

SUBMISSION

In response to

Environmental Impact Statement Prepared for

VEOLIA, a French Multinational Company,

Relating to

SSD – 21184278.

Submission dated
6th December 2022.

This Submission has been prepared by Josephine Beverley.

PREFACE.

This document raises **several objections** to the proposed Woodlawn Advanced Energy Recovery Centre from information set out in the **SEARS, Requests for SEARS, and EIS** prepared for Veolia, the proponent.

The information contained in this objection is based on fact, but not always referenced, as we have only been given **30 business days to reply to the EIS** which Veolia took more than **12 months** to compile with the assistance of many professional individuals and business organisations.

The people of this community and associated with the objection to this project, are rightly angered that they have not been afforded a similar consideration of timeline to respond to a complicated set of volumes presented by the proponent.

Put simply, this behaviour is termed **discrimination**.

At no stage of this proposed development has the needs of our community, businesses and environment been fairly considered.

The State Government of New South Wales is directly and wholly responsible for the protection, health, welfare and safety of the Tarago Community and its environment.

A waste Incinerator approval will place the Tarago Community at considerable risk on the multiple issues raised in this objection and I therefore call upon the Department of Planning to reject this proposal for those reasons.

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SUBJECT MATTERS DISCUSSED IN THIS SUBMISSION.

These subjects may, or may not be related to the EIS, but are relevant to the impacts on community, business and environment.

LOCATION AND DETAILS OF LANDHOLDER.

BUSH FIRE RISK.

UNDERSTOOD PERCEPTIONS OF EIS AIMS AND PURPOSE.

A.C.T. LEGISLATION.

CONSULTATION REQUIREMENTS.

IMPACTS OF PROLONGED EXPOSURE TO TOXIC CHEMICALS ON AGRICULTURE ACTIVITY.

PROPERTY AND LIVESTOCK ACCREDITATION, ASSURANCE AND GUARANTEE.

INDUSTRY CAPITAL INVESTMENT.

AIR QUALITY RISK DUE TO BUSH FIRE.

RELATIONSHIP BETWEEN REGIONAL COUNCILS AND N.S.W STATE GOVERNMENT.

ABOUT VEOLIA.

HISTORY OF OTHER APPLICATIONS FOR WASTE INCINERATORS IN N.S.W.

EXISTING LEVELS OF ENVIRONMENTAL CONTAMINATION NOT ADDRESSED.

HISTORY OF THE AREA SURROUNDING THE VEOLIA ECO PRECINCT.

SUITABILITY OF EXISTING AGRICULTURAL AND ENVIRONMENTAL CONDITIONS IN SURROUNDING AREA OF ECO PRECINCT.

MANDATORY CONSIDERATIONS FOR THE PROJECT.

SOLUTION TO WATSE MANAGEMENT FAILURES.

LOCATION AND DETAILS OF LANDHOLDER IN THIS SUBMISSION.

I am the Landholder of properties 3499 Mayfield Road, Tarago and 3317 Mayfield Road, Tarago.

The landholding is described as a Rural Property of approximately 1000 Acres (405 ha)

Like many properties in the district, ours is an existing long term agricultural enterprise undertaking various Primary Production activities.

With a **dse** of 2.5, the animal carrying capacity of this acreage is two thousand, five hundred (2,500) animals.

Water storage facilities on this property include:

More than 20 dams for both livestock and human use.

In excess of 9 large water tanks with the largest tank capacity at 110,000 litres.

Natural Water Course: Chain of Ponds.

Our property and associated Primary Production business is located directly south of Lake Bathurst, which is about 8 kms from the Veolia Eco Precinct.

Agricultural produce for our property includes:

Fattening cattle for meat (local and export quality)

Merino Sheep breeding for wool (export)

Sheep breeding for meat (local and export quality)

Cereal Cropping for human consumption and

Cropping for animal feed.

The quality of our produce is reliant on **strict Biosecurity and organic status requirements** that is **guaranteed** by our business.

In addition to this biosecurity commitment, our property is managed under regenerative philosophies which includes a programme with a substantial acreage of conservation areas set aside.

The property is set up to support and enhance the fragile nature of the surrounding environment and ecology so that the longevity of our agricultural region is assured.

