

6 December 2022

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The Director,

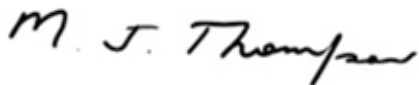
**Submission – Woodlawn Advanced Energy Recovery Centre (SSD-21184278)  
Objection to Proposal**

Thank you for the opportunity to comment in relation to the State Significant Development Application (SSD) for the proposed Woodlawn Advanced Energy Recovery Centre following the exhibition of the EIS for the proposal on 26 October 2022.

This submission should be considered as an objection to the proposal. A detailed explanation of why Council formed this view on the application is attached in Schedule 1.

Should you have any queries in relation to this preliminary submission please contact the undersigned, preferably by email at [Council@qprc.nsw.gov.au](mailto:Council@qprc.nsw.gov.au) with a copy to [Michael.Thompson@qprc.nsw.gov.au](mailto:Michael.Thompson@qprc.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. J. Thompson', written in a cursive style.

**M J Thompson  
Director Development and Environment  
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## **Schedule 1**

### **Details of Objections to Woodlawn Advanced Energy Recovery Centre Proposal (SSD-21184278)**

#### **1. *Proposed Methodology for Disposal of Waste is Inconsistent with Sound Environmental Principles***

Council objects to the proposal on the basis that the proposed model for dealing with waste is fundamentally flawed. The accepted hierarchy for dealing with waste as shown in Figure 1 below gives top priority to waste prevention, followed by re-use, recycling, recovery and finally, disposal. The hierarchy helps us rethink our relationship with waste based on five priorities ranked in terms of what's best for the environment



**Figure 1 – Waste Hierarchy**

The model used by the advanced energy recovery centre proposal falls into the least preferred level of waste management, being disposal. Generation of electricity is, at best, a bi-product of this process. The main business proposition for the incinerator is to provide a waste disposal mechanism (primarily) for Sydney's growing municipal waste problem. The business model for the facility, therefore, relies on the throughput of waste – the more waste, the greater the profit derived. The implications for waste volumes increasing at the facility over the 25 year lifespan of the facility is increased pressure on road and rail networks and higher risk of environmental damage and degradation through misuse (of road and rail services) or mishap.

Council believes this is an unsustainable methodology for managing waste for the following reasons.

- The technology is archaic – burning anything to generate electricity will inevitably result in greenhouse gas emissions and waste to energy incinerators produce more greenhouse gasses, particularly CO<sub>2</sub>, than gas-fired power stations, noting that methane generation is lower.
- Waste to energy incinerators disincentivise more sustainable use (and reuse) of materials and encourages the destruction of potentially useful materials.
- The proposed operation creates a financial incentive to continue to generate waste instead of finding genuinely sustainable ways to reduce it. It also undermines the economic incentive and viability of less harmful alternative technological and management approaches to manage waste.
- Much of the waste that would end up being burned at the facility could be recycled. The waste to energy incinerator does not contribute to the circular economy model that governments have indicated is one of their strategies to improve emissions targets.

- Given the business model is centred on the volume of waste the facility can process, Council believes there would be inevitable pressure on the facility to increase productivity. That means more trains and trucks from the source centres of Sydney, Queanbeyan, Palerang, and Canberra, which equates to more waste miles being accumulated. Train and truck contributions to environmental damage are well documented. More trucks, more trains, more greenhouse gasses, more environmental and infrastructure damage.
- Continued use of this technology is merely delaying the transition to less carbon-intensive power generation such as wind or solar. A better environmental outcome can be achieved by using the site to generate renewable energy through solar and/or wind power. The amount of energy that the project would generate for the grid is relatively low at 30 megawatts a year. When the adverse impacts on the environment, people and livestock are considered, this is not, on balance, a good proposition.
- Moving waste long distances to burn undermines efforts to reduce the key contributing factor in global climate change, namely rising greenhouse gas emissions.
- Long-distance train transportation also generates greenhouse gas emissions which can be avoided by managing waste close to the source of its generation.
- While transportation by train is preferable to road transportation for long-distance movement of non-perishable items, long-distance transportation entails a risk of transport accidents and spillage of waste materials and attendant risk of polluting the environment. This risk can be avoided by managing waste close to where it is generated.

