



Tarago and District Progress Association Incorporated

ABN: 20 532 382 103

Postal Address: 18 Wallace Street, Tarago, NSW, 2580

Email: tadpaisecretary@gmail.com

“Promoting the Social and Economic Development of Tarago Village and District”

05 December 2022

Dear Ms Mink

RE: OBJECTION TO WOODLAWN ADVANCED ENERGY RECOVERY CENTRE (ARC) ENVIRONMENTAL IMPACT STATEMENT (EIS) - APPLICATION NUMBER: SSD-21184278

The Tarago Community is comprised of the people who live in the village of Tarago, and those on farms and farmlets in the Tarago and surrounding Districts. The Tarago Community is split across the local government areas of Goulburn-Mulwaree, and Queanbeyan-Palerang. Our Community is split across the boundaries of the State Goulburn and Monaro Electorates, and across the Commonwealth Hume and Eden-Monaro Electorates.

The Tarago Community is essentially a mix of farmers and graziers, those seeking a rural lifestyle with the latter being divided between retirees and those who commute for employment to and from Queanbeyan/Canberra or Goulburn on a daily basis. Retired Ex servicemen and women seeking a quiet lifestyle and it also includes people and families who have moved to the area for various health reasons.

Children commute to and from school in all directions: Tarago, Goulburn, Bungendore, Braidwood and Queanbeyan/Canberra via parents and buses or other forms of transport. These children are transported daily on all of these roads around the Veolia site and through the Tarago Community.

We are the Community who are going to be most adversely affected by the construction and operation of any suggested Energy from Waste (waste incineration) facility within the Woodlawn Eco Precinct (Southern Goulburn Mulwaree Precinct).

The timeframe of six weeks that the Tarago community received in order to provide constructive feedback and concerns was not reasonable, considering the gravity of the decision that was to be considered. This is especially so, given the amount of information in the EIS that required extensive research and consideration.

The Tarago Community has met on multiple occasions since the first information regarding the Incinerator project came out and at each and every meeting discussions were held regarding the project. Tadpai held a vote and received an overwhelming decision from the community that we were to object in the strongest terms to the Incinerator project going ahead!

Thus, in accordance with paragraph 1 of the NSW EPA Energy from Waste Policy Statement (Reference A) that requires Veolia or any other proponent to get and prove “*community acceptance to operate such a process has been obtained*”, and which is restated in the Veolia SEARs (Reference C): the Tarago

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Community, that Community most affected by Veolia’s proposed ARC does **NOT** give acceptance to Veolia or any other proponent permission to build and operate its proposed ARC or any other Energy from Waste (Waste Incinerator) within the Woodlawn Eco Precinct (Southern Goulburn Mulwaree Precinct).

The Tarago Community’s objection is well known, and is evidenced by:

- Tarago and District Progress Association Inc (TADPAI), on behalf of the Tarago Community (and not limited to):
 - writing to The Hon. Matthew Kean, MP, Minister for Energy & Environment on 27th September 2021 questioning the NSW Government’s social licence for approving EfW proposals and requesting NSW Government to conduct a plebiscite regarding the communities’ want for the use of energy from waste technology in the neighbourhoods;
 - writing to The Hon. Rob Stokes, MP, Minister for Planning & Public Spaces on 27th September 2021 questioning the NSW Government’s social licence for approving EfW proposals and requesting NSW Government to conduct a plebiscite regarding the communities’ want for the use of energy from waste technology in the neighbourhoods
 - Providing questions to Goulburn Mulwaree Council on 4th October 2021 to be put to the NSW Chief Scientist;
 - writing to Mr Richard Kirkman, Managing Director & Chief Executive Officer, Veolia Australia and New Zealand on 12th October 2021 objecting to Veolia building and operating a Waste Incinerator at Woodlawn, and requesting Veolia on behalf of the Tarago Community to withdraw its ARC proposal and proposed EIS;
 - writing to Mr Richard Kirkman, Managing Director & Chief Executive Officer, Veolia Australia and New Zealand on 9th November 2021 again objecting to Veolia building and operating a Waste Incinerator at Woodlawn, and again requesting Veolia on behalf of the Tarago Community to withdraw its ARC proposal and proposed EIS;
 - Writing to Ms Chang and Ms Stuart, NSW EPA, on 31st January 2022 objecting to the proposed Suez waste incinerator for Matraville - SSD-10373;
 - writing to Ms Mackey (CEO NSW Environmental Protection Authority) objecting to the Draft Regulation: Protection Of The Environment Operations (General) Amendment (Thermal Energy From Waste) Regulation 2021 on 15th March 2022
 - writing to The Hon. Dominic Perrottet, MP, Premier on 24th May 2022 pointing out the conflict between the use of waste incineration and the achievement of NSW Climate Change objectives;
 - writing to Hon Wendy Tuckerman and Ms Nicole Overall on 9th June 2022 in support of CATTI’s freedom of information request;
 - writing to Ms Mary O’Kane AC, Chair, Independent Planning Commission and The Hon. Justice Brian Preston SC, Chief Judge, Land and Environment Court of NSW on 20th June 2022 objecting to SSD-6236 TNG Eastern Creek Energy from Waste Facility
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- writing to Goulburn Mulwaree Council on 22nd June 2022 expressing local traffic concerns and seeking a consolidated traffic impact assessment encompassing the needs of all State Significant Developments using regional local and State roads;
- writing to Ms Kelly Lynch, Greater Metropolitan Water Sharing Plans, NSW Department of Planning and Environment on 16th August 2022 objecting to Veolia’s landfilling of toxic and soluble ash at Woodlawn and within Greater Sydney’s groundwater catchment area;
- writing to Ms Kelly Lynch on 17th August 2022 objecting to Veolia’s landfilling of toxic and soluble ash at Woodlawn and within Greater Sydney’s unregulated river (surface) water catchment area;
- numerous emails opposing Veolia’s proposed waste incinerator at Woodlawn and to the use of waste incineration generally; and
- now this Submission;
- The Veolia Community Liaison Committee (VCLC) advising Mr Richard Kirkman in person individually and collectively that the Tarago Community disapproves of Veolia building and operating a waste incinerator within the Woodlawn Eco Precinct (/Southern Goulburn Mulwaree Precinct);
- New incorporated community action group ‘Communities Against the Tarago Incinerator (CATTI) that exists specifically to oppose the building and operation of Veolia’s proposed Waste Incinerator.
- the Anglican Church, the Uniting Church and other church parishes expressing concerns and objections to the use of waste incineration, and in particular at Woodlawn;

