



1 December 2022

Department of Planning and Environment,
Locked Bag 5022,
Parramatta NSW 2124.

Dear Sir/Madam,

Woodlawn Advanced Energy Recovery Centre
Application Number: SSD-21184278
Assessment Type: State Significant Development
Development Type: Electricity Generation - Other
Local Government Area: Goulburn Mulwaree

I wish to make a submission to the proposed development 'Woodlawn Advanced Energy Recovery Centre.

It is abundantly clear to me that most of the people in my electorate and beyond do not support the proposal of waste incineration.

The small village of **Tarago** is situated approximately 40 kilometres south of Goulburn with a population of approximately 510. The Veolia eco-precinct is located outside of the village of Tarago.

The system which Veolia operates on currently receives the municipal solid waste of Sydney sent to two transfer terminals; where it is sorted and loaded for transport by rail to Crisps Creek; and then by truck to the Woodlawn site – which it is presently used as landfill.

The 'ARC', a \$600m waste-to-energy (WtE) project, proposes an additional step once this waste is delivered to Tarago. Burning 380,000 tonnes of rubbish to generate steam and electricity to the tune of 39MW the equivalent of power to 50,000 homes annually.

From the website of the proponent: *The energy-from-waste process is well regulated and proven to be safe.*

Please note, the proponent as a result of odour complaints has recently been fined by the Environmental Protection Authority for mismanagement of odour control. This is a poor reflection on the proponent's ability to comply with, monitor and regulate. If the facility is not well regulated does that mean it will not be safe? This presents a huge risk to human life and the environment.

It appears the electorate of Goulburn is an attractive dumping ground for Sydney's waste due to its proximity to the larger metropolis. I again state, if this method of waste disposal is suitable, why have incinerators not been approved and operated where most of the waste is disposed, in the metropolis of Sydney.

One could only assume that the disadvantages of waste-to-energy are numerous and have become more apparent in recent years. They include the pollution and particulates it generates, the destruction of useful materials, and the potential to disincentivise more sustainable waste management solutions and renewable energy sources.

If people, organisations, or governments believe that waste-to-energy is a viable sustainable energy source and waste management technique, they are less likely to engage with or invest in more impactful solutions, such as reduction, reuse, or recycling. This can already be seen with the classification of many WtE power plants as “renewable energy”.

Almost all the carbon content in the waste that is burned for WtE is emitted as carbon dioxide, which is one of the most notable greenhouse gases. That said if the waste-fuel is biomass – i.e., of natural origins, such as food waste, paper and paper board, wood, natural cloths like cotton – then the CO₂ it contains was originally drawn from the atmosphere. However, plastics and other oil-based products, which are also burned in WtE, are equivalent to any other fossil fuel and emit damaging greenhouse gas emissions. What seems clear is that waste-to-energy’s benefits only exist when comparing it with traditional landfilling or incineration as a waste management system. However, when viewed on its own, the problems are so fundamental that it’s hard to consider it as a viable part of any green, circular economy. At a time when businesses, municipalities, cities, and countries are looking towards zero waste, there is no place for waste-to-energy.

Of particular concern to me is the risk to human health.

I refer to the expert advice from the NSW Chief Scientist and Engineer, Mr Hugh Durrant White, whereby he advises.

Exposure to particulate matter (PM) can be linked to increased mortality, hospitalisations and respiratory disease. A large body of scientific evidence supports this. AAQ monitoring of airshed quality in NSW and internationally measures both PM₁₀ and PM_{2.5}. AAQ data are used in large scale population health studies to understand better the health impacts of particulates overall as well as specific health impacts associated with coarse and fine particles. Understanding health impacts of UFP is a major area of research internationally. However, there is incomplete information about the development, size distribution and composition of UFP, and challenges remain in our ability to accurately and separately monitor these particles.

And this.

Currently, there is no means of assessing the impact that a single source of emissions (e.g., a specific plant) will have on an individual. (Ref.1)

During a recent community meeting representatives of the proponent advised that there have been no soil studies undertaken of surrounding prime agricultural land.

