

Ms Sally Munk
NSW Department of Planning and Environment.

Submission on Veolia's Waste to Energy Proposal.

13th December 2022

Dear Sally

Thank you for the opportunity to respond to the Environmental Impact Statement prepared by Veolia.

Ellendon Pty Ltd owns and manages a 3000 Ha sheep, cattle and cropping property 11km south of the proposed project. The property includes large areas of native vegetation and fronts onto Lake George.

Ellendon objects to the proposal in its current form. Please find below areas of concern in the proposal that Ellendon would like addressed.

1. **Review the need for the plant.** The proponent claims that incineration is more sustainable than landfill. This does not appear justified by the GHG Analysis which has a major error. The proponent's claim of improved sustainability emissions rests entirely on the obviously false assumption that the 'emissions intensity' of the proposed plant is LESS than the future emissions intensity of the National Electricity Market.

The proponent's use of historical data for NSW emission intensity ignores the rapid changes in the grid. It;

- a. runs counter to the Government's own policy in decarbonising the electricity sector including by constructing Renewable Energy Zones,
- b. ignores the stated intention of all NSW coal-fired-power stations to retire well within the ARC lifetime,
- c. ignores the multitude of committed renewable plants, and
- d. ignores the interconnectors with other states which are planned or in construction. These interconnections will lower emissions intensity within NSW.

Ellendon requests that the proponent be required to adopt a reasonable future grid emissions intensity in line with AEMO's Step Change Scenario in the 2022 Integrated System Plan. This is the most current and authoritative source for future grid configuration and the plan which the Government uses for its own policy.

If a revised GHG analysis finds, as it certainly will do, that the plant will in fact increase emissions when compared to the next best option of regional landfilling, then the project should be rejected. To proceed would be incompatible with the Government's own net zero policies and the nation's international obligations. It would risk harm to the environment and human health unnecessarily.

It is important to note that Sydney, unlike many cities in the world, may have abundant options for further landfilling. We request that the proponent reviews other landfilling opportunities, including continued use of the Woodlawn pit and other mined out areas such as the Hunter Valley, to properly test the need for the less sustainable option of incineration.

2. **Properly Defining Minimum Efficiency.** Incineration plants are deemed to be more acceptable to the public if they include energy recovery. To enforce this the Government policy includes a minimum efficiency. Ellendon requests that this efficiency limit is enforced such that the public gets the energy in a useful form and at a useful time. Ellendon recommends that efficiency is measured as the

(electricity sold to the grid during times of positive prices)
(energy embodied in the waste stream).

Negative prices (which are increasingly common as renewables increase market share) are a signal that the wholesale market is saturated with renewable electricity. Pushing more electricity into the system at this time will force renewables out of the market and require the Government's Consumer Trustee to procure additional storage to move the proponent's electricity into a higher demand period (see the NSW Electricity Roadmap). This is not in the public interest. Rather than relying on other electricity market participants to subsidise this plant, the proponent should include sufficient storage so that it only exports when the market demands increased electricity supply. Use of the above efficiency definition achieves this.

Alternatively, Ellendon requests that the Government address this concern directly. It should require the proponent to study the likelihood of zero or negative prices and revise its plans to include energy storage. This storage should be sized to ensure export is not required during oversupplied intervals and the stored energy is exported into high demand intervals.

3. **Failure to address the SEARS.** The project's SEARS include;
 - a. "identification of any infrastructure upgrades required off-site to facilitate the development...." and

- b. “details of existing transmission infrastructure constraints.... and all required mitigation measures”.

Presumably the Secretary shares some of the concerns expressed above – i.e., the public expects the energy to be deliverable to the grid.

Neither of these SEARS have been adequately addressed. First, the proponent admits the 66kV line needs upgrades. These upgrades should be properly disclosed to the public at this stage (they are surely known in some detail by either the proponent or Essential Energy). Second, any possibility of curtailment (which is unfortunately common) should be ruled out via the publication of a dynamic grid study inclusive of likely new-entrant renewable and storage projects in the region. Again, this is needed to meet the SEARs request for constraints to be documented and mitigations explained. The proponent presently states that these matters are the domain of Essential Energy but this ‘responsibility shift’ does not address the Secretary’s (or Ellendon’s) concerns.

4. **Best available technology to reduce harmful emissions.** Ellendon is naturally concerned that an incinerator close-by will release substances harmful to the natural environment, it staff, crops and livestock. Ellendon has reviewed, to the best of its ability, the technology proposed and its comparison with other technology, but it is clearly an area requiring considerable expertise. Ellendon in no way wishes to cast doubt on the capabilities of the expert consultants, but this is such a vital issue Ellendon requests that the Government engages its own independent expert review to ensure the complete trust of the local community. If this project is to be approved, Ellendon seeks Government reassurance that the risk to its water, land, animals, staff, and produce is minimised via the very best scrubbing, encapsulation and emissions mitigating methods.

Thanks for the opportunity to respond. Ellendon is disappointed that it must object to this proposal and hopes that the concerns above can be addressed such that the proposal is more acceptable.

Yours truly

Luke Osborne
Director, Ellendon Pty Ltd