BUSH FIRE RISK.

Populations living in urban localities cannot be expected to understand the dangers that bush fires present.

The recent bush fire event of 2019-2020 was a traumatic experience for anyone living in a rural landscape.

The speed and ferocity of bush fire can be terrifying, and loss of life, property and livelihood are typical issues faced in regional and rural areas.

The proposed Veolia waste Incineration facility is to be located in a rural landscape setting. The surrounding area of the Eco Precinct is typically a landscape that presents a heightened level of bush fire risk.

This is due to the abundance of fuel loads readily available on the surrounding unimproved land.

The rural community is fully aware of the severe and potentially uncontrollable fire risks that exist in our locality and expect that, at best, the fire risk is always “moderate”.

With respect to this common knowledge, it then seems irresponsible to consider putting an industrial waste facility in a rural landscape.

By comparison, it would be a **much safer risk** to locate a waste Incinerator facility in an urban area.

PERCEPTIONS OF EIS AIMS AND OVERALL PURPOSE OF THE PROJECT.

The EIS describes the **purpose** of Veolia’s proposed development to be the construction of and Advanced Energy Recovery Centre and it is understood that an AERC. involves the construction of a high temperature Incinerator which will burn waste and then provide electrical energy back into the grid.

The energy produced is to provide power to 40,000 homes.

The major principle adopted with this proposal is that energy production is the “green” trade-off for the negative environmental impacts created with high temperature waste incineration.

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Development companies and Government bodies love to use this method of “legitimising” projects that pose a problem with compliance of legal guidelines particularly with regard to other people’s land, property livelihood and environment.

The morality of this process is highly questionable as the fact remains that after the trade-offs, the guidelines are still not complied with.

Essentially the development proposal adopts the position that it is acceptable to contaminate the humans, animals, environment, air, water and soil with toxic chemicals and trade that off with providing energy to 40,000 homes.

The Veolia AERC proposal is an example of such a development process

BUT WITH ONE EXCEPTION:

The EIS refers to the complicated process of energy being generated but does not describe what detailed logistics are involved in transferring energy through a grid that is neither planned nor constructed.

The EIS can only make the comment that Veolia is discussing the proposal with Essential Energy, and that it may have to, or is going to, prepare an additional EIS to set out the details of the proposed connection to the grid.

As there is no finite plan or costing for energy production contained in the EIS, the incinerator project then must be rejected as an Energy project, which in turn then puts the approval for a Waste Incinerator at serious risk because of the numerous negative environmental impacts associated with its construction and subsequent operation. There is no positive trade-off without the ability to produce energy.

Consequently, the project cannot be termed as an Advanced Energy Recovery Centre.

In essence, there is no definitive process described or yet undertaken to design processes for the creation of Easements and Transmission lines to complete the Waste to Energy part of the EIS.

There is also no projected costing or consultation pathway identified for transmission access over private land.

The failure to adequately quantify this part of the development now renders the present EIS just an application to operate a Toxic Waste Incinerator.

The exclusion of the detail relating to the connection to grid also renders the EIS referred to in this submission to be fundamentally flawed, and thus must be rejected.

A.C.T. LEGISLATION.

Recent A.C.T. Government Legislation has banned “Waste-to- Energy” incineration for Energy Production and proposes legislating the right to healthy environment.

Residents of the A.C.T. have also petitioned to call on the A.C.T. Government to lodge a submission to oppose the Veolia AERC project in Tarago N.S.W.

The A.C.T. Government’s new waste policy says:

“An important element of this policy is that it respects the waste hierarchy. Waste reduction, reuse and recycling of materials will take precedence over energy recovery applications. Thermal treatment of waste including incineration, gasification, and pyrolysis will not be permitted in the A.C.T.”

“The A.C.T. Government has concluded that there are better ways to approach the management of waste in the A.C.T., including through an increased focus on waste minimisation.”

The above policy and general approach is so much more progressive, responsible and ultimately cleaner than the alternative existing policies of the State Government of N.S.W.

By comparison, it seems the N.S.W. Government cares little for the precious land and constituents in their provenance and I am appalled by their attitude.

The knowledge of what occurs over the border in the very near region of Canberra frankly makes me feel embarrassed to be a resident of N.S.W., particularly given that I contribute to the Primary production of this State.

