-%20Complaints%20Register%20-%2020211029.pdf>

11/11/21 – 28/11/21

<https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2021/12/Woodlawn%20Bioreactor%20-%20Complaints%20Register%20-%2020211203.pdf>

30/11/21 – 21/12/21

https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2022/01/Eco-Precinct%20Complaints%20Register_20220117.pdf

10/1/22 – 10/2/22

https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2022/03/Eco-Precinct%20Complaints%20Register_20220216.pdf

18/4/22 – 18/5/22

https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2022/07/Eco-Precinct%20Complaints%20Register_20220520.pdf

24/8/22 – 5/9/22

https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2022/09/Woodlawn%20Eco-Precinct%20Complaints%20Register_20220914.pdf

No community acceptance to operate a WTE incinerator exists

The NSW Energy from Waste Policy Statement (Ref 1) makes clear in its introduction that social license is a requirement for WTE incineration projects, noting energy from waste is only a valid pathway for residual waste where “community acceptance to operate such a facility has been obtained”.

The community has shown through consistent overwhelming opposition that no such acceptance exists, and neither will it for the foreseeable future.

Social license is defined as the acceptance granted to a company by the community and is made up of three components (Ref 24):



Legitimacy – do they play by the rules?



Credibility – do they provide honest information?



Trust – can the community be confident that they will do what they say?

In addition to the scientific evidence of harm this project would cause to local community health and environment, any credibility and trust the local community afforded Veolia has been eroded over 20 years of license breaches, misleading information and false promises.

Veolia regularly breaches license conditions at their existing Woodlawn Bioreactor. They fail to meet reporting requirements, with the EPA describing their most recent Tarago landfill odour report as “not measurable, trackable or auditable” (Ref 25). They promised the Tarago community when they started their landfill it would not affect the town yet have received hundreds of complaints and multiple fines over the last 20 years. Veolia have also spent months blocking a community information request with the NSW EPA for details of operational infringements affecting the community (Ref 26).

Veolia’s track record demonstrates they break the rules, hide information from the community and pollute the environment.



License conditions will not protect the community from harm

In responding to Next Generation Pty Ltd's application to build a WTE incinerator at Eastern Creek in Western Sydney (Ref 23), the NSW Department of Planning stated "the Department also considers that any impacts from emissions cannot be appropriately dealt with by conditions of consent."

This position equally applies to Veolia's application to build a WTE incinerator in Tarago.

The lived experience of the Tarago community over the last two decades is that rules and license conditions do nothing to protect the community or prevent harm. Licence conditions imposed on Veolia by the EPA, compliance interventions and fines have had no effect on reducing negative impacts on Tarago and surrounding residents.

Absence of procedural fairness

The NSW Ombudsman defines the rules of procedural fairness as (Ref 27):

- Any person likely to be affected by a decision must be given notice of the issues in sufficient detail to be able to respond meaningfully.
- Any person likely to be affected by a decision or action must be given an opportunity to respond to adverse material, such as proposed adverse comment and/or recommendations.
- The people investigating an allegation, preparing a case or making a decision must act impartially in considering the matter.
- There must be some logically probative evidence to support conclusions, findings and recommendations – i.e. they need to be based on some logical proof or material evidence.
- Since the proposal to build a WTE incinerator was first made public, the NSW Government and Veolia have failed to provide procedural fairness to the Tarago and surrounding communities.

No consultation, notice or opportunity to respond

Despite clear and demonstrated public opposition from the local community, the NSW Government failed to undertake any consultation, provide any notice, opportunity to respond, or utilise any logical evidence when proclaiming and bringing into law via regulation, Southern Goulburn Mulwaree (Woodlawn, Tarago) as one of only four locations in NSW where construction of a WTE incinerator was permissible within the NSW Energy from Waste Infrastructure Plan (Ref 5).

Unfair advantage provided to Veolia

Over the last 18 months, ongoing collaboration the NSW Government and its representatives have had with Veolia throughout the process, including review and feedback on their EIS, contrasts with the lack of any meaningful consultation with the community.

This lack of procedural fairness is further evidenced by the short timeframe afforded the community to review, absorb, understand and respond to the complicated and technical 3,000 page EIS and restricted means by which community members were able to lodge submissions.

Despite representations from CATTI and the local state MP attesting to November being one of the busiest months of the year, poor internet access and connectivity in the region, slow postal services and lack of advertising and notice from the Department and Veolia, the Department refused to extend the public exhibition period beyond 6 weeks, made only a handful of hard copy EIS documents available to community members (none of which were available after hours or

able to be loaned or taken home) and restricted submissions to being lodged by mail (only if received by 6 December) and via the Department of Planning web portal.

These restrictions were further exacerbated by a planning portal outage of over 48 hours during the exhibition period where members of the community were unable to lodge submissions via the Department of Planning web portal and were requested to enter extremely personal details such as eye colour, marital status and ethnicity. After initial reluctance, following lobbying by both CATTI and the local state MP, the Department finally agreed to accept submissions via email and extend the exhibition period by an additional 7 days. However it is clear a number of community members were deterred from making a submission during this period, which wouldn't have occurred if procedural fairness had been provided in the first place.

