

**Submission  
No 662**

## **INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES**

**Name:** Mrs Josephine Beverley

**Date Received:** 31 October 2025

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## SUBMISSION

In relation to NSW Parliamentary Inquiry Legislative Council Select Committee on Proposed Energy from Waste Facilities.

31 OCTOBER 2025.

Submission prepared by  
Josephine Beverley.

Email:

Phone:

Land Manager

Approx. 1000 acres engaged in safe, bio secure food production.

Stock includes 2000 sheep, wool and meat.

100 beef cattle, and

cropping to support livestock.

Rural business accreditations:

ABN

Livestock Production Assurance Programme (LPA)

Meat Standards Australia Producer

MSA Licence No.

Meat and Livestock Australia (MLA).

Shareholder: Australian Wool Innovation.

Member: Long Water Agricultural Association Incorporated (LWAA).

## ACKNOWLEDGEMENT TO PEOPLE PAST AND PRESENT, LIVING AND WORKING ON THE LAND.

Subsequent to and in addition to, and including the Ngunnawal, Gundungurra, Pejar, and Ngambri Aboriginal custodians, are the working, tax paying people who are the past and present caretaker custodians of the Land.

These people (Australians) also own the Land by law and are Primary Producers who work the Land to provide Australians and others with the most important commodity of our Nation...FOOD.

Primary Producers have a history of caretaker land inheritance which goes back more than 200 years.

They paid for the Land with hard earned money on which tax was paid and is continuing to be paid.

In congruence with Aboriginal culture, the present custodian landcarers too, have the right to protect the Land, Waters, Skies and Natural Resources of N.S.W.

This connecting culture of past and present custodians too goes deep and strong.

The Big Merino

Goulburn

The largest land use area of the Goulburn Mulwaree Shire is Rural farming which produces FOOD for New South Wales, Australia and export internationally.

NO ENVIRONMENTALLY SAFE FARMS MEANS NO FOOD.

## CONTENTS OF SUBMISSION.

This submission deals with the subjects related in the Terms of Reference as set out to the Legislative Council on 6 August 2025.

The Terms of Reference in this inquiry are applied to both the Tarago and Parkes Energy Recovery Facilities.

My submission applies to matters relating to the SSD 21184278 Veolia Advanced Energy Recovery Centre, located at Woodlawn Mine, Tarago.

My property is located less than 10km to the East of the Woodlawn Mine.

## TERMS OF REFERENCE

(a) the performance of the technologies proposed for the Tarago and Parkes Energy Recovery Facilities as compared to leading thermal technologies employed in “state of the art” facilities internationally, noting such technologies as proposed are not employed anywhere else on the Eastern seaboard

(b) the spread of the emissions predicted and the quality of emissions to be generated

(c) health impacts from currently operating older technology waste incineration as compared to the proposed newer technology

(d) impacts on human health including on regional town drinking water, rainwater harvesting and soil contamination

(e) the impact on agriculture locally and across the wider region

(f) alterations to the Parkes Special Activation Precinct specifically in relation to the proposed Energy Recovery Facility in that region

(g) impacts of waste-dumping over a number of decades in the Tarago region

(h) the methodology of emission monitoring employed by leading large scale waste- to- energy facilities in Australia and across the world

- (i) alternative solutions to reduce and manage residual waste produced by Greater Sydney, and
- (j) any other related matters.

#### PREFACE:

The community, stakeholders and farming enterprises of Tarago and Lake Bathurst wish to thank and acknowledge the Committee members for their time and work relating to this Inquiry.

Hon. Nicholas Overall MLC, Chair. Nationals,  
Dr. Amanda Cohn MLC, Deputy Chair. The Greens,  
Hon. Mark Banasiak MLC. Shooters, Fishers and Farmers Party,  
Hon. Sarah Kaine MLC. Australian Labor Party,  
Hon. Natasha Maclaren–Jones MLC. Liberal Party,  
Hon. Peter Primrose MLC. Australian Labor Party,  
Hon. Rod Roberts MLC. Independent  
Hon. Emily Suvaal MLC. Australian Labor Party.

