

## OBJECTION - Modification 7, Reverse Osmosis Plant, Veolia Woodlawn Facility

I object to the proposed modification for the following reasons:

1. Veolia are yet to provide a long-term plan for the Woodlawn site. Despite failing to properly plan for leachate management, despite proposing to build additional leachate dams and extend the MBT shed, despite proposing to build an incinerator and hazardous waste dump, and despite now proposing a ROP, they are still unable to provide a long-term plan for site development. It defies belief that an industrial site of this magnitude is allowed to continue haphazardly proposing developments without a long-term site plan to protect the environmental security of the surrounding region, towns and agriculture. A long-term site management plan should be provided for all ongoing site activities and potential future developments prior to any approval of this proposal or any further development proposals.
2. There was a complete absence of community consultation. A standard definition of consultation (Cambridge Dictionary) is “the process of discussing something with someone in order to get their advice or opinion about it”. At no point has Veolia asked for community ‘advice or opinion’ on the details of this project. In fact, at no point has Veolia even made the community aware of the details of the project.

Veolia notified nobody that this modification was on exhibition. The Woodlawn Community Liaison Committee (CLC) was not informed this modification was on exhibition. It’s a simple matter to email and inform the CLC so that they can pass on information to the community. The CLC received no notice of the exhibition. I sat in an online meeting last week and again last night where Veolia told us how important they believe community consultation is, yet they have completely neglected to allow the community any consultation on this project. And worse still, in their ROP application Veolia have provided misleading and untrue statements regarding the alleged ‘consultation’ conducted for the ROP.

Veolia state that they consulted the CLC on the ROP and the CLC was in favour. Of the two CLC meetings referenced in their application, at one the slides on the ROP were completely skipped due to time constraints and no discussion was held. At the other (November 2023 - almost a year prior), Veolia briefly explained they were proposing a future ROP and that there would be more information available in the future. The minutes state: *“Proposed modification to put in an additional water treatment step = >50% ultra pure water for beneficial water e.g. for use in water carts, irrigation to the onsite farm, washdown processes, operational processes onsite and the remaining goes to leachate dams”*. (These minutes aren’t even up yet on the website despite Veolia being notified they are missing.) There was never any discussion of the detailed requirements and operations of such a facility, and the CLC were told that information would be available later once studies were done.

Additionally, the statements in the application noting that Veolia sought community input through the December 2023 edition of the Tarago Times are untrue. In this edition of the Times, the exact information presented by Veolia was:

*“The initial water balance update identified the potential for additional treatment of already treated water onsite with a new Reverse Osmosis plant built within our current water treatment plant compound. This would purify the water to a quality consistent with Australian Drinking Water Guidelines, which is a benchmark of very high quality. This drinking quality water can then be used*

*in a range of processes at the eco-precinct, including in water carts on our roads, irrigating small plots for fodder, and supplying water for operational processes to further reduce our borefield usage. We are assessing the feasibility of building this Reverse Osmosis plant at the existing water treatment plant onsite. It is an extremely capital intensive project, but we are confident that in the long-term, the beneficial reuse of our own water will bring the best environmental and business outcomes.*

*As with any change to a State Significant Development, a great deal of testing by third parties and supportive analysis would be required to do this. We have lodged a scoping letter with the Department of Planning and Environment to progress through the early stages of getting those requirements before putting together a modification proposal. Using a Reverse Osmosis plant to treat already treated water is extremely expensive and rarely undertaken in the waste industry, but we are pursuing it because it is consistent with the objectives of further water resilience, water security and compliance onsite as well as the circular economy principles."*

I note that:

- none of this information calls for community input on the project;
- all of this information indicates that studies and planning for the project are yet to be completed; and
- all of this information implies there will be more information to come.

It would be completely reasonable for anyone interested in learning more and/or providing feedback on the project to assume they could wait for these studies and detailed information to be made available.

Contrary to the information in Veolia's application, community consultation on this modification was non-existent. The woefully inadequate 2 paragraphs provided to the community 8 months prior to the exhibition period will set a dangerous precedent if DPHI allows this to stand as adequate community consultation. Given the scope of the project and the potential for harmful impact upon local waterways, pastures, groundwater, agriculture and the Sydney Water Catchment, the proposal should be withdrawn and a period of proper and adequate community consultation arranged.

3. Veolia have a history of environmental mismanagement and breaches. Their latest environmental fine was for \$30,000 for an offence that the EPA deemed 'entirely preventable'. Environmental damage is systemic problem (or systemic habit perhaps?) within Veolia worldwide, and we see and smell firsthand evidence of it here in Tarago on a regular basis. The only way to offer the community a modicum of confidence in the management of an ROP would be for Veolia to be unable to be involved in any manner in the day-to-day running and management of it. There should also be extensive and all-encompassing real-time monitoring and camera feeds available for the EPA and community. Veolia should also be required to operate their current facilities for a minimum period of 12 months with zero environmental licence transgressions before being permitted any further developments onsite.

4. ROP is an expensive endeavour. Veolia have demonstrated on many occasions over the past 20 years of operation at Woodlawn that they will skimp on investment input and avoid repairs/improvements to their equipment/operations to achieve greater profit. All this is done at the expense of our community and the local environment. If Veolia plans to go ahead with this proposal, an EPA financial assurance should be established to ensure the proper funds are available to implement the project, allow for any potential ongoing and future improvements, and ensure there is sufficient funding available for environmental remediation in the likely

event that problems arise.

5. The odour modelling is incorrect. Why are Veolia assuming 6 OU outside the boundaries of their property when their licence conditions clearly state odour is not permitted outside their property boundary? This appears to be an attempt to normalise and gain acceptance for the continuous odour problems arising from their operations that affect local areas around Woodlawn for more than a 20km radius. All odour modelling should be redone using the basis of 0 OU beyond the boundaries of the property and the proposal re-exhibited with the correct information.

6. Have they modelled the worst case scenario rain events? It doesn't appear so. Veolia has, in almost every single article and community communication for the past 3 years constantly emphasised 'La Nina' and blamed it for everything from their odour to their leachate problems. It seems uncanny that they can suddenly forget to include this in their modelling for a water treatment plant designed to help manage their leachate problems. The modelling should be redone and the project exhibited once the correct information is available.

7. For a proposal based in an agricultural area and the Sydney Water Catchment, there doesn't appear to be due attention paid to the impact of spraying this water on pasture and its potential impact on surrounding land, waterways and groundwater. There's no pasture management plan, insufficient advice on the effect on the soils and what minerals are likely to be leached from the sprayed pastures and moved elsewhere, and insufficient information on how this will be tested and managed. If the project is anticipated to even minimally affect groundwater and/or local rainfall, a detailed assessment on the potential agricultural impacts should be completed. Once these details are available the project should then be placed on public exhibition and the relevant agricultural bodies notified.

8. Veolia seem unable to decide whether they are proposing one or two reverse osmosis plants. Contradictory information is provided in the application and appendices making it unclear how many ROPs Veolia is proposing. It seems unfathomable that they have submitted an application without:

- a) knowing exactly what they plant to build, or
- b) being able to differentiate between the numbers "1" and "2".

This should be clarified and the project exhibited for public consultation with the correct information.