

9 October 2019

Ms Sally Munk
Principal Planning Officer
Industry Assessments
Department of Planning, Industry & Assessment
320 Pitt Street
Sydney NSW 2000

Dear Ms Munk

Re: Scoping Report for SEARs for the Proposed Botany Cogeneration Plant

Thank-you for the opportunity to comment on the proposal by Suez Recycling and Recovery Pty Ltd to construct and operate a fit for purpose Cogeneration Plant to produce steam and electricity to offset existing natural gas generated steam and grid electricity requirements at the Orora Recycled Paper Mill at Matraville.

It is understood the Project objectives are to:

- Provide a custom – fit energy solution for the Orora Recycled Paper Mill in order to offset the cost of importing energy, minimise supply reliability risks and enhance energy security for the operation of the Orora Recycled Paper Mill now and into the future.
- Assist Orora in moving towards decarbonising its operations by utilising a more sustainable fuel source based on the re-use of existing materials and reducing its reliance on fossil fuels, in line with its objective of sustainable practices and reducing its carbon footprint.
- Establish a pioneering plant in Australia which fully complies with applicable regulations and standards.
- Improve market competitiveness by achieving reduced costs whilst maximising sustainability at the Orora Recycled Paper Mill, supporting ongoing domestic recycling activities.
- Promote a circular economy and reduce process residuals disposal costs by using mill residuals and Processed Engineered Fuel as fuel and thereby diverting these waste streams from landfill consistent with the waste hierarchy.
- Manage potential environments impacts associated with the construction and operation of the Project in an environmentally and socially responsible manner.

The project would be located on existing disturbed, brownfield land which is zoned for industrial use. Land use surrounding the site comprises industrial zones to the south and northwest including Port Botany operations, approximately 500 m to the west and Sydney Airport approximately 3 km to the north-west. The nearest residential receivers are understood to be 130 m to the east along Moorina Avenue Matraville.

The South Eastern Sydney Public Health Unit has reviewed the scoping paper and in particular the Identification of Key Environmental Assessment Issues which has determined that air

quality and health risk has been rated as very high environmental health significance. Given that, we recommend the following:

- A qualitative assessment of the potential air quality and odour impacts for the development on surrounding landowners and sensitive receptors.
- A human health risk assessment which:
 - Assesses health risks associated with exposure to environmental hazards, including impact of stack emissions during operation
 - Provides a detailed description on how the sensitive receptors were chosen and who they are. Vulnerable groups including CALD, should be referenced, as should the elderly and children.
 - Includes an assessment of land contamination in relation to human health.
 - As the site is located in the Botany Management Zone 1 due to legacy groundwater pollution, this issue should be addressed as part of the Human Health Risk Assessment as some of the identified contaminants are heavy metals, ammonia and hydrocarbons.
- Detailed assessment of noise mitigation, management and monitoring measures likely to impact on human health, during both construction and operational phases.
- An assessment of dust control measures during the construction phase.
- As the development is close to Sydney Airport and any pooling of water could provide a breeding ground for mosquitoes, a specific mosquito management plan is developed and able to be reviewed by NSW Health.

For further information about this matter, please don't hesitate to contact Ms Toni Cains, Senior Environmental Health Officer on 9382 8242.

Yours sincerely



Professor Mark Ferson MPH MD FRACP FAFPHM FRSPH
Director and Public Health Officer