It seems the policy makers of N.S.W. live in the dark ages and I can only hope the forthcoming election might somehow present an opportunity for N.S.W. policy makers to catch up with the rest of the Country’s ability to deal with public issues affecting human health.

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“CONSULTATION” REQUIREMENTS.

The meaning of the word “consult”:

“To **seek** information or advice from someone.”

The SEARS states that

“You must **consult** with surrounding local landowners, businesses and stakeholders.”

Contrary to this direction, Veolia has made absolutely **NO** attempt at any time to consult with us in our capacity as a landholder and producer to discuss potential impacts of agricultural and business concerns.

Information days, letterbox drops and “meet the experts” are **not compliant** means of consultation. The kind of information offered at these forums is typically generic, vague and mostly misleading.

I have done some research with regard to Veolia’s consultation activity.

There are at least 50 agricultural landholders in the surrounding area of the Eco Precinct who, like me, have not had any discussion or contact **from Veolia**.

These 50, or so, landholders are responsible for the management of more than 55,000 ha of potentially adversely impacted land.

In addition, I refer to Veolia’s registered letter to “dear neighbour” and dated 25 October 2022. Which informed the community of the public exhibition of Veolia’s EIS.

I did not receive a registered letter for property 3317 Mayfield Road, Tarago, nor did other residents in Burrabinga Road, Tarago.

Proof that Veolia has once again paid little respect to our community.

It is **not our job** to seek information from Veolia, but **it is their job** to consult with us.

VEOLIA HAS FAILED TO CONSULT.

This must be viewed as a serious breach of the SEARS direction

It also indicates the lack of respect this foreign company has for the residents of Tarago and the surrounding district.

IMPACTS OF PROLONGED EXPOSURE TO TOXIC CHEMICALS ON AGRICULTURAL PRODUCTS.

Our property supports the production of both beef cattle for meat and sheep for meat. The accredited carrying capacity for this property is 2,500 animals. Other activities include sheep for wool production and some cropping.

PROPERTY AND LIVESTOCK ACCREDITATION, ASSURANCE AND GUARANTEE.

The property and produce are Meat and Livestock Association and Livestock Production Assurance accredited and operate under the Integrity Systems Property Risk Assessments requirements.

We have recently received an email from Integrity Systems which identifies concerns and impacts related to livestock contamination and WARNS that:

“Contaminated livestock presents a food safety issue and can impact the reputation of your business and livestock marketing options.”

“Livestock contamination is a critical situation that can cause a host of food safety issues along the supply chain.”

“If your property or livestock are exposed to **on-farm physical contaminants or chemicals**, you may be subject to liability for costs incurred by processors and even refusal of sale. If contaminated meat enters the food supply chain, it can impact access to export markets and cause ongoing reputational damage for Australia’s red meat industry. Managing contamination risks on your property is a requirement of Livestock Production Assurance (LPA) accreditation.”

“Understanding Persistent Chemicals.

Persistent chemicals are substances that stay in the environment and may become concentrated within humans and animals following prolonged exposure. They can have serious adverse impact on health, the environment and trade.

Persistent chemicals break down slowly. Contaminated areas may need to be managed for decades.”

The rural industry publication email goes on to explain:

“If livestock are found to be contaminated with unacceptable chemical residues or physical hazards, they are not fit for **human consumption**. As a result, you may not be paid for the livestock and face legal liability for the costs incurred by processors and the rest of the

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supply chain. In addition, a food safety issue for Australian red meat can impact your business, the consumer as well as the industry market access and reputation.”

Integrity Systems also WARNS :

“**Any** exposure to physical contaminants should be declared on your National Vendor Declaration at time of movement or sale.”

Integrity Systems identify specific chemicals such as “lead, arsenic, and cadmium.” The presence of these heavy metals in the food chain is deemed unacceptable.

Lead, arsenic and cadmium are all identified as chemical emissions contained in the EIS.

EFFECT OF CHEMICAL EXPOSURE ON ANIMALS.

There are recent studies available that show that animals exposed to Dioxins and Furans are impacted by changes to their hormone systems and to foetus development. It also highlights a decreased ability to reproduce and a suppressed immune system.

