



North West Protection Advocacy  
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2<sup>nd</sup> February 2021

**To: NSW Dept of Planning Industry and Environment**

ATTENTION: Katelyn Symington  
[Katelyn.Symington@planning.nsw.gov.au](mailto:Katelyn.Symington@planning.nsw.gov.au)

Dear Ms Symington,

**OBJECTION Gunnedah Waste Facility – Application Number SSD-8530563**

North West Protection Advocacy is a community advocacy group based in Coonabarabran. We regard the proposed waste facility at Gunnedah as directly relevant to the concerns of our organisation and object strongly to the project.

We object to this waste facility.

We also object to the vague and inadequate information provided by the proponent which does not permit proper assessment.

NWPA sees this facility as being intended for disposal of Santos mining waste. This waste stream needs to be fully assessed if it is going to be present otherwise it must be written out in the conditions should this facility be approved.

Based on our brief chance to peruse the EIS we have identified the following that causes us to object to this proposal:

- Vague and non-descript terminology occurs frequently throughout the EIS such as words like “tentatively estimated”, “including but not limited to”
- There does not seem to be any clear end-destination for the waste that will be processed through the facility
- In respect to Contaminated soils: on page 11, we contend that the origin of these contaminated soils should be disclosed before a decision is made
- No information is provided as regards to Naturally Occurring Radioactive Material or NORM.

- “The capital investment value (CIV) for the proposed new waste facility is \$3,909, 374 excluding GST- refer Appendix ? For details.” However, the details are not provided.
- It appears, although not disclosed by the proponent, that the intention of Mackellar Waste is to provide a disposal place for crystallised brine waste originating from the coal seam gas operations of Santos Gas. We object to the treatment of such waste as “general waste” and argue that the NSW Waste Classification Guidelines are unfit for the classification of crystallised brine waste. If the consent authority approves this waste destination, it must include explicit conditions that no brine waste should be disposed of there.

The proposed location, in proximity to other businesses, including the Gunnedah livestock sale yards, and the town of Gunnedah is a danger also to the human population and a grave risk to public health both through the storage and transportation of the salt waste.

NWPA is concerned about the cumulative impacts of dust, noise, vibration, visual amenity and road safety that approval of this waste facility would entail.

We are aware that the proponent has an diverse working relationship with Whitehaven Coal Ltd the owner of the land where the waste facility is proposed. Whitehaven Coal is currently under an ongoing Clean Up Order from the NSW EPA due to contamination of the Narrabri Shire landfill in 2019.

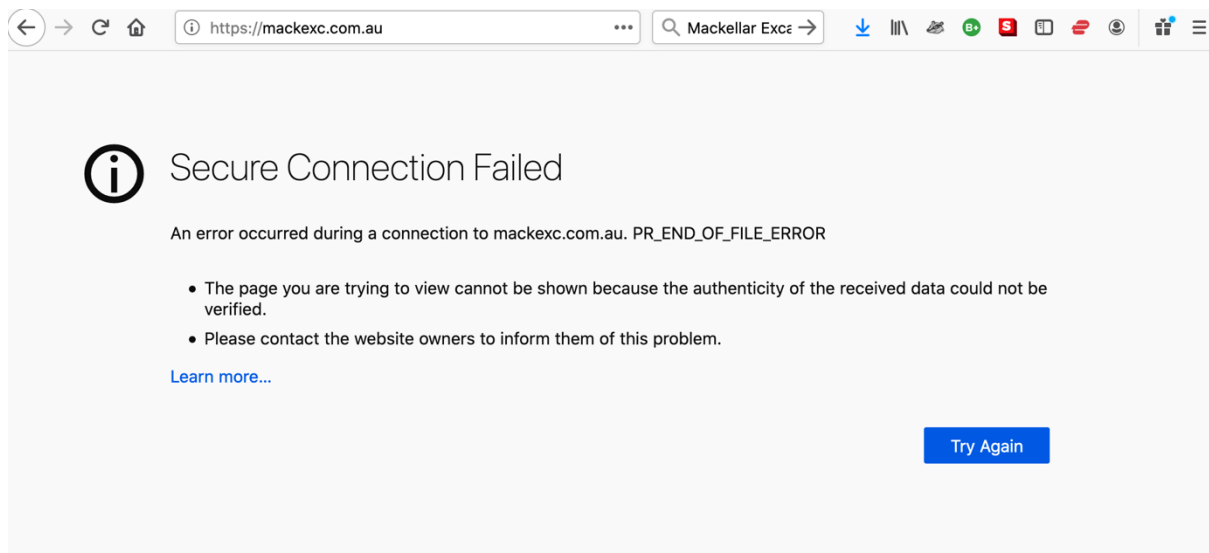
We have seen the problems caused at the Narrabri Landfill by illegal dumping of mining waste and apparatus and are concerned that similar could occur at Gunnedah.

**Whitehaven Coal is a wholly unsuitable landowner to host a waste facility.**

Finally, community consultation for this waste facility has been lacking in that no public meeting has occurred. No hard copies of the EIS have been made available and the exhibition period was over the Christmas holiday period.

We have been attempting to access the proponents website since we were made aware of this proposal 24 hours ago. We have been unable to obtain any background information on Mackellar Excavations because the website is down. It continues to be inaccessible despite NSW Planning tweeting otherwise yesterday.

<https://twitter.com/NSWDPIE/status/1356415127910670339?s=20>



We have tried to contact NSW Planning about this issue via email and to seek an extension to this process so that we can respond in a meaningful way.

The lack of transparency about Mackellar waste in that its own website is unavailable to the public for scrutiny.

On behalf of NWPA  
Johanna Evans