To put this Inquiry into perspective, the NSW Government needs to grasp the reality that waste disposal is fast becoming the largest problem facing this planet and NSW is not excluded from exposure.

To date, Government has kicked the can down the road by refusing to acknowledge the potential impacts on human health and environment that is caused by lack of adequate and appropriate planning laws and guidelines.

An example of the warning signs was clear to see in 2024, when several parks and public spaces in Sydney were exposed to asbestos contamination.

The EPA responded with prosecution and fines that don't match the serious potential damage to human health and environment (HHE).

It is hoped that NSW Government can act responsibly to mitigate the waste problem whilst simultaneously putting into place laws that are aligned with HHE protection standards that are already existing internationally.

Solving a waste problem should not involve any level of negative impact for human health and environment (HHE) as these two paramount elements are irreplaceable.

Because they are irreplaceable, they cannot be regarded as negotiable, traded off, or integrated in any way.

HHE and safe food security must be protected at all costs as the survival of NSW future generations depends on these criteria.

It is incomprehensible to imagine that the NSW Government would place more importance on the location of a garbage waste facility at the risk of health impacts and permanent environmental damage.

It is also pointed out that as there are many renewable power sources becoming available, the need for a waste disposal facility to be connected to energy seems futile now.

Governments are obsessed with EfW/WfE.

We need to remain singularly focussed on the main problem, safe waste disposal.

The energy component has to be questionable, as it only appeases the notion of a “circular economy” principle, which is at the expense of hidden and unaccounted environmental impacts.

Surely it is feasible to consider solving the waste problem as the primary concern which simultaneously achieves zero impact on health and environment.

Alternative separate renewable energy projects achieve clean energy goals independently already.

To summarise:

It’s not about achieving a circular economy, it’s about waste disposal together with the incorporation of sustainable HHE.

(a) the performance of the technologies proposed for the Tarago and Parkes Energy Recovery Facilities as compared to leading thermal technologies employed in “state of the art” facilities internationally, noting such technologies as proposed are not employed anywhere else on the Eastern seaboard

The “state of the art” technology details for Veolia’s Woodlawn Waste from Energy facility was presented in the EIS (prepared by EMM) and lodged in 2022.

By Veolia’s own admission, their EIS was prepared over more than an 18month period.

That timeline places the technology and research, modelling, scenarios and assumptions accessed for the EIS somewhere around 2020.

The EIS, prepared by EMM presented predictions for an Incinerator based on existing international models mostly operated by Veolia in Europe and the U.K.

The EIS failed to draw attention to the already world-wide existence of more progressive scientific research which identifies the potential damage that incineration causes to the environment.

Instead of a balanced and truthful scenario of incineration waste management, Veolia presented the view that an incinerator operating at 850 degrees C would be safe to operate in the Tarago region for the foreseeable future (about 25 years).

COMMENT:

Putting the existing Woodlawn operation and future incinerator proposal into perspective, the community regards the EIS (provided by Veolia) as nothing more than an exaggerated collection of fairytale scenarios, assumptions, modelling and predictions, not fact.

Rural Australia is not to be confused with Europe! and this community requires the respect of being supplied with cold hard factual information.

Terms such as “world’s best practice” does not necessarily represent what is appropriate for NSW. There is no one identical environment or country, and the statistics are adaptive to suit the proponent.

Surely the NSW government does not put its faith in an EIS that was prepared in 2021/2022.

Waste technology has moved a long way since then and research has proved time and again that Veolia’s proposal is not appropriate in 2025 and beyond.

Despite what Veolia still portrays, and subsequent to 2020, this French multinational company still thinks it applies “state of the art” thermal technologies.

NSW LGC submission to EPA.

In the report under “Recommendations”:

## Changes to Definitions

6. LGNSW agrees that the expanded exclusions to the definition of ‘thermal treatment’ will ensure that the policy remains flexible and encourages innovation including different approaches to achieve better environmental outcomes.

The LGNSW Submission dated May 2025 (NSW EPA Energy from Waste Framework and Options Paper concludes that:

LGNSW in general considers burning waste material to generate energy as an outdated technology and encourages diversion rather than incineration.

