

Dear EPA

I am writing to you about the Woodlawn Advanced Energy Recovery Centre that is being proposed as a NSW State Significant Project to be built in the Woodlawn Precinct, near Tarago NSW. Fancy words will not change what it is; it is an incinerator to burn rubbish. Nothing more, nothing less. After experiencing the force of the wind in the 2020 summer, and the bush fire smoke that came with it, I have real concerns for my own health as well as that of my family and the surrounding communities from this incinerator.

Who is affected?

This project is causing local communities significant anxiety.

- The Tarago community and surrounding agricultural and rural residential communities are against this project.
- Both relevant councils — Goulburn-Mulwaree and Queanbeyan-Palerang — are against this project.
- NSW Parliamentary representatives — Wendy Tuckerman MP (Goulburn) and Nichole Overall MP (Monaro) — have said they are against this project. This maybe wise under the current political landscape and impending NSW election.

The plume from the incinerator is also likely to reach and affect people in the ACT (see <https://www.notaragoincinerator.com/plume-plotter>). The ACT Government has already banned waste incineration due to health concerns and community backlash when a similar proposal was put before them.

What are the problems?

The NSW Government sees this incinerator as a great project, in fact State Significant. They have said that 'energy from waste is an emerging technology in Australia and involves the thermal treatment of waste or waste-derived materials for the recovery of energy' (NSW Government, n.d.).

This incubator is not an emerging technology. It is not even a new technology. This incubator will be burning rubbish that contains plastics and other toxic materials including commercial waste. Burning rubbish has been banned in Australian backyards for decades. Europeans have been burning waste in incinerators for decades. It is not new. But the Europeans are now moving away from burning waste as it creates dangerous dioxins and contaminates the region around it. It also creates toxic ash that needs to be stored in concrete bunkers (something that so far Veolia has not said how they are going to store at the community meeting, May 2022). Why are we starting to build waste incinerators if Europe is moving away from them? We need to be cutting edge and not looking for a quick fix solution (ABC News, 10/10/2021).

The people who oppose this incinerator — individuals and communities — are up against a big multinational corporation that is hell bent on building this facility. Veolia state they will be '... creating jobs, support regional communities and generate energy' (Veolia,

2022). But really they are a company and the focus of any company is to make a profit. This aim should not be at the expense of these communities' health and livelihood (The District Bulletin, 15/2/2022). Veolia have already had numerous environmental breaches in Australia, why risk another possibly worse one (see <https://www.epa.nsw.gov.au/news/media-releases/2021/epamedia210723-epa-fines-veolia-environmental-services-for-waste-offence> and <https://apps.epa.nsw.gov.au/prpoeoapp/ViewPOEONotice.aspx?DOCID=-1&SYSUID=1&LICID=3503885?>)

The Tarago residents have created a not-for-profit association *Communities Against the Tarago Incinerator (CATTI) Inc* to combat the waste incinerator project. They have scant funds and minimal time. They are up against a multinational corporation who is gaslighting them — a resident's words in their Facebook group — and stopping them from finding out critical information in their fight for a safe and toxic-free region. Veolia has already breached its operating conditions and residents have filed complaints about the smell from their current bioreactor landfill operation. Veolia is now blocking residents from seeing documentation, which shows when and how many times these breaches have occurred (The Canberra Times, 19 June 2022). How much faith can the community have that this company is safely able to operate a facility that has significantly higher health risks — cancer a major one — than what they are currently operating (Science Diet, September 2020)? The Tarago group had a zoom meeting with former members of a community consultative committee in Sheffield where there is a similar energy from waste incinerator run by Veolia. In this meeting the Sheffield participants mentioned that '... the Veolia manager of the plant admitted that there had been breaches of compliance when the wrong materials were burnt and there had been toxic gasses emitted' (pers. comm., 5 May 2022).

Veolia cannot guarantee that there will be no leakage or contamination in our region from this incinerator. Conditions of operation set by the EPA are not tough enough, particularly when nothing has been done about the horrendous smell coming from Veolia's current bioreactor landfill operations — a fine and a fix notice doesn't amend any breach that has occurred.

The stench in Tarago from the waste that is sent by train from Sydney to the bioreactor landfill operations is significant. Odours linger for hours, even days. Just driving through is an assault to the senses. The smell even travels across Weereewa (Lake George) to Gundaroo (information from a residents local Facebook group). People who live on the other side of Weereewa from the Woodlawn Precinct regularly smell the bioreactor landfill.

Treatment of past contamination issues does not augur well for the future. Tarago residents are already dealing with lead contamination from the Woodlawn mine near Tarago. Many areas along the rail corridor from the mine are contaminated with lead, including the Tarago public school, several private residences and a number of household water tanks. Transport for NSW did not inform residents for nearly five years of this contamination (ABC News, 16/3/2020). Similarly in 2021 Bungendore was found to have lead-contaminated land along the rail corridor from the lead mine in Captains Flat that

closed in 1962. This has resulted in fenced off areas and the Bungendore Men's Shed can no longer use the old wool storage shed as a meeting place (Transport for NSW, 2022). Why did it take so long to tell residents of the toxic and harmful lead in these locations? Why did it take so long to test for its presence? How soon and ongoing would testing for leakage or contamination from the proposed waste incinerator be done and when would the community be informed about this by relevant authorities?

The proposed incinerator sits within the Sydney drinking water catchment. It sits exceptionally close to Bungendore's water supply — Weereewa (Lake George). Surrounding rural residents mainly use rainwater from roofs for drinking, washing and often for watering plants including fruit trees and vegetable gardens. Water NSW has said that the development must 'provide a clear description and justification as to how the development would achieve a neutral or beneficial effect on water quality' (Water NSW, 20/6/2021).