EFFECTS OF CHEMICAL EXPOSURE ON HUMANS.

It must also be considered that food contamination affects a far wider range of humans than just the local community.

Contamination of the food chain affects the population in general.

It is commonly acknowledged and accepted that most people have already been exposed to various levels of Dioxins and Furans, and that these chemicals are accumulative in humans.

It is also noted that research indicates the primary source of exposure to Dioxins and Furans in humans is the result of eating contaminated food.

What we **do know** is that these food chain exposures are the cause of serious life threatening diseases such as cancer.

The agricultural community has recognised food contamination as a serious concern to human health.

Veolia has not recognised or taken this food security concern seriously in their pursuit of Incinerating Rubbish.

This is indeed a high cost to pay for the Incineration of rubbish from Sydney and the EIS must be therefore considered to be substantially flawed.

The EIS makes reference that after “modelling scenarios” and “assumptions” are reached they “predict” the effect of animal contamination to be negligible.

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The information does not fully explore the many levels of long term persistent exposure to toxic contamination in relation to animal products.

Agriculture is a science, but the EIS contains no scientific evidence that can be relied upon to guarantee our food security

WOOL PRODUCTION.

Persistent prolonged toxic chemical exposure to sheep and wool products poses not only a health and food safety risk to animals and humans, but also, a health risk to humans who handle sheep.

Sheep husbandry involves constant physical contact with sheep.

The EIS identifies that small toxic particles are a product of the Incineration process, and these particles will be present in the air.

Prolonged exposure of these toxic chemicals results in wool contamination.

Farmers and shearers not only breathe the contaminated air, but also constantly handle the contaminated wool in the processes of shearing, crutching, drenching etc.

A discussion with the **shearers** that we contract to work with our 1,500 sheep have already recognised that shearing sheep with wool that is contaminated with toxins and furans as described in the EIS, presents an unknown and **unacceptable level of health risk** with additional subsequent impact on livelihood.

The activity of shearing sheep for wool produce and animal health then becomes seriously impacted without the ability to find shearers to work on our property.

This scenario is the same for all sheep farmers and wool producers in the surrounding area of Tarago and will result in the collapse of our wool enterprise, as shearers will have the choice of working in other regional environments free of contaminants.

The same scenario applies to all agricultural products from the Tarago district.

No amount of explaining or providing figures that predict toxic levels can alter the fact that our products will be contaminated when compared with other agricultural regional produce.

Buyers of our sheep, cattle, grain and wool know it is contaminated by dangerous ongoing toxins. That fact is now well accepted with the present attention being given to the publication of the Veolia EIS.

Buyers understandably want to source their product from a market that is free of toxic contaminants.

The obvious impending loss of agricultural business will be catastrophic, and the loss of land value then follows.

Veolia's proposed Incinerator provides further contamination impacts to our land, animals, air and water, which places our products at a serious disadvantage compared to other **uncontaminated agricultural regions.**

Our aim as producers must be to continue to market products of the highest organic quality that are free of contaminants to achieve an acceptable level of food security.

Veolia has failed to address this problem adequately in the EIS.

Perhaps if they had consulted the agricultural community, they may have realised this aspect of the proposed project to be a **major flaw** to the process of safe development.

INDUSTRY CAPITAL INVESTMENT.

Local Agriculture compared to Incinerator Waste Facility.

Veolia to their detriment, has also grossly underestimated the extent of established, successful agricultural activity which exists right next door to their precinct.

The EIS boasts Veolia's initial Capital Investment figure for this Incinerator project to be around \$600 million but have not considered that existing agricultural infrastructure is at risk of collapse as a direct result of the impacts of contamination.

The Veolia investment of \$600 million is substantially less, by comparison, with existing agricultural industry.

At present the surrounding agricultural area of exposure to contaminants is in excess of 55,000 ha (135,850ac.)

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Consider then: The going rate is currently around \$7000 / acre, thus land value would be somewhere **around \$950,950 million. Then add current stock holdings of approximately 350,000 animals (available dse) value unknown plus agriculture infrastructure (market value unknown).**

The total existing agricultural Capital Investment figure reached is then well in excess of **\$1 billion.**

This begs the question, does it make good economic and environmental sense to place a Veolia garbage facility and Incinerator directly in the middle of an established, successful agricultural industry with landholdings and produce worth more than the proposed Veolia project?