3 years have passed since Veolia presented their plan for Tarago and during that time, accurate scientific analysis, research and numerous studies have identified the problems with waste incineration.

This progressive approach has led to various government bodies such as all regional Local Government Regional Councils to reject the process of incineration.

It is noted and particularly relevant when sourcing the appropriate suitability of outdated thermal technologies in respect of location.

In the terms of reference to thermal technologies not being proposed or employed anywhere on the eastern seaboard:

In 2018, the NSW Independent Planning Commission (IPC) rejected the proposal for an incinerator project for Eastern Creek, Western Sydney, an eastern seaboard location.

In its decision, the IPC cited that the project was not in the public interest for the following reasons:

- The project’s impact on air quality
- The project’s impact on human health
- The suitability of the site
- The relationship between air quality impacts and water quality impacts
- The project is not consistent with objectives of the E.P. & A. Act.

## Comment:

Every single rejection point endorsed by the IPC is directly relevant and applicable to the proposed Veolia Woodlawn ARC Project at Tarago, which makes the Tarago Woodlawn site also inappropriate.

In addition, unlike Western Sydney, Tarago’s water supply is wholly sourced from rainwater tank supply and dams which would be exposed to the toxic residue pollution expelled from the incineration process.

The incinerator will operate 24 hours a day and 7 days a week continuously which makes the pollution accumulative for the operational period of around 25 years.

The projected impacts to humans, air quality, water and soil, must surely be interpreted as more environmentally risky than the already rejected Western Sydney project.

Further, the Tarago incinerator proposal is to be located in a food production area which poses an increased risk to farming practices and food security.

The NSW Government has not identified nor legislated for waste disposal facilities on the “eastern seaboard.” It has abandoned the idea of disposing of waste at the source.

Instead, it has nominated rural regional locations hundreds of kilometres away from the source of waste generation.

Approaching more than one million tonnes of waste per annum is being generated by the eastern seaboard city of Sydney.

The NSW Government thinks it's a good idea to export millions of tonnes of Sydney waste to inland regional locations.

The cost effectiveness of this option is questionable.

The cost of road and rail upgrades, facilities and pollution generated from truck and rail diesel is unacceptable pollution addition.

The community of Tarago and Goulburn Mulwaree Council are asking why we are expected to be a dumping ground for the largest city on the eastern seaboard.

The garbage is generated in Sydney, the garbage belongs to Sydney, the garbage should be disposed of in Sydney.

(b) the spread of the emissions predicted and the quality of emissions to be generated.

The spread of emissions predicted is just a prediction, it does not relate to what actually happens.

The inconsistencies become more relevant when weather conditions are observed in real situations.

Tarago is subject to all weather conditions and events such as Bush fire, drought, snow and flood, and thus emission behaviour is subject to numerous weather complexities.

These complexities are not taken into account with predictions.

The Bureau of Meteorology uses the term "prediction" but that does not mean that weather conditions are accurate or uniform.

"Predictions" are unreliable sources of information especially when dealing with scientific outcomes for human health impacts.

The risk parameters are too great.

The quality of emissions to be generated can also be predicted but differs from what actually happens due to factors such as feedstock materials and furnace temperature inconsistencies.

Feedstock material can be varied which will produce inconsistent emission.

This can only be determined with constant and independent (not periodical) monitoring- something for the EPA to consider.

Emission from incineration processes is not always uniform.

The quality of emission directly affects the surrounding environment.

(c) Health impacts from currently operating older technology waste incinerators as compared to the proposed newer technology

Recently published paper from Science Direct and titled

"Waste Management Bulletin 3 dated 2025 ref 100202."

Journal homepage: [www.elsevier.com/locate/wmb](http://www.elsevier.com/locate/wmb)

Environmental impact of PFAS incineration.

By Jason Kovacs, Richard Higgins, Nathalie Ionesco, Young Cho

Waste Incineration at Low Temperatures.

The study suggests that complete combustion of PFAS material is only achieved at temperatures of 1200 degrees and above.