The NSW Government and IPC must uphold precedent

Tarago and surrounding communities seek consistency from the NSW Government and note the precedent set by the NSW Planning Department assessment and IPC decision to reject SSD-6236 Eastern Creek Energy from Waste Facility application in 2018 (Ref 23).

In response to that application, as noted in the IPC statement of reasons, the Department of Planning stated the project:

- Does not promote the social and economic welfare of the community or a better environment;
- Is not consistent with the principles of ecologically sustainable development, in particular, the precautionary principle and intergenerational equity; and
- Does not promote the orderly and economic use and development of land.

The IPC supported the Department's conclusions finding that the project was not in the public interest because of uncertainty around:

- The project's impact on air quality due to the uncertainty around the project's emissions and the results of the applicant's predicted modelling;
- The project's impacts on human health;
- The suitability of the site; and
- The relationship between air quality impacts and water quality impacts.

The same lack of evidence and uncertainty around impacts to human health and environment and suitability of the site exists in Veolia's proposal and this precedent must be followed.

CATTI Comment on EIS Response to Key Issues in the SEARs

The below table provides a summary of CATTI's specific comments on the EIS response to Key Issues outlined in the SEARs. These identify numerous inaccuracies, inconsistencies, baseless assumptions, false and misleading information. Further detail on these points is provided in the Appendices to this submission.

Key Issues	EIS Section/Appendix	Comment
Statutory and Strategic Context/ Key Policies	EIS sections 2 and 5 Appendix J EIS sections 3, 8 and 6 Appendix J and L	<p>The Woodlawn ARC Environmental Impact Statement fails to meet the SEARs requirements for statutory and strategic consent because:</p> <ol style="list-style-type: none"> 1) it fails to justify the proposal meets the criteria for an energy-from-waste (electricity generation) facility with relevant permissions; and 2) it is inconsistent with the relevant planning strategies, plans and instruments, specifically the: <ol style="list-style-type: none"> a) NSW Energy from Waste Policy statement; b) NSW Energy from Waste Infrastructure Plan (2021); c) NSW Waste and Sustainable Materials Strategy 2041; d) NSW Electricity Infrastructure Roadmap; e) NSW South East and Tablelands Regional Plan; f) Goulburn Mulwaree Community Strategic Plan 2042; g) UN 2030 Sustainable Development Goals adopted by Australia; h) Australian Government's membership of the High Action Coalition to End Plastic Pollution; and i) European Industrial Emissions Directive (IED) Best Available Techniques conclusions (BAT-C). <p>The Best Available Technologies (BAT) assessment is not an objective assessment of all BATs. NSW EPA emissions policy differs from the European Industrial Emissions Directive (IED). This difference does not enable an effective comparison of BATs for purposes of assessing the Woodlawn Incinerator proposal against the BAT-C.</p> <ul style="list-style-type: none"> • BAT 1 is stated as compliant but most of the statements relate to future planning documents or decisions. There is no empirical basis to assess compliance. It is conjecture. It needs to be assessed against operational data that can only be collected IF the plant becomes operational. • BAT5 requires emissions to be monitored during OTNOC but the comment states this will not be the case. • BAT11 requires radioactivity detection on inputs yet this is not included in the comment for the design. • BAT12 does not mention anything about container storage on site, at Crisps Creek or Sydney. All storage locations must be included. • BAT19 repeats electricity generation. Does this BAT not look for other recovery besides electricity generation • BAT32 the explanation does not account for indicating this is N/A • BAT33 is not applicable as it is not using water from the process.

Suitability of the Site	EIS section 3	<ul style="list-style-type: none"> The EIS fails to adequately address Clause 2.19(2) of the State Environmental Planning Policy (Resources and Energy) 2021 in relation to the compatibility of the proposal with the existing adjacent Develop mine. Proper consideration is required to be demonstrated. No proper analysis of the site's compatibility with the neighbouring mine has been done.
Community and Stakeholder Engagement	EIS section 7 Appendix K	<ul style="list-style-type: none"> Veolia's Community Liaison Committee management demonstrates a pattern of community non-representation and in particular under-representation of the female community members most impacted by its ongoing operations. There are currently no community representatives remaining on the CLC. Veolia's community engagement did not provide a transparent, structured and meaningful engagement program for the local community and stakeholders. Veolia staged three online community information sessions to provide opportunities for the community and stakeholders to engage with EfW experts from the project team and discuss the ARC project in detail. Community members felt this was more marketing than a genuine desire to understand community concerns. The Community Liaison Committee reports that Veolia frequently fails to accurately represent community concerns in the meeting minutes. Feelings of community disempowerment are strengthened when reading the EIS and noting the extent of Veolia's collaboration with DPIE in contrast to lack of DPIE and Veolia engagement with the community and the GMC and QPRC local councils. The community at each and every event expressed the desire that Veolia, as the proponent, advocate for a longer exhibition time on behalf of the community. Whilst the community understands that the final responsibility for the exhibition timeframe sits with the Department, the community believe that had Veolia added their voice to the representation for a 3 month exhibition period, then that request was likely to be granted.
Air Quality and Odour	EIS section 8 Appendix O	<ul style="list-style-type: none"> The EIS air quality assessment is misleading. It disguises the fact that the EIS makes clear there will be an impact. The proposed facility will generate particulate matter and specific toxic compounds such as sulphur dioxide, ammonia, dioxins and furans into the local atmosphere, which are not currently emitted from the existing operations. These toxic compounds will continuously impact the population, which is not currently exposed to such emissions. The CALMET pollution plume modelling applied for the EIS does not factor in the prevailing wind patterns and topographical features. The CALMET study should have been run with the highest resolution Digital Elevation Model (DEM) available. The modelling does not apply the NSW EPA recommended grid spacing of 90 - 150m.