The Chief Scientist advises that *The Human Health Risk Assessment (HHRA) should consider food as an exposure pathway.*

We know that one of the main contaminants of concern are Dioxins. Dioxins are found throughout the world, they accumulate in the food chain, mainly in the fatty tissue of animals. Mercury is also a toxic heavy metal and incineration has been known to produce high levels of this pollutant.

Across NSW regional plans have been adopted to provide a blueprint for growth until 2036, recognising the need for the state's best agricultural land to be preserved. The NSW Government has guidelines in place to ensure the potential impact of projects on prime agricultural land is properly assessed during the planning approvals process, protecting our food bowl.

Biophysical Strategic Agricultural Land (BSAL) is land with high quality soil and water resources capable of sustaining high levels of productivity. BSAL plays a critical role sustaining the State's \$12 billion agricultural industry.

A total of 2.8 million hectares of BSAL has been identified and mapped at a regional scale across the State.

Tarago has a mapped area of BSAL. (Ref.2)

When conducting A Human Health Risk Assessment, it is imperative to address environmental hazards of concern and evaluating how likely it is that the environment might be impacted as a result of exposure to one or more environmental stressors, such as chemicals, in this case persistent organic pollution (POP).

A recent study by ToxicoWatch of incinerators in three countries – Spain, Czechia, and Lithuania, identified high levels of persistent organic pollution (POP) contamination in the surrounding areas of waste incineration facilities, it also found that contamination levels posed a 'significant risk to the environment and to the health of people nearby'.

Analysis of vegetation, pine needles, and mosses also shows high levels of dioxins, the report states, adding that 'people living in the vicinity of incinerators could be harmed' if they eat vegetables grown in contaminated soil. (Ref.3)

The Chief Scientist Hugh Durrant Whyte in his report specified that Waste incinerators should not be near food production. The Waste precinct is surrounded by productive agricultural lands producing grains, silage, sheep and cattle, vineyards and is near Sydney's Water Catchment Area not to mention the many households, schools that rely on tank water in the area.

In NSW, Government policy provides a framework by which a project that proposes to recover energy from the thermal treatment of waste (energy recovery facility) only occurs where it delivers **positive outcomes for human health and the environment**.

Proponents who seek to operate energy recovery facilities must comply with the 2015 NSW Energy from Waste Policy Statement, to protect the community and ensure best use is made of waste materials.

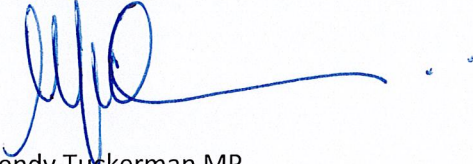
By imposing this project on the people of the Goulburn electorate and surrounds it is imposing an intolerable burden on a hard-working rural community, a project which they do not accept, this is in stark contrast to the conditions to be met under the Energy from Waste Policy Statement for a valid pathway, that being; **Community acceptance to operate such a process has been obtained**.

I reference the submission from the Goulburn Mulwaree Council who concludes that the proponents Environmental Assessment has demonstrated numerous deficiencies that in the opinion of Council Officers does not allow for a complete assessment of the development application, does not sufficiently or appropriately justify a demonstrated need for the project, nor does it demonstrate a

minimal impact upon the environmental and public health, not only in the immediate vicinity of the proposed development but also on a much wider regional scale.

I am unconvinced that enough studies have been undertaken to prove there are no risks associated with EtW projects to human life, the environment, agriculture, and food production and as such I am opposing the Woodlawn Advanced Energy Recovery Centre proposal alongside my community.

Yours sincerely,



Wendy Tuckerman MP,
Member for Goulburn
Minister for Local Government

Ref.1 https://www.chiefscientist.nsw.gov.au/_data/assets/pdf_file/0019/357400/FINAL-Report_EFW-with-additional-advice.pdf

Ref.2 [strategic agricultural land map - sheet sta 035.pdf](#)

Ref.3 <https://resource.co/article/zwe-finds-surroundings-waste-incinerators-are-highly-contaminated>