Veolia's proposed incinerator will operate at around 850 degrees, and thus can be described as an incomplete combustion thermal technology process.

The study highlights the fact that Incomplete combustion provides a direct indication of a secondary pathway for PFAS emissions to the environment.

The study also identifies that incomplete combustion (low temp incineration) of PFAS chemicals has global warming potential (GWP) and climate change impact (CCI) and compares these potential impacts with fluorocarbon combustion (coal fired emissions)

Older thermal technology incinerators previously built around the world are incomplete combustion incinerators and are unable to deal with PFAS material safely.

Veolia has not compared its modelling or indeed quantified the fact that it is proposing an incinerator with incomplete combustion status.

They also have not quantified incomplete combustion impacts in relation to minimising net global warming potential.

The study also looks at the "severe" health and environmental consequences of incomplete combustion of PFAS chemicals.

Veolia's EIS was researched and prepared previous to lodgement in 2022.

The examples, modelling, scenarios adopted for this document do not identify the dangers to human health and environment of incomplete combustion incineration.

The EIS is irrelevant as a state-of-the art document in 2025.

(d) Impacts on human health including on regional town drinking water, rainwater harvesting and soil contamination

The community and stakeholder businesses of Tarago/Lake Bathurst are concerned that the existing environmental structures and logistics present an increased risk due to the exposure of accumulative toxic contaminants from the incineration process proposed by Veolia.

The outdated scenarios, modelling and assumptions provided in the Veolia EIS has driven this community to seek appropriate and applicable scientific studies and research in respect of the impacts from exposure to incineration pollutants on human health and the local environment.

It must be recognised that the local rural environment consists of water supply wholly sourced by rainwater harvest.

There is no "town water" supplied.

Rainwater is collected from roof tops and stored in tanks.

Livestock and animals source water from open dams in paddocks on properties.

These two methods of water collection and storage cannot be protected from the impacts of accumulative exposure to toxic chemicals.

What is more concerning is the fact that the area surrounding Woodlawn precinct is part of the Sydney Water Catchment.

This catchment is also destined to be exposed to concentrated leachate events and groundwater issues.

We know and understand this because historically, so many landfill waste facilities suffer ongoing endemic leachate issues.

I'm sure Sydney residents would love to know that their garbage will eventually pollute the water they drink!

This is an ongoing risk to human health.

The same applies to the soil, exposure to toxic chemicals is permanent, (irreversible particularly with exposure to the PFAS, PFOA group of forever plastics) and the contamination is 24 hours a day, 7 days a week for around 25 years.

The impact of chemical exposure to water and soil is increased when it rains as the toxins are delivered with the help of water from air pollution.

Examples of research are included below:

The health impacts of waste incineration: a systematic review

Peter W. Tait, James Brew, Angelina Che, Adam Costanzo, Andrew Danyluk, Meg Davis, Ahmed Khalaf, Kathryn McMahon, Alastair Watson, Kirsten Rowcliff, Devin Bowles

First published: 18 September 2019

<https://doi.org/10.1111/1753-6405.12939>

The results of this review identify the potential danger of human and animal exposure to Incineration pollutants.

It also identifies the risk of food contamination in the food chain where Incinerators are placed in close proximity to food production regions.

The Conclusion of this report reads:

“This review shows contamination of food and ingestion of pollutants is a significant risk pathway for both nearby and distant residents. While occupationally exposed groups have been shown in primary studies to most likely suffer adverse effects, they are a relatively smaller population than all residents in the vicinity of incinerators. Workers may be considered a sentinel population for adverse effects. Incinerator workers are probably also local residents so also subject to exposures outside the workplace. Both local residents ingesting food grown in close proximity to incinerators, as well as more distant populations consuming food transported from areas near an incinerator, are open to exposure. Because most studies in this review examined only a small subset of potential exposure and disease pathways, together with the low quality, it is likely that our review has ‘under-discovered’ the full health-effects picture.”