<p>Air Quality and Odour (continued)</p>	<p>EIS section 8 Appendix O</p>	<ul style="list-style-type: none"> • The pronounced valley-and-ridge topography of the region, the perpendicular trends of prevailing wind and topography, and the location of Tarago directly at the leeward side of one of the two substantial ridges. • The plume modelling using the coarser DEM grids results in an under-representation of the toxic pollution that would be imposed on Tarago other Southern Tablelands communities, Queanbeyan, the ACT and Yass Valley communities by the proposed WTE Incinerator. • The mixed feedstock for a Woodlawn incinerator, the interaction of prevailing eastward winds with pronounced N-S ridges leading to leeward side pollution accumulation. There are substantial dangers of toxic Persistent Organic Pollutants (POP) accumulating on agricultural land around Tarago and in Lake Bathurst. The population of Tarago and surroundings may not only accumulate POPs through constant breathing in, but may also further accumulate POPs through consumption of locally produced feedstock, fish, eggs and animals that may contain enhanced levels of POPs. • Woodlawn's altitude and hot summers aggravate incineration pollution effects. • The proposed incinerator at Woodlawn will be located at an altitude of 720 meters Above Sea Level (ASL) and will operate with a temperature range from -5°C to 40+°C. • The NSW EPA rejected the Eastern Creek incinerator, at an altitude of less than 50 meters ASL. • The incinerator, at an altitude of 720 meters ASL, would severely impact human health. • Burning Sydney's waste at 720m ASL compounds the impact of the hazard to the air quality of the Tarago, other Southern Highlands communities, Queanbeyan, the ACT and Yass Valley. • The Air Quality report obfuscates the actual distances from the site to major population centers such as Canberra and Goulburn. • Veolia's current operations are the subject of were the subject of over 300 complaints about odour last financial year and they have also received 5 Penalty Notices and 1 Prevention Notice for breach of license conditions since operating their current facility.
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Human Health Risk	EIS section 8 Appendix P	<ul style="list-style-type: none"> • The Human Health Risk Assessment fails to provide conclusive evidence to demonstrate long-term safety to the environment and public health. • The report makes clear that the air, water, soil, food and health of Tarago and surrounding areas will be impacted and worse off as a result of the incinerator. • Claims of 'negligible' or 'no significant' impacts are based on assumptions and modeling which are not supported by real life testing or sampling conducted in the Tarago area or the Staffordshire, UK Reference plant. • People will be continuously exposed to emissions of highly toxic Persistent Organic Pollutants (POPs) that will accumulate in soil and water ways. • POPs do not naturally break down. They accumulate in the body's fatty tissue. They are highly dangerous to human health. People's chemical sensitivity to pollutants and toxins can vary considerably. • Veolia minimises reference to the known risk to human health that this facility will pose to the community. The EIS report and NSW government policy acknowledges that the risk to human health from waste incineration is real and cannot be mitigated. • Veolia state that If health impacts were to occur due to stack emissions and air quality, the magnitude of these are anticipated to be moderate due to only affecting a small group of people. • This statement says to the community that Veolia considers sacrificing the physical and mental health of a small group of people is acceptable? • Does the NSW State government support this view that some NSW people are expendable? • Does the NSW government place less value on the physical and mental wellbeing of the people of Tarago and other communities who will be affected by this facility? • Do the children of Tarago and other communities not deserve the same opportunity to live free from the harmful effects of waste incineration? • The offensive odour from Veolia regularly affects people in a 30km radius around the site. It is not a small group of people who are currently impacted. • The facility in its proposal stage is currently negatively affecting the mental health of members of the local community. • The community is significantly concerned about the ongoing impact to people's mental health if this proposal is approved. • Perception of the hazard; perception is real and therefore community members' mental health is at risk irrespective of what balance of probabilities of actual harm Veolia and the NSW government might apply to counter community concerns on this matter.
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Waste Feedstock	EIS section 4 and 6 Appendix I and G	<ul style="list-style-type: none"> Analysis of the waste feedstock for the proposed Woodlawn ARC fails to demonstrate compliance with the SEARs requirements for the following reasons: proposed waste feedstock waste is not residual from a resource recovery process that maximises the recovery of material in accordance with the NSW Energy from Waste Policy Statement (EPA, 2021); the analysis used to establish the details and a description of the classes, quantities and composition of waste streams to be thermally treated at the facility is insufficient to establish the waste stream suitability; and failure to establish an appropriate reference facility.
Waste Management	EIS section 4, 8 and 3 Appendix E and F	<ul style="list-style-type: none"> The waste management plans presented in the Woodlawn ARC Environmental Impact Statement (EIS) do not meet the requirements of the SEARs. There is no comprehensive list of the compositional components of the bottom ash and APCr. The Ash Management Study fails to provide a detailed description of the immobilisation process for flue gas residue as required in the SEARs. The report provides no detail on what byproducts are of most concern, nor the different stabilisation methods most relevant to each. The two stabilisation processes proposed are described only in terms of a broad overview of the processes required, and the information is insufficient to meet SEARs requirement to describe how waste produced at the site would be treated, stored, used, disposed and handled on site. The report fails to adequately describe the health risks associated with the reuse of IBA and the storage of bottom ash, nor how these risks can be adequately mitigated given emerging research of the contamination resulting in Europe from these procedures. The report presents no information on the treatment and management of Persistent Organic Pollutants (POPs) and other contaminants such as polyfluoroalkyl substances (PFAS), microplastics, brominated flame retardants (BFRs) including polybrominated diphenylethers (PBDEs) and PBDD/Fs, and dioxins (such as polychlorinated dibenzo-p-dioxins/dibenzofurans (PCDD/Fs). The report provides no information for how waste will be managed should IBA be deemed too hazardous for landfilling, and should APCr still be deemed hazardous waste following stabilisation The report fails to explain what management measures are proposed if IBA and APCr fail to meet the disposal criteria for RSW and landfill. The report bases its findings on “privately supplied data” (Ash Management Study, page 1) which is not made available for examination. Will this data be provided to the Department of Planning’s expert advisors for examination? Why is there no mention made of the emerging contamination being found associated with reuse of IBA?