The approval of a Waste Incinerator facility and subsequent pollution and contamination of the environment and ecosystem will certainly have a devastating impact on the established and successful Agricultural Industry in the Tarago area.

The Local Economy, directly surrounding the Eco Precinct, contributes to the second biggest export industry, behind Mining, in Australia, that being Agriculture (wool, grain and food exports.)

The most important element of this industry is the **guarantee of products that are free from all pollutants.**

Feeding the world has to be an uncontaminated safe process and the reputation of Australia's wool, food and grain export industries must be protected.

Veolia has failed to understand the gravity of a development which plans to add pollutants to an environment which has to guarantee it is clean and safe for food production.

It is therefore totally foreseeable that **any negative and future impact (directly or indirectly)** of environment, air, water and soil on agricultural lands will be understandably met with the **need for compensation for an industry worth more than the project itself.**

AIR QUALITY RISK DUE TO BUSH FIRE.

The EIS shows that the proposed construction of a waste incinerator at Tarago will negatively impact the air quality of the region continuously. There are other negative air quality impacts present in the environment that should be considered, one of which is bush fire smoke.

The impact of bush fire smoke is more prevalent in rural settings due to the abundance of combustible fuel readily available in the landscape.

The EIS rightly makes reference to Bush Fire impacts within the Eco Precinct and the safety of the Eco precinct is paramount to the safety of the surrounding Environment.

It has not however addressed the potential impact of air quality with regard to the **combined impact** of emissions from existing and/or external sources. The introduction of a bush fire event poses a natural detrimental effect on air quality with regard to reduced levels of oxygen and the presence of ash particles in the atmosphere. The combination of these additional natural air quality impacts needs to be considered when proposing to further impact air quality with emissions such as dioxins and furans.

The likelihood of this scenario occurring is not probable but certain, as this rural community is subject to the threat of bush fire at all times in dry weather.

During the recent catastrophic bush fire season of 2019 - 2020 the air quality in the Tarago region was severely impacted for a period of 3 months. The air was filled with ash particles which made it hard to breathe and see for any distance. Ash was present in nasal passages and there were times when a mask was necessary, particularly when riding quad bikes and operating farm machinery.

Bush Fire is a natural event so it is understood there is no available mitigation that can remedy the situation. During this time, the Tarago community also had to put up with the air pollution effects from the Woodlawn Bioreactor.

The EIS does not consider the combined impacts of naturally occurring severe air quality events such as bush fire together with the projected impaired air quality from predicted Incinerator emissions.

Bush fire can also starve the air of oxygen.

Unfortunately, the risk of bush fire is **not** remote, it is an event every rural region plans for every year.

The EIS does not address the very real concern of added negative impact on air quality presented by combined pollutants both natural and introduced.

RELATIONSHIP BETWEEN REGIONAL COUNCILS AND N.S.W. STATE GOVERNMENT.

The proposed Veolia project is located under the jurisdiction of “State Significant Land”, created by N.S.W. Government legislation.

This legislation allows for the State Government to overrule Regional Council planning schemes and zoning.

Despite this, Goulburn Mulwaree Council, Queanbeyan Palerang Regional Council and Yass Valley Council have all unanimously opposed the Veolia project.

Indeed, it is hard to document any resident, business or body that is in support of the proposal.

It follows that if the proposal is located in a regional area, then a regional response is required via Goulburn Mulwaree, Queanbeyan Palerang and Yass Valley Councils rather than a remote decision made in the city.

Our State Government representatives have discriminated against those that live in regional areas of N.S.W. and State Significant Laws are not representative of regional residents and businesses.

ABOUT VEOLIA.

Excerpts from the Veolia Mission Statement.

“Veolia Australia and New Zealand (ANZ) is a \$3 billion business whose **‘purpose,’** put simply, is to enhance the environment we live in to ensure that humans can continue to thrive.”

“We are here to provide renewable energy and **clean water** for our municipal, industrial and commercial customers”

“We show up for our customers; sharing in their challenges and celebrating **our joint successes.**”

“We guarantee long-term results for **our customers.**”

The words above clearly state where Veolia’s interests lie and that is with their customers. The proposal to build a **Toxic Waste Incinerator at Tarago will certainly not enhance the environment we live in, nor will it ensure that humans can continue to thrive.**

Veolia’s proposed project is not in any way reflective of their mission statement, in fact, it is misleading and deceptive.