The Tarago community has expressed concerns to TADPAI that the holding of an event does not constitute or form consultation, brochure distribution and advertisements in Sydney based papers also do not constitute consultation - Veolia has done both.

“The operators of an energy from waste facility will need to be ‘good neighbours’ – particularly if near a residential setting but also where there are workers in other facilities. This would apply to waste deliveries and operating hours, but most importantly with respect to readily available information about emissions and resource recovery outcomes.”

NSW Energy from Waste Policy Statement, page 3

Veolia at Woodlawn

The Tarago community doesn’t believe that the Veolia waste incinerator will be a good neighbour as it will dramatically increase the number of heavy vehicles on the current road infrastructure that is not rated to carry the heavy vehicle loadings that will be necessary, especially during the construction phase of the project. Also great concerns for public safety have been raised with Tadpai by the local community, thus

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there is a requirement for major road improvements before any construction work starts on any proposed local State Significant Development.

TADPAI also notes that Veolia does not comply with a number of the conditions within the approved consents; two examples being Veolia does not update TADPAI on a quarterly basis and Veolia rarely contacts people who submit complaints to either Veolia or the NSW EPA.

TADPAI believes that Veolia's lack of adherence to consent conditions at Woodlawn and its lack of transparency with the Tarago Community regarding its recent possible leachate breach and other minor issues that have arisen. TADPAI notes that the proposed site for the hazardous waste encapsulation cells (ED1), is also the site of the recent possible leachate contamination breach involving possible leakage to groundwater, that is Sydney's drinking water. And noting that Veolia did not disclose to the VCLC at its 29th September 2022 meeting that it had a leachate contamination breach that it had to report to the NSW EPA, the Tarago Community and the community and local government representatives on the VCLC only found out about this breach after a journalist published the breach in a print media are sufficient reasons in themselves for the NSW Government to not approve this proposed waste incinerator.

TADPAI notes the Woodlawn Eco Precinct's remoteness from emergency services and the time it will take for properly attired and equipped respondents to be on the ground addressing any hazardous/toxic incident that has occurred. And of the environmental damage that will occur through delayed response. TADPAI also finds it appalling that the presence of Develop and of miners being underground has not been addressed. The proposed waste incinerator is not kilometres from third parties, it is only (100-150 m) away from Develops mining tunnels and miners and around the same distance from the administration offices. Any explosion within the waste incinerator or associated storage facilities has potential to cause serious injury, possibly fatalities among the miners operating beneath the waste incinerator.

The smoke from any fire will not linger above the Woodlawn Eco Precinct, it will plume in whatever direction the wind takes it. If toxic, which is possible, the smoke could cause the Hume Highway, Federal Highway and other local roads to be shut down. Worst case scenario Toxic smoke could also force the evacuation of residents from their homes in Tarago, Goulburn, Bungendore, and other regional communities.

TADPAI recommends that the local RFS be upgraded to BA capabilities which they currently are not, So that they may be suitably protected in the event of a major event at the Veolia site as these are likely to be the first responders on scene, in response to any event.



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Veolia has not included in its EIS submission its aspirations to increase its annual Regional Waste volumes from 125,000 tonnes per year to 200,000 tonnes per year - this has been discussed at VCLC meetings.

TADPAI position based on community feedback is that there should be no further developments by Veolia within the woodlawn Eco Precinct until the existing odour issues are resolved fully and proven fully resolved over a 12 month period.

Waste Incineration does not come without risk both in terms of direct operational risks and indirect logistic risks. There are also the increased risks of the way of transportation and storage of fuels, chemicals and any possible hazardous waste.

The NSW Government and Veolia do not have the right to impose health risks on the Tarago and surrounding communities.

The NSW Government must ensure that Veolia, its clients providing waste to be incinerated and itself individually and collectively, have the financial reserves, insurance and capability to address any outcome of any class action.

In Conclusion the Tarago Community as expressed to TADPAI is a hard NO to the development of an incinerator of any kind in the Veolia Woodlawn site.

Yours Sincerely

Wayne Baynham

President

TADPAI

M: 0415 174 935

E: tadpaipresident@gmail.com