Waste Management (continued)	EIS section 4, 8 and 3 Appendix E and F	<ul style="list-style-type: none"> The Ash Management Study notes that many of the “assumptions” made in the report will be subject to NSW EPA approval. The number of ‘assumptions’ in the study are concerning, and it fails to meet the SEARs requirement to “describe”, “demonstrate” and “detail”. Quantities and details on reagents for the treatment batching plant (Ash Management Plan, page 30) for waste stabilisation are not detailed, nor are the storage and risk mitigation requirements. References used in the Ash Management Study are quite dated, with many from the early 2000s, and several from the 1990s. This calls into question the validity of any claims made about the efficacy of stabilisation methods and the safety of waste by-product reuse.
Traffic and Transport	EIS section 8 Appendix T	<ul style="list-style-type: none"> Veolia currently ignores the significant impact that its regional waste haulage trucks have on the local roads. The EIS Traffic report gives no indication that Veolia recognises the impact its current operations have on the roads and other users. The increased number of heavy vehicles on the poorly maintained roads will exacerbate the damage being done to them by Veolia’s current operations. The increased amount of traffic on the road will put at risk the safety of everyone that has to drive on the poorly maintained single lane roads in the region. The study fails to properly account for the cumulative impact of Veolia’s additional trucking movements in conjunction with other State Significant Developments and significant road users, namely: <ul style="list-style-type: none"> Quarry trucking movements Blind Creek Solar Farm Develop mine operations Gundry Solar Farm Merino Solar Farm Bungendore High School Goulburn Poultry Processing

Soil and Water	EIS section 8 Appendix U, V and F	<ul style="list-style-type: none"> • The EIS assessment of soil and groundwater risk and known issues indicates that current waste water treatment is insufficient to manage contamination and that the impact of the ARC operation will increase the current levels of heavy metal and other contaminants now entering Crisp Creek through to the Mulwaree River and the Sydney Water Catchment. • The report makes numerous references to the cracking of the Woodlawn Evaporation Dams (in particular, ED1) is causing leaking and seepage which has infiltrated groundwater and resulted in heavy metals contamination. • The heavy metal contamination is evident in Crisps Creek, which feeds into the Mulwaree River, and forms part of the Sydney Water Catchment that feeds Lake Burragorang/ Warragamba Dam. • The report indicates Veolia do not plan to remediate the dams to protect groundwater assets, Crisps Creek and the Sydney Water Catchment. • The report notes that the clayey sediments underlying ED1 are saturated, receiving seepage from ED1 through historical operation of the dam. The applied load from the ARC encapsulation cell on the sediments has the potential to consolidate the clayey sediment, causing the water pressure (groundwater level) to rise and altering the local groundwater flow regime. • How will monitoring for seepage and groundwater disturbance translate to concrete action to prevent and rehabilitate pollution? The assessment lacks reference to specific actions that translate to ongoing monitoring into risk mitigation and pollution prevention. • The NSW EFW policy requires comparison to a 'like' facility. The Woodlawn facility is a remote facility and will need to provide all of its own services. The Staffordshire facility is not a remote facility. It discharges waste water to town reticulated waste water disposal. This not like for like comparison. • The report presents misleading information about the distance of the site from Goulburn to Canberra. • The proposed approach for mitigating water and soil contamination for dust suppression, leachate management and storm run-off indicate no before and after monitoring method will be applied for any indicators for ongoing monitoring of the cumulative impact from the ARC to the ground and surface water that beyond contaminating the local ground water has direct flow to the Sydney Water Catchment. • For the purposes of water/soil measurement - the site is not 50km from Goulburn and 70km from Canberra - it is 35km from Goulburn and 50km from Canberra city (40km from the closest ACT suburbs).
Fire and Incident Management	Appendix FF	<ul style="list-style-type: none"> • The community considers that presence of various hazardous and some being highly combustible materials presents an unacceptable to risk to the local community.