The EIS also does **not plan** to provide for **clean** water, contrary to Veolia’s mission statement, also a misleading mission statement.

In essence, **the mission statement is flawed** and a typical example of companies that make grose “greenwashing” statements to convince statutory bodies that they are enhancing the environment.

This project, as described in the EIS, seeks to change big toxic particles into small toxic particles, which are then expelled into the atmosphere, polluting the air.

But that’s not where it ends, the particles then are added to other essential environmental elements such as water and soil.

None of this approach is either responsible or acceptable environmentally and is not supported by scientific or factual data.

The EIS is based on opinions sourced from “predictions” and “assumptions,” and the “scenarios” are predominantly reflections using data from overseas locations that have no similarity to the proposal and are thus inappropriate.

VEOLIA’S OPERATIONAL RECORD IN THE TARAGO WOODLAWN PRECINCT.

Veolia currently operates a waste disposal facility located at the Woodlawn Mine site.

Fact: The local community and environment has been constantly subjected to numerous **ongoing EPA violations.**

Fines applied to the violations do little to change the appalling behaviour of Veolia, which is a French multinational company. Veolia displays a contempt for the Australian environment in which it operates.

It is simply an insult to expect that a community and region would find the corporate behaviour of Veolia in any way acceptable, and it is not unreasonable to conclude that this company cannot successfully manage the existing operation within the guidelines of the EPA requirements.

The Tarago community already bears the heavy price for the residents of Sydney with the processing of 40% of Sydney waste and in addition to this, suffers the impact of **ongoing effects of illegal breaches such as Lead poisoning, foul odour and leaking garbage containers.**

Further to that, Veolia expects that EPA breaches together with leachate spills into the local natural water courses is an appropriate corporate business behaviour. The proof of this statement is borne out by the fact that Veolia continues to violate EPA laws on a regular basis. They are happy to pay the fine rather than fix the problem.

And still more, Veolia then wants to pollute the air, soil and water with highly dangerous toxic elements 24 hours a day, 7 days a week for the next 30 years.
How can this be a good idea?

It therefore follows that any further or future development proposal by Veolia should be viewed as beyond the capacity of their expertise, given the current level of mismanagement.

HISTORY OF OTHER APPLICATIONS FOR WASTE INCINERATORS IN N.S.W.

Research shows there are at least three previous applications in N.S.W. for high temperature incineration facilities that have been rejected.

In the 1990's a high temperature waste incinerator operated by Waverley Council was closed down because of serious concerns regarding the harmful combustion emissions, including carcinogenic dioxins.

In 2018, a proposed waste to energy incinerator at Eastern Creek was opposed by Blacktown City Council, the EPA and the NSW Department of Health.
The Eastern Creek development was also a state Significant Development.
The Independent Planning Commission cited concerns over human health risks and impact on air and water quality.
The IPC refused consent because it was not in the public interest.

In 2021, a waste to energy proposal at Matraville was withdrawn due to similar concerns stated in the Eastern Creek development, also a State Significant Development.

it is obvious from the numerous refusal decisions issued by Government that this kind of technology is not an appropriate means of garbage disposal due to serious human health concerns.

The same concerns are evident with Veolia's Tarago Waste to Energy proposal.

It would be a mistake to assume that the same high risk technology, which has now been repeatedly rejected, is suitable for imposition on regional communities and activities.

EXISTING LEVELS OF ENVIRONMENTAL CONTAMINATION NOT ADDRESSED.

Veolia plans to emit what it calls "negligible" levels of dangerous Dioxins and Furans into the local environment.

The information in the EIS assumes that there are **no existing pollutants** present in its analysis and subsequent "negligible" outcomes.

The following reasons are an explanation as to why Veolia's EIS has failed to adequately define the full extent of potential negative and environmental impacts.

The information contained in the EIS "predicts" and wrongly "assumes" the impact being created by the emissions from the Proposed Incinerator to be the **total impact** on the environment. It is genuinely only indicative of **one aspect** of negative impact.