Not only is the whole issue of waste incineration of concern, but Veolia and the NSW Government are proposing to build this waste incineration facility in a high wind area — an area where the plume can spread further. The existing wind farm between Bungendore and Tarago is so successful that they are looking at increasing the number of wind turbines (NSW Planning Portals Major Projects, 2022).

What is the solution?

It is planned that the proposed incinerator would run for 30 years. It is being touted as a great solution to the Sydney waste problem. This is greenwashing at its best. It is not a good environmental solution at all.

This infrastructure will not help reduce emissions and will produce toxic waste. A reduction of landfill emissions only occurs when organic waste is burned, but that can be composted which is more sustainable and safer than burning (Zero Waste Europe, 26/5/2021). They contribute to climate change by emitting CO² amongst reducing jobs and recycling of resources. (GAIA, 2018)

A better solution would be to not create plastic waste in the first place. This is particularly important now the soft plastics recycling chain has broken down (https://www.smh.com.au/national/coles-woolworths-recycling-scheme-collapses-after-secret-stockpiles-revealed-20221107-p5bw9q.html?fbclid=IwAR0B9-rWzLRTxfh5U0PwTi7roJaoCB4GC7LyDf_2_12W4jpXrZcOpYxZTiU).

Manufacturers have the capacity to make the necessary changes. An example is that smarties now come in a paper bag. Other products such as chocolate could be sold wrapped in foil and paper that can be recycled, like it used to be sold. Packaging that can be re-used is essential (bulk food stores where you take your own packaging are one answer).

What will happen to Sydney's rubbish if the incinerator is not built?

Sydney creates a lot of waste. If they really want an incinerator, the NSW Government should look at building this incinerator IN Sydney where the waste is coming from rather than pandering to the Sydney attitude of out of sight out of mind. But Sydney residents don't want a waste incinerator built there, and as there is a higher density of population it appears neither does the NSW Government, except possibly for people from Western Sydney (ABC News, 7/2/2022). If it is not safe for the residents in Sydney (The Guardian, 2018) (The Sydney morning Herald, 10/4/22), why is it safe for rural residents — should I also say and maybe the marginalised Western Sydney residents?

The NSW Government has even said it is satisfactory to build such incinerators in rural areas. They say they should be located 'away from high-density residential areas' near Bathurst, Lithgow, Casino and Queanbeyan..." (ABC News, 7/2/2022). So instead they will build it in an area where people farm (livestock, eggs, vegetable and fruit) and use rainwater tanks for drinking water, washing and irrigating?! Waste incineration is not safe — my health, our communities' health, is as important as the health of residents in high-density residential areas.

Sydney residents need to be mindful of their waste, do more composting, more recycling, and reduce the waste. Overall we need to create less waste in the first place. It is possible. While some businesses are starting to change it needs to be all businesses and governments, and more change and faster. We are already living in a world with significant climate change with floods, bush fires and extreme weather conditions. Burning rubbish in a waste incinerator in Tarago — or anywhere in Australia — is not an extra burden we need.

We have had recycling in this country for my whole life and longer. I remember in the late 1970s our glass bottles were recycled, as were steel and aluminum cans, paper and cardboard.

We have had significant education in our Australian Schools with AuSSI (Australian Sustainable Schools Initiative), and now Sustainability embedded into the curriculum as a cross-curriculum priority. This means every school subject can find an aspect of sustainability, which they can teach in the classroom. I was one of the trained teachers to be a Sustainable Schools Officer in the high school where I taught, even being awarded a Highly Commended Individual Award in the Education Section of the ACT 2007 No Waste Awards. Our young people want change, they want climate action and they want sustainability, as they have been learning this explicitly for at least 20 years. They do not want to be left with an environmental disaster (World Health Organisation, 2021).

I have given you information about why incinerators are not the answer but you might like to read more about it too. I have references below and the CATTI Inc has a long list of references as to why it should not be built (<https://www.notaragoincinerator.com/research>). Any organisation, government, consultant or researcher etc... who labels a community opposing a waste incinerator as NIMBY (not in my backyard), needs to have a close look at themselves as I doubt any of

them would want a waste incinerator near their home/work/playground/school/shops/food production/etc...

Waste incinerators—Energy from Waste or whatever the name they are choosing to use—should not be built ANYWHERE in Australia. Building a waste incinerator in my region amounts to an experiment without consent. I do not want to take a risk that my land, my health, and my community's health and wellbeing will be compromised if there is an escape of toxins. For it to be built and see if it will be safe when '... the risks were just too great ... There were no adequate guarantees to ensure the health and safety of people in Western Sydney' (The Guardian, 2018) is stupid. Note: even though the Western Sydney waste incinerator appeared to have been stopped, it seems to be back on the agenda (NSW Government, 2022). Communities should not have to fight continuously for their health and wellbeing against waste incinerator projects and multinational corporations who do not have their best interests at heart. Waste incineration should be banned. Nothing that Veolia can say and document can assure it will be 100% safe; no amount of research will say it is 100% safe. We have already had massive issues in this country with asbestos, thalidomide, PFAS and silicosis. Don't make waste incineration the cause of the next medical disaster in this country.

Put people before profits.

We have an amazing country let's not destroy any more than we already have. Please ban any incinerator — Advanced Energy Recover Facility, or what ever name they choose, that will burn waste in Tarago, other regions in NSW and Australia. Stop it before it is built.

Thank you for your time

Yours sincerely

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