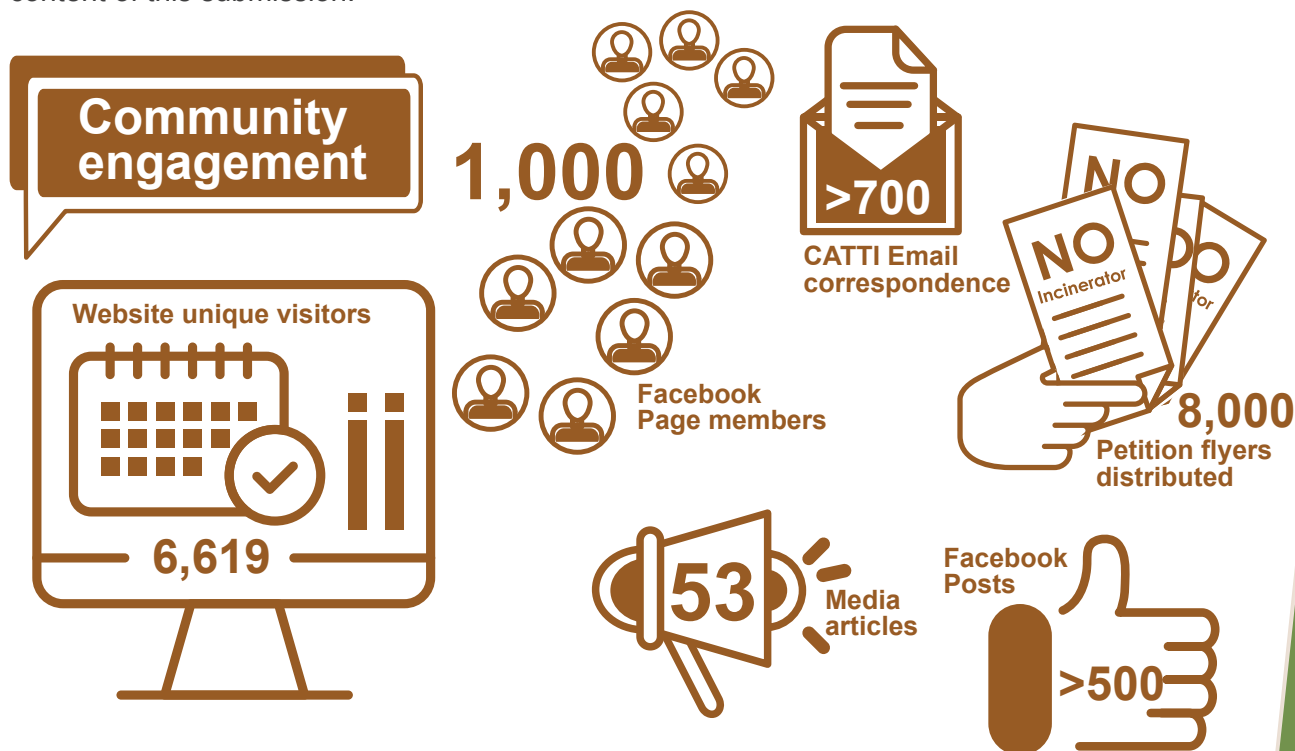
Hazards and Risk	EIS section 8 Appendix EE	<ul style="list-style-type: none"> The Preliminary Hazard Assessment identified that Activated Carbon and lother material present a safety risk at site and potentially to the local community. Due to Veolia's history of regulatory non-compliance the Community has no confidence that Veolia will maintain consiste safe standards for managing these hazardous materials.
Infrastructure Requirements	EIS section 1 Appendix N	<ul style="list-style-type: none"> The SEARS requirements for infrastructure requirements are not met. The Woodlawn ARC Scoping Report identified the possibility that transmission line infrastructure would need upgrading for the proposed development. The SEARs outlines the need to detail "all required transmission infrastructure upgrades" and associated works, management and mitigation. This detail is not provided in the Woodlawn ARC EIS.
Socio-Economic	EIS section 8 Appendix CC and DD	<ul style="list-style-type: none"> Veolia has no social license to operate. Community concerns about the waste incinerator are dismissed as simply being due to a "Not In My Backyard" (NIMBY) mindset. How can the NSW government accept this name-calling as valid? The Eastern Creek Incinerator did not get approval because the then NSW Premier Gladys Berijyklian and the NSW Land and Environment court agreed with residents that people did not want a toxic incinerator in their backyard. The waste incineration facility transfers Sydney's waste to Tarago - "out of sight, out of mind". Veolia's current operations have negatively affected the region's socio-economic values. Veolia admits this negative impact. What cost will the Sydney Councils pay to compensate the people of Tarago and the region who will be negatively affected by Veolia incinerating their rubbish? Rental properties are in short supply. The construction period will significantly increase housing demand. Veolia has no accommodation plan. Many businesses in the region are already struggling to attract the workers that they need for their business. Having to compete with a company such as Veolia for staff will only exacerbate this issue. The community do not trust Veolia or the NSW government to treat them with honesty and respect. The NSW government refused a FOI request for reasons why Tarago was designated as a site for a waste incinerator on the grounds of cabinet confidence. Recycling and composting creates more jobs than waste incineration. A WTE incinerator will negatively affect property values.