This naïve assumption is a mistake because the scenario does not take into account the already existing pollutants presently being emitted by Veolia's Woodlawn Bioreactor facility.

The extent of these existing pollutants is virtually unknown and is only accounted for when EPA breaches are reported.

The community is subjected on a regular basis to foul odour, (which indicates the presence of toxic chemicals) and ongoing EPA violations.

For example, there is no explanation as to the chemical composition of the odour breaches.

It is obvious this odorous smell is a telltale sign of air contamination.

There are leachate breaches that also contribute to other existing levels of pollution.

From these regular violation events we must assume there to be an undefined level of environmental negative impact already existing.

Simple scientific based logic would suggest that, when calculating the **future** negative contamination impact, Veolia should at least include the levels of existing accumulative environmental contamination.

This vital base information should then be added to the "predicted" negative impacts and then assessed.

Veolia unfortunately is responsible for the existing Woodlawn Bioreactor which is already polluting the environment and The Proposed Incinerator project which predicts it will also pollute the environment.

The lack of trust now engendered in the Tarago and surrounding community is a direct reflection of Veolia's poor operational and management record.

This company has proved it cannot be trusted with existing Woodlawn Bioreactor activities and it would be surely considered negligent endorse or reward Veolia with further projects.

HISTORY OF THE AREA SURROUNDING THE VEOLIA ECO PRECINCT.

The Veolia Eco precinct Woodlawn is an **industrial mine and waste site** located on agricultural plains to the south of Goulburn, 5 kms from the town of Tarago, 8 kms from Lake George to the west and Lake Bathurst to the North East.

The history of the Goulburn Plains and area surrounding the Eco Precinct dates back some **194 years**, when William Faithful established "Springfield" in the winter of 1828.

Springfield is only one of many enterprises which makes up the **dominant agricultural landscape** of the Goulburn Plains.

These plains are situated in the local region renowned for excellence in agricultural produce which includes Merino sheep breeding, over many generations. Also, sheep for meat, and sheep for wool, both export quality.

Other agricultural activities include beef cattle and a variety of crops both for human and animal consumption.

TARAGO HISTORY.

The Lake Bathurst area which includes Tarago was discovered in April 1818, and settlement is dated from 1826.

Local historic buildings include "The Loaded Dog", established in 1848, Tarago Public School, 1878 and Tarago Railway Station 1884.

This information documents the established history of agricultural land usage in the surrounding area of the Proposed Project.

Veolia, by comparison, has only been part of the local community for less than 20 years, and during that time has managed to contaminate our environment on numerous occasions.

Comment:

The Big Merino in Goulburn is there for a reason.

The N.S.W. regional area of Goulburn is famous for producing Australia's best quality sheep, meat and wool.

The proposal to allow an incinerator that manufactures toxic waste is directly risking the integrity of the region and its agricultural environment.

NATURAL GEOGRAPHY OF AREA SURROUNDING THE PROJECT PROPOSAL.

The most important element in the Australian environment is water.
Australia is typically a dry and arid continent.

Clean drinkable water must be protected at all costs for us to be able to sustain life and food production, particularly as populations increase and the ability to produce food becomes paramount.

Climate Change heightens the challenge to provide the world with enough clean uncontaminated food for the future of this Planet.

Veolia describe the Tarago area as highly suitable for garbage disposal.
The criteria for this notion revolves around financial, economic and logistic suitability,
However,
the physical, geographical and environmental characteristics make such an activity an extremely inappropriate proposal.

Firstly, the surrounding area to the Eco Precinct is almost exclusively an agricultural food production region.

Secondly, the Eco Precinct is located almost directly in the middle of three very large natural groundwater systems.

These are Lake George to the west, Lake Bathurst and The Morass to the East.

All of these water bodies are situated dangerously close to the Eco Precinct Proposal, not to mention the river system (Crisps Creek and Mulwaree River) which is now directly exposed to a **leachate problem by favour of Veolia.**

It is obvious that the location of the existing Woodlawn waste facility and the proposed Incinerator present a highly dangerous and fragile risk to the local ecosystem and environment, therefore making such a development totally unsuitable.

In addition, no serious long term groundwater study has been undertaken with regard to the water security of Lake George, Lake Bathurst and The Morass, all of which are at a premium water level at the moment (2022).

