



## **Sport – Bringing Our Community Together**

President: Gill Shepherd, 315 Cullulla Rd, Tarago, NSW 2580, Ph 02 48494221  
All Correspondence to: The Secretary TSAI, 315 Cullulla Rd, Tarago, NSW 2580  
All Enquiries to : Secretary, Neil Shepherd phone 02 48494221  
or by email to [tsaisecretary2580@gmail.com](mailto:tsaisecretary2580@gmail.com)

Mr Chris Ritchie  
Planner  
Department of Planning and Environment

### **Modification Request to Woodlawn MBT and Crisps Creek Intermodal (MP\_06\_0239 MOD2 and MP10\_0012 MOD3)**

The Tarago Sporting Association Incorporated (TSAI) thanks you for providing the opportunity to comment on the response to submissions lodged by Veolia Environmental Services.

TSAI objects to the proposal.

### **Reasons for Objection**

#### **Odour**

The Odour Assessment report indicates that the assessor is uncertain as to the effect of the SRF on odour escaping from the Woodlawn Facility. Odour escaping from the facility is currently in breach of DA consent conditions. Odour escape has been a major issue for the community since the site began operations and many in the Tarago community believe has been the source of consistent breach of the consent conditions. The latest Odour Audit indicates that there were 20 reports of odour escaping the facility in the period up to February 2018, but analysis conducted by the Tarago & District Progress Association indicates that many community members have given up reporting odour escape as they believe that Veolia ignores these reports. The reported incidents of odour escape are mentioned at the Veolia Liaison Committee, but details of the area affected by the incident report is not disclosed, as Veolia say that they would be in breach of the reporters privacy. The current recording process doesn't ask the reporter if they want their information to remain private, or if they are happy for the information to be made available either to the VLC or to the wider public.

It should also be noted that:

- in the latest published Odour Audit that the auditors were in the Tarago area for 2 days and identified instances of odour escaping the facility on both days. They did not contact the community to ask when other odour escape incidents have occurred in the period covered by the Audit Report.
- The use of odour diaries was implemented about 3 years ago, but Veolia have discontinued this important community feedback mechanism.

Previous consent conditions were amended to include a requirement that an Odour recording and reporting process be established. This process is not functioning as required, as when community members report an incident of odour escape, it was expected that Veolia would contact the reporter to advise them of the cause of the odour, and action being taken to address the issue. This response action by Veolia is not happening in all instances. Searches of the Veolia website under specific keywords of Woodlawn Bioreactor Odour Reporting, Odour Reporting, Woodlawn Odour Reporting, Woodlawn Odour and even the name of the report Woodlawn Bioreactor

Complaints Register do not reveal the weekly odour complaints register which contains the odour complaints/reporting data. It is only by knowing *exactly* what to search for that you can find the complaints register (under the subheading of Reports and then sub keywords of Woodlawn Bioreactor) and it is not listed on the Woodlawn Bioreactor page. Interestingly the word odour is missing from all the titles of these reports. It is desirable that the website be easier for the community to access the information without extensive searching and page scrolling.

**Community Liaison.** Three members of the Tarago Sporting Association were members of the Veolia Liaison Committee, one since the committee began and the other two for a term of two years. At least 2 of the 3 members believe that the Veolia Liaison Committee (VLC) is not working.

Example 1. This modification has been in planning since late 2017. In the period since late 2017, there have been 3 VLC meetings, and the possibility that an SRF was being considered was not mentioned in any of the 3 VLC meetings.

Example 2. The same situation as above occurred with a Development Application for a Solar farm lodged with Goulburn Mulwaree Council. Again this proposal was not mentioned in any VLC meeting.

Example 3, Veolia made a business decision to route trucks from the South of Collector Rd to Tarago via Kings Highway and Braidwood Rd rather than use the approved route Bungendore Rd to 'manage the quantity of waste travelling along the Bungendore Rd'. The community assumed that this was to ensure that Veolia could report that they hadn't reached the tonnage limit forcing road upgrade. At the February 2018 VLC meeting I asked for clarification of the rules around waste travelling by road. No information was forthcoming from Veolia. In the May 2018 VLC meeting after our own investigation, it appeared that Veolia had not met the consent conditions, and I asked them to check the consent conditions and then recalculate the waste quantity received from the south of Collector Rd for the previous year, based upon the revised interpretation of the consent conditions. While Veolia have advised that they have begun negotiations with Queanbeyan Council on road upgrade, I do not know if they have recalculated the waste tonnage for the previous year or advised the Department of Planning of the revised figure.

## **Conditions to be imposed if Department makes the decision to approve development**

### **Odour**

The original Development Application for the bioreactor was based upon an assumption that the operators would be able to prevent odour from escaping the site. This assumption has proven over the years to be incorrect. The current modification application odour report states that the additional odour impact cannot be determined until after the SRF is operating. This means that we could have the situation where the SRF begins operating, the community is impacted by odour and we spend years trying to have Veolia fix the issue.

The Odour reporting process needs to be modified to ensure that the reporter receives advice about the source of their odour complaint and action being taken to address the issue in all instances.

Reported odour information must be made available to the community in real time, rather than waiting for the odour complaints register to be update within 7 days.

To address the privacy issues which are used to limit discussion in the VLC, an online form and mobile phone application in addition to the current phone recording system should be developed to allow recording of odour incidents. This system would have a question asking which, if any, personal details the reporter is comfortable to share with the VLC or the wider public.

For reporting processes, the area surrounding the bioreactor could be segmented so that reports from people who wish to remain private can be shown without revealing their personal details.

The Tarago & District Progress Association have already built an online recording system and reporting system, so these systems are not impossible to build.

#### **New consent conditions**

1. If after operation commencement of the SRF, that if an incident of odour escape is identified outside the bioreactor site, that processing at the SRF be shut down until the source of the odour escape is identified and corrected.
2. That the odour reporting process develop an opt-in process of publication of some personal information (eg incident area/location) to the VLC or to the wider community.
3. That the odour reporting process be developed as a online and mobile phone application in addition to the current phone reporting process
4. That reports of odour incidents be reported to the community in real time, while protecting privacy where the reporter requests that.

#### **VLC**

The VLC is not working for the community, as issues raised are not addressed in a timely manner.

#### **Consent Conditions**

1. That the current VLC model be scrapped in favour of the model currently preferred by the Department of Planning, where an Independent Chairperson is appointed from a panel, and the chair is responsible for running the meetings and capturing minutes and action items to ensure that correct minute recording is done and items of business arising are addressed in a timely manner.

#### **Other**

#### **Consent Conditions**

2. That where limits or specific conditions or limits are mentioned, that the Veolia not be allowed to self regulate those conditions and that the Secretary be the responsible for approval and overseeing that conditions have been met.

Yours Sincerely



Neil Shepherd  
Secretary  
Tarago Sporting Association Incorporated