Visual	EIS section 8 Appendix BB	<ul style="list-style-type: none"> The assessment fails to accurately represent the impact the proposed facility will have on the visual landscape of the surrounding area as rural landscape. The development will negatively impact the region's visual amenity by increasing the presentation of an industrial landscape rather than the rural landscape for which this region is known. The project is 8km from Lake George, and as local residents know, the Woodlawn site can be seen when looking back across Lake George from the Federal Highway, and Lake George can also be seen from a number of vantage points along Collector road.
Aboriginal Cultural Heritage	EIS section 8 Appendix Z	<ul style="list-style-type: none"> The Aboriginal Cultural Heritage Assessment fails to meet the SEARs requirements. The assessment: <ul style="list-style-type: none"> failed to accurately describe the impact of the development on the landscape, in particular, the culturally significant site of Lake George; failed to engage in proper and respectful consultation; and misrepresents the extent of support from Registered Aboriginal Parties (RAPs) as only five of the fifteen RAPs indicated support for the proposal.
Biodiversity	EIS section 8 Appendix Y	<ul style="list-style-type: none"> Frogs were not surveyed, even though they were heard in PCT 1256 (5.1, 5.3.4). Justification given for not surveying frogs was that PCT 1256 is outside of the subject land (5.3.4). The assessment of impact on the critically endangered Yellow-spotted Tree Frog (<i>Litoria castanea</i>) says that species is not known to occur on the subject land and no estimate can be made of the number of individuals present in the subpopulation (Table 7.9). The report has strategies to mitigate impacts on yellow-spotted tree frogs (7.3.1) but potential foraging and shelter habitat will be impacted (table 8.10) How can the project be considered unlikely to lead to a long-term decrease in the population size of this critically endangered species (table 8.10) without an actual survey of yellow-spotted tree frogs, especially given that there is evidence of frogs? The access road is next to the wetland site PCT 1256. The report states that the overall long-term impact of vehicle strikes associated with the project is unlikely to have a significant impact on populations of threatened species or fauna that are part of a threatened ecological community (Table 7.4). How can such a conclusion be drawn, especially as Veolia trucks will be running "24 hours per day, seven days a week" (1.1.2), meaning constant use of the access road?
Biosecurity	EIS section 4 (feedstock)	<ul style="list-style-type: none"> The EIS noted that Veolia will operate the ARC under its existing Biosecurity approvals. The community has received no information about assessment biosecurity risk and whether the existing arrangements are sufficient for the scale of operation, volume and diverse types of feedstock to be incinerated?

Greenhouse Gas and Energy Efficiency	EIS section 8 Appendix Q	<p>The Greenhouse Gas Impact Assessment fails to meet the SEARs requirements. The assessment lacks validity as it:</p> <ul style="list-style-type: none"> • is inconsistent with legislative/policy aims; • lacks a comprehensive calculation of emissions for the proposed development; • presents insufficient/incomplete information; and contains numerous typographical errors and misleading statements.
Bushfire	EIS section 8 Appendix X	<ul style="list-style-type: none"> • The increasing intensity of wild fires means that proposed fire management arrangements are unlikely to cope with catastrophic fire conditions and therefore the consequences of harm due to hazardous materials on site are unacceptable to the community.
Ecologically Sustainable Development	EIS section 9	<ul style="list-style-type: none"> • The community do not consider this proposal to meet the criteria for ecologically sustainable development. • As scientific studies demonstrate, Waste Incineration does not contribute to the development of circular economy. • Veolia's actions to date have caused air pollution and presence of heavy metals in the ground and surface water through to the Sydney Water Catchment.

CATTI Record of Community Involvement

In the absence of genuine and meaningful community engagement from either Veolia or the NSW Department of Planning, CATTI volunteers have spent thousands of hours over the last 18 months filling this gap by informing the community of the project, engaging with stakeholders, researching the science and lived experience of communities nearby such facilities overseas, and encouraging participation in the assessment process. It is clear through these efforts, CATTI has engaged with a significantly larger number of community members and stakeholders than Veolia. The results of this engagement have confirmed overwhelming community opposition which is reflected in the content of this submission.



CATTI community and public engagement activities

Channel/Activity	Volume	Comments
Participation in industry conferences/webinars/community information sessions	6	This included participating in waste industry conferences, webinars and community information sessions all on waste to energy incineration.
Working Groups with other community organisations	16	This included participating in working groups and community organisations from Tarago, Goulburn, Sydney and Richmond Valley.
CATTI meetings	10	Regular meetings were held by CATTI as required and consistent with the <i>NSW Associations Incorporation Act 2009</i> .
Market stalls	16	CATTI participated in numerous market stalls across the region including Tarago, Goulburn, Bungendore and Canberra.
Cafe drop-in sessions	3	CATTI facilitated local drop-in sessions at the Tarago Cafe to assist locals in lodging submissions to Veolia's proposal.
Meetings with MPs and political candidates	8	Numerous meetings were held with local MPs, local state and federal political candidates and party representatives.
Public Protests	5	CATTI participated in multiple public protests against this proposal representing the wider community position.