The development of the original site as a Mine provided little to no impact (environmentally) on the surrounding area, but subsequent development with the implementation of a rubbish tip to fill in the mine and now a proposed Toxic Garbage Incinerator has taken the risk of environmental contamination to an alarming level.

Therefore, it is obvious that the surrounding environment cannot be fully protected.

The EIS does not fully appreciate the potential negative impact of siting a Waste Incinerator in such close proximity to three major Groundwater systems and rivers that supply water to Sydney catchment.

SUITABILITY OF EXISTING AGRICULTURAL AND ENVIRONMENTAL CONDITIONS IN THE SURROUNDING AREA OF THE ECO PRECINCT.

The locality of the Tarago, Lake Bathurst, Goulburn Plains districts are agriculturally favourable because of the following environmental and economic conditions:

Climate.

The climate has well defined seasonal changes which allows for a variety of agricultural activities.

Rainfall.

The annual average rainfall of the Tarago district is in excess of 500mm., however rainfall so far for 2022 has already exceeded 820mm.

Soil.

Soils are generally classed as loamy and highly suitable and arable for a wide range of agricultural cropping.

Natural watercourses.

There are several watercourses existing in the local region including Crisps Creek which flows into the Mulwaree River then continuing to join the Wollondilly River at Goulburn. This river system is part of the Warragamba Dam Catchment area which is the main water catchment for Sydney water supply.

Chain of Ponds watercourse feeds into the south shore of Lake Bathurst.

Groundwater Systems.

This region is also supported by Lake George, Lake Bathurst and The Morass.

These lakes are also part of a large groundwater system which is a **dominant** and **fragile** environmental feature.

Geographical Characteristics.

Again, the local regional elements are highly suitable for agriculture as the predominant land use consisting mostly of cleared, gently undulating topography.

Agricultural Markets.

The region is well serviced by quality established export livestock, wool and grain **markets**.

The long-term effects of a toxic waste Incinerator as described in the EIS places the major agricultural export business at serious risk by damage caused to the water, soil and air which are crucial elements of production.

MANDATORY CONSIDERATIONS FOR THE PROJECT.

Table 5.4 of the EIS: Mandatory Consideration for the project referencing the State Environmental Planning Policy

"Sydney Drinking Water Catchment Development consent cannot be granted unless there is neutral or beneficial effect on water quality."

This statement is interpreted as a guarantee that Sydney Drinking Water will in no way be negatively impacted.

There must also be no negative impact of water quality for the Tarago community.

The EIS acknowledges that local drinking water is wholly sourced from roof runoff into water tanks and "predicts" adding toxic contaminants to the water 24 hours a day, 7 days a week for a period of 30 years is negligible.

No accurate scientific evidence is available for exposure to these chemicals over a period of 30 years currently in Australia.

Veolia does not know what the impact will be, it can only "predict."

Predictions are not scientific facts and do not satisfy the SEARS requirements.

SOLUTION TO WASTE MANAGEMENT FAILURES.

The creation of waste has been mainly proliferated by the addiction of Western Societies to packaging.

This addiction was not always the norm, in fact I can remember a time in the 1950's when the world disposed of very little waste.

A small metal garbage bin about the size of a 60 litre plastic bin was all that was required for a week's household rubbish disposal.

A "garbo" was able to jump off the back and swing the contents of the bin into the truck. A one- man job for each bin, not that heavy!

These days, household rubbish for a week is contained in at least 3 bins, all at least double the size of the original metal container.

We have moved from being relatively minimalist in our habits to a huge world problem in the space of 70 years, all of which I have observed.

This madness has to stop!

The solution to the ever increasing problem of waste is to stop making it.

Instead of incinerating waste and polluting environments, Governments need to encourage waste reduction programmes starting with retail packaging with incentives backed up by progressive legislation.

All Governments are faced with the same problem and will continue to face the same problem until we turn it around.

We have already moved to embrace cleaner sources of power, and waste reduction is the next global challenge for this Planet.

It is not a progressive political policy to incinerate rubbish and the cost to the environment, which is irreplaceable, must be considered paramount.

UNCONTAMINATED ENVIRONMENT, they're not making any more of it!

