

## **Submission re: Gunnedah Waste Facility—Application Number SSD-8530563 (objecting)**

Wando Conservation and Cultural Centre Inc is based at Maules Creek approx. 70 kms from Gunnedah; we engage in research and monitoring to protect the environment and the communities in an area encompassing Narrabri- Boggabri- Gunnedah. Our concerns about aspects of the Gunnedah Waste Facility and our experiences with a number of Projects/Developments in our area cause us to **object** to the proposal currently being considered.

### **An example of ‘Modification (or Approval) Creep’**

As a result of experience with a number of other Development Projects, Wando is acutely aware of the phenomena popularly known as ‘Modification creep’ and of the invariably deleterious effects of this phenomena of changing Project parameters on our natural and man-made environment. An example of such ‘creep’ is provided by this Project.

*See SEARs p. 4 A SEARS has been previously issued, on 15 October 2019 (SEARS 1380), for a waste facility handling up to 90,000 tonnes per annum of waste on the Project Site. An EIS in support of the proposed waste facility is currently in preparation and is well advanced.*

*Mackellar Equipment Hire Pty Ltd now wishes to increase the capacity of this waste facility to handle up to 250,000 tonnes per annum of waste, thus triggering the need for a SSD application and a revised SEARS to be sought.*

Although the EIS for the currently proposed facility of 90,000 tonnes is ‘in preparation and well advanced’ the proponent is already seeking a totally unacceptable 2.8 increase in tonnage.

On p. 104 of the EIS the first alternative to this Project is presented as the ‘do nothing’ scenario- this is disingenuous: the proponents already have an EIS in support of a 90,000 tonnes per annum waste project on the site *which is currently in preparation and is well advanced*. This, smaller, project would be much more in keeping with the environment and local conditions (and the size of the site) and not predicated on the gathering of waste products from across the State and their transportation to Gunnedah.

Wando’s concern is that the proponent’s enthusiasm for the NSW Government’s policies as expressed in the EIS (p.102)

*The development is consistent with the NSW Government's direction in achieving the targets in the Waste and Avoidance and Resource Recovery Strategy 2014-2021 and In particular: Avoiding and reducing the generation of waste. Increasing recycling. The above strategy targets recycling rates by 2021-22 of 80% for construction and demolition (C&D) waste and 70% for commercial and industrial (C&I) waste. Diverting more waste from landfill to alternative uses, such as recycling and energy recovery.*

could see the process culminate in the type of waste incinerators currently being fought by communities across Sydney ‘creeping’ into Gunnedah.

### **Process Transparency**

Wando is concerned that the Project was only exhibited on-line; many local residents were consequently denied the opportunity to inspect and consider the Project and its implications. Covid19 restrictions, except during periods of actual lock-down, were not so stringent as to preclude proper, public exhibition (and even public meetings).

## The nature and volume of waste

Wando is concerned that the amounts of specific waste should be more highly regulated than it is currently. This is particularly the case with waste such as the salts to be produced should the Narrabri Gas Project reach production.

## Transport and traffic issues

The EIS observes (p. 103) *It (the facility) is readily accessible via major transport links, in particular, the Kamilaroi Highway, that (p. 104) The proposed waste facility would have minimal impact on local intersections and would have minimal impact on local and regional roads and (p. 142) The project site is within close proximity (to Gunnedah) and has ease of access to major transport routes. Moreover, the proposed waste facility will have good road access that does not pass through urban residential or other sensitive areas such as schools and hospitals.* The Figure on p. 56 of the EIS shows: *The Project Site is highly accessible to regional markets, including Sydney*

Such observations raise a number of considerations:

1. the volume of traffic is not **relatively low** as is claimed in Appendix D
2. the streets of Gunnedah are not designed for the type of vehicle shown as part of the fleet expected to cart material from as far away as Sydney or Brisbane.
3. while there are a number of diagrams of traffic turnings into the facility there is no consideration of that waste which comes from sources which would necessitate travelling **through** Gunnedah
4. **there is no consideration of the major transport route provided by the railway-** this is a significant oversight.
5. The Crown Lands Division Response to SSD-8530563 Request for Input to SEARs observes *The proponent has indicated in the request that the proposed development will be accessed via Torrens Road and Quia Road. Records indicate that these roads are currently Crown roads. They will need to be transferred to Gunnedah Shire Council prior to project approval or commencement of works.* What are the implications of such a transfer for the rate-payers of Gunnedah?

## Destination of waste

Wando is concerned that detailed consideration is not given to the question of waste which cannot be recycled or for which the process is considered too expensive. We are aware of industrial waste being disposed of in environmentally unacceptable ways in the region and seek guarantees that any waste not capable of recycling will not find its way into, for example, the voids left by mining projects.

## Water matters

1. The EIS fails to provide details of the amount of water required by the various parts of the Projects operations. What are the implications for the town and its water supply of the Project?
2. While not subject to flooding (as the EIS) observes in the sense that the area is inundated from the River, we have observed water lying in the area during periods of substantial rainfall
3. What becomes of 'dirty' water after it is detained in the detention pit? (SEARs p. 42)

**Compliance:**

Wando's experience has been that in such developments matters such as air quality, sound, dust, noise, traffic and water usage pose a basic dilemma: monitoring and matters of compliance fall to under-resourced, over-stretched community groups. It was only through concerted, time consuming action on the part of environmental groups that finally, in April 2020, Whitehaven Coal was fined \$120 000 for dumping hazardous waste at Narrabri; see [here](#).

We urge that the Project not proceed until the Department of Planning, Industry and Environment can guarantee that Gunnedah will not become the dumping ground for waste from across eastern Australia.