NSW Legislative Assembly Petition	2,525	CATTI led a petition to the NSW Legislative Assembly against the Tarago incinerator proposal gaining 2,525 signatures.
ACT legislative Assembly Petition	919	CATTI led a petition to the ACT Legislative Assembly calling on the ACT Government to oppose the Tarago incinerator proposal, gaining 919 signatures.
Advertisements in local newspapers	7	Multiple advertisements were placed in the Tarago Times and Bungendore Regional Independent newspapers.
CATTI Newsletter/ website news posts/ update emails	19	This included issuing the Tarago Toxic Burner newsletter, website news posts and regular emails to the CATTI website contact list throughout the Public Exhibition Period.
Media articles	53	CATTI has featured in media articles published in the Goulburn Post, Goulburn Express, Tarago Times, Regional Independent Bungendore, Canberra Weekly, Canberra Times, Southern Highlands News and The Daily Telegraph.
Media releases	4	Four media releases were issued by CATTI during the Public Exhibition Period to inform the community through local, regional and national news outlets.
Television/Radio/ Podcast interviews	13	CATTI participated in multiple media interviews including WIN News Canberra, WIN News Illawarra, ABC Radio Breakfast Sydney, ABC Radio Breakfast Canberra, and Canberra local radio.
Petition flyers distributed	8,000	Flyers promoting the NSW and ACT petitions were distributed throughout the region including via local businesses and markets.
Letter box drops	26,000	CATTI undertook significant letter box drops of the surrounding community and region throughout the public exhibition.
No Incinerator signs distributed	220	Signs were distributed throughout the community and region to individuals and businesses so they could demonstrate their opposition to this proposal.
No Incinerator bumper stickers distributed	400	Bumper stickers were distributed throughout the community and region to individuals so they could demonstrate their opposition to this proposal.
CATTI website mailing list	148	148 individuals registered via the CATTI website to receive regular newsletters and update emails.
CATTI Email correspondence	>700	CATTI has received in excess of 600 emails from members of the public, community organisations, local representatives and other stakeholders.
Website unique visitors	6,619	This significant number of unique visitors to the CATTI website is almost three times the number of visitors to Veolia's project website.
Average website session duration	5 min. 53 sec.	The longer than usual average CATTI website session demonstrates sustained engagement with the community.
Facebook Page followers	352	
Facebook Group Members	1,000	
Facebook Posts	>500	
Facebook Advertising Reach	62,992	Again this Facebook advertising reach compares to Veolia's reach of 16,500 quoted in the EIS.
Instagram Posts	38	

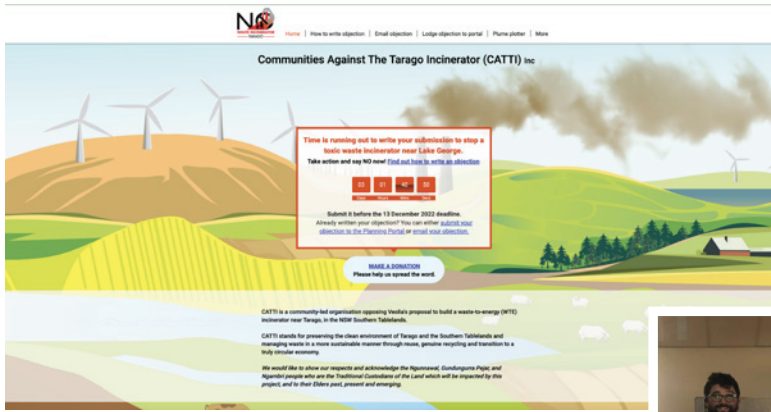


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agoincinerator



- Minimise risk to human health and the environment by taking all reasonable steps to eliminate injury and illness to employees, subcontractors, visitors and members of the community who may be affected by the operations of our facilities and services, and to prevent pollution of air, water or land.
- Reduce our carbon footprint by pursuing opportunities to reduce, reuse and recycle.





Conclusion

Veolia have had two years to develop, justify and prove their proposal is necessary, safe and obtain community acceptance. They have failed on all counts.

This proposal constitutes a significant and unacceptable risk to the health and environment of surrounding communities and there is no evidence it would meet NSW regulatory requirements. It would result in unacceptable cumulative impact to Tarago and the region, would fail to deliver economic and social benefits, has no community acceptance to operate, and the community cannot be protected from its harm via licence conditions or regulation. It would also provide no additional waste management capacity for NSW over the next 25 years.

The proposal is not in the public interest. In the interests of human health, the environment, the local agricultural economy, future generations, and consistent with cited precedent, this project must be rejected in its entirety with no further opportunities to amend, adjust or resubmit.