## **2. Equity Considerations**

Council objects to the proposal on the basis that the advanced energy recovery proposal is not equitable. In particular it is Council's view that:

- It is contrary to the principles of equity to transport waste from a large population centre to a rural / regional area for processing, burdening the receiving community with the waste of another community.
- Waste should be treated and disposed of in the place where it is generated. Treating waste at the location it is generated would avoid burdening these communities with the adverse impacts of this technology.
- Western Sydney residents opposed a similar incinerator for their district because of the perceived risk to human health, and in response, the project was dropped. Residents of the Southern Tablelands deserve to be given the same consideration.
- It is unfair to burden the community of Tarago and district with further adverse impacts from waste management by approving a new operation with a 30-year life span. While it is noted that this is waste that would otherwise be placed in landfill at the site, the proposal extends the life of the landfill capacity at the site and therefore the long term impacts that the landfill site has.
- Council understands that many of the proposed waste to energy projects in NSW are in small regional centres, some distance from the source of the waste proposed to be incinerated and with fewer opportunities for employment. Imposing such facilities on communities which are relatively economically disadvantaged compared to larger regional population centres is contrary to the principles of equity.
- The approval of a waste to energy incinerator in the region adds a compliance burden to environmental protection agencies and, potentially, local governments and may have an impact on resources that are notably scarce.

### **3. Past Performance of the Proponent**

Council objects to the proposal because it has a view that Veolia/Woodlawn have a poor corporate record of responding to local residents' concerns about their current Woodlawn operation. Residents have been given numerous assurances over many years that air quality will improve. In the view of many residents it has not. This poor record undermines any assurances of safety that Veolia may give in relation to their proposed new facility. Veolia already suffers a major trust deficit in the community as a result of their inability to meet community expectations around the waste transported to the existing facility. The complaints log shows an unenviable record of breaches and dissatisfaction. Council is concerned that the added pressure to generate profit from waste at the facility in order to make a return on investment for a relatively short lifespan (30 years) might act as a disincentive for the company to adhere to the highest possible environmental standards.

Treating waste at the location it is generated would avoid burdening these communities. Residents already complain about strong odours from the Woodlawn bioreactor which are of such intensity that they cannot remain outdoors.

### **4. Transport Impacts**

While it is noted that the proposed quantities of waste being treated at the Woodlawn facility as a whole are not proposed to change (i.e. waste going to the incinerator is being diverted from the bioreactor), and therefore it can be argued that the proposal generates no additional traffic movements, there will be a temporary increase in heavy vehicle movements during the construction phase. The local government authorities responsible for maintenance of the Tarago and Collector Roads, should be compensated with a contribution toward maintenance of these roads for damage caused by the additional construction traffic.

### **5. Environmental Concerns**

Council also objects to the proposal until it is satisfied that the following concerns have been addressed:

- The incineration of waste generates bi-products that pose a risk to human health and livestock and to the environment which is comprised of broad-scale agricultural land, small human settlements and some widely dispersed farm dwellings, and the forests, woodlands and grasslands of the Southern Tablelands Region, its waterways, including Lake George, and native fauna.
- The incineration of waste generates pollutants during operation and residual long-lasting toxic waste that would need to be stored on-site in a geologically unstable location for the foreseeable future.
- While it is recognised that the proponent intends to have in place treatment methods that deal with the potential bi-products, ash and pollutants produced by the incineration process, Council requests that in assessing the application the consent authority scrutinises the proposed treatment methods in some depth to ensure that they remove the unacceptable risk that residual pollutants will be released into the atmosphere which in turn will pervade rain water storage, fodder for stock, chickens and other food produce.