References



Artwork by
Kaylani Boyd (Age10)

Lake Bathurst, 5km from the
proposed incinerator

- 1. NSW Energy from Waste Policy Statement, NSW Environmental Protection Authority, June 2021**
<https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/waste/21p2938-energy-from-waste-policy-statement.pdf>
- 2. Facts about “waste-to-energy” incinerators, GAIA (Global Alliance for Incinerator Alternatives), 2018.**
- 3. Particle Pollution Exposure, United States Environmental Protection Agency,**
www.epa.gov/pmcourse/particle-pollution-exposure
- 4. Questions and answers about odours in the Tarago area, NSW Environmental Protection Agency, June 2021**
<https://www.epa.nsw.gov.au/news/news/2021/questions-and-answers-tarago-odours>
- 5. NSW Government Energy from Waste Infrastructure Plan, September 2021** <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/waste/21p3261-energy-from-waste-infrastructure-plan.pdf>
- 6. Tait et al 2020: The Health Impacts of Waste Incineration – A Systematic Review, Australian and New Zealand Journal of Public Health, vol.44 no.1**
- 7. Health and Well-Being, The Global Health Observatory, World Health Organisation,** <https://www.who.int/data/gho/data/major-themes/health-and-well-being#:~:text=Mental%20health%20is%20an%20integral,protect%20and%20restore%20mental%20health>
- 8. Hidden emissions of dioxins from waste incinerators, Arkenbout, ToxicoWatch, 2020**
- 9. After Incineration: The Toxic Ash Problem, IPEN 2005**
- 10. Greenhouse Gas and Air Quality Impacts of Incineration and Landfill, Eunomia, 2022.**
- 11. NSW Electricity Infrastructure Roadmap, NSW Department of Planning, Industry and Environment, Nov 2020**
<https://www.energy.nsw.gov.au/sites/default/files/2022-08/NSW%20Electricity%20Infrastructure%20Roadmap%20-%20Detailed%20Report.pdf>
- 12. National GreenPower Accreditation Program: Program Rules, Version 10.2, 2021**
<https://www.greenpower.gov.au/sites/default/files/2021-05/GreenPowerProgramRules-Version10.2%20FINAL.pdf>
- 13. NSW Waste and Sustainable Materials Strategy 2041 – NSW Department of Planning, Industry and Environment, June 2021**
https://www.dpie.nsw.gov.au/__data/assets/pdf_file/0006/385683/NSW-Waste-and-Sustainable-Materials-Strategy-2041.pdf
- 14. “Deliver or pay”, or how waste incineration causes recycling to slow down, Zero Waste Europe 2017** <https://zerowasteurope.eu/2017/10/deliver-pay-waste-incineration-causes-recycling-slow/>
- 15. Tarago rail yards lead contamination, Current Projects, Transport for NSW** <https://www.transport.nsw.gov.au/projects/current-projects/tarago-rail-yards-lead-contamination>
- 16. EPA Prevention Notice 3503885 REG-3326, 24 October 2022, NSW Environmental Protection Agency** <https://apps.epa.nsw.gov.au/prpoeoapp/ViewPOEONotice.aspx?DOCID=-1&SYSUID=1&LICID=11436>
- 17. Hidden emissions: A story from the Netherlands (CaseStudy), ToxicoWatch and Zero Waste Europe 2018.**

- 18. After Incineration: The Toxic Ash Problem, IPEN 2005**
- 19. www.epa.gov/acidrain USA Environmental Protection Authority, 2022.**
- 20. Energy from Waste, Report from the NSW Chief Scientist & Engineer, with additional advice as at November 2020**
- 21. EPA Penalty Notice 3173531433, 28 November 2022, NSW Environmental Protection Agency**
<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=11436&id=1624406&option=notice&range=POEO%20licence>
- 22. Licence Summary, Licence No 11436, Veolia Environmental Services (Australia) Pty Ltd, Woodlawn Landfill**
<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=11436&id=11436&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued>
- 23. Statement of Reasons, Eastern Creek Energy from Waste Facility, Independent Planning Commission 2018**
<https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2018/04/eastern-creek-energy-from-waste-facility-ssd-6236/determination/statement-of-reasons.pdf>
- 24. Ethics Explainer: social license to operate, The Ethics Centre, 2022**
<https://ethics.org.au/ethics-explainer-social-license-to-operate/#:~:text=The%20social%20license%20to%20operate,formal%20or%20informal%20in%20nature.>
- 25. EPA Comments on the Odour Audit, DOC22/350839-1, 10/05/22, NSW EPA.**
- 26. GIPA EPA783 - 8 April 2022. Veolia's Woodlawn Facility: Full release of formal warnings and disciplinary actions not provided on the NSW EPA public register.**
- 27. Good conduct and administrative best practice, Guidelines for state and local government, Ombudsman NSW 2017**
https://www.ombo.nsw.gov.au/__data/assets/pdf_file/0009/125784/Good-conduct-and-administrative-practice-guidelines-for-state-and-local-government.pdf
- 28. Mental Health on farms, SafeWork NSW, 2022**
<https://www.safework.nsw.gov.au/your-industry/agriculture,-forestry-and-fishing/farming/mental-health-on-farms>
- 29. Summary Licence No: 11436, Veolia Environmental Services (Australia Pty Ltd), Woodlawn Landfill, NSW EPA**
<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=11436&option=licence&range=POEO%20licence&searchrange=>