Academics from the Australian National University Medical School, the Public Health Association of Australia, and Council of Academic Public Health Institutions Australia completed a systematic review of the health impacts of waste incineration which was published in the Australian and New Zealand Journal of Public Health in 2020 (Ref 6) and referenced by the NSW Government Chief Scientist and Engineer in his report to the NSW Minister for Environment that same year. That report concluded:

Communities Against the Tarago Incinerator (CATTI)

Formal Objection to the proposed Veolia Woodlawn Advanced Energy Recovery Centre (ARC)

“There is insufficient evidence to conclude that, any incinerator is safe” and in particular, “contamination of food and ingestion of pollutants is a significant, risk pathway for both nearby and distant residents”.

The NSW Government Acknowledges the Science

The NSW Government recognises the threat WTE incineration poses to human health in the Energy from Waste Infrastructure Plan 2021.

(e) The impact on agriculture locally and across the wider region

As land holder custodians, we have the right to protect our land from any potential industrial environment threat.

NSW Government documents, websites and communications are all written with an “Acknowledgement to Indigenous peoples past and present.”

The acknowledgement makes reference to Indigenous peoples having the right to protect the Land, Waters, Skies and Natural resources of NSW.

It is not only the privilege of Indigenous peoples to protect the environment, it also applies to the present landcarers.

The NSW Government does not have the right to approve a project that affects the ability of owners, past and present to protect their Land, Waters, Skies and Natural Resources from the threat of industrial pollution on any level.

It would be a foolish notion to think that continual and ongoing government acknowledgement of the rights of Indigenous peoples (land, skies, water) would not be consistent with current landholders.

The rights of indigenous Australians are not exclusive in relation to protection of Land, skies, Water and natural resources. If it is implied that they (the rights) are, then maybe that notion should be tested.

We all have the same rights in Australia (implied in the Australian Constitution.)

Landcarers and farmers do not accept the present “guidelines” or “limitations” endorsed and applied by Government policies for industrial incineration facilities as these standards fall well short of responsible levels required for safe food production for humans.

It is not in our interest to produce food that has levels of toxins that in excess of other primary production areas in NSW.

I note that the Local Land Services (under the DPI) has set standards of nil tolerance for the presence of chemicals such as Lead, Cadmium, Arsenic for NVD compliance.

Farmers consider this standard is entirely acceptable and necessary.

These standards reflect the important need for a safe food chain environment.

The standards, limitations and guidelines set out for industrial incinerator projects such as the Tarago Woodlawn ARC do not meet the same standards for food production.

Comment:

The NSW Government needs to align industrial pollution limitations and guidelines to meet human health requirements and animal and secure food production standards when attempting to locate industries in a rural area or near humans.

If this scenario is not achievable then the incinerator facility should be located where there is no impact on food and water supply.

Below is communication with the DPI, 2025.

I refer to the Department of industry’s recent correspondence to landholders and note the information relating to “Biosecurity”,

It states that “The NSW Biosecurity Act 2015 was introduced to prevent, eliminate and minimise biosecurity risks, including adverse effects on the economy, environment or community.”

Part “c” of the notation statement includes biosecurity duty and biosecurity risks

“on animals, plants or animal products becoming chemically affected.”

Understanding the above statement would suggest that our sheep, wool, cattle, pigs, chickens, crops, working dogs and associated vegetation environment would be indeed chemically affected by “negligible” amounts of toxic particulate materials introduced into the environment with the process of incineration.

Frankly, it would be naïve to believe that 24 hours/7 days a week exposure to accumulative toxic particles over a 25year period would be negligible.

Any exposure to toxic chemical is a health risk and the Veolia EIS of 2022 does not give a scenario for best practice accumulative figures if you breathe it, drink water contaminated with it, wash with it and eat food and animals grown on and, in the soil exposed to it over a 25year period.

Veolia's EIS of 2022 recommends there is "negligible impact on human health, environment, air quality, suitability of site, water and soil."

We know that is a lie.

A recent article in the Land newspaper written by Elka Devney highlights rural farmers concerns in Tarago and Parkes:

"We cannot risk compromising these foundations for short term industrial experiments that put our long term future at stake."

"A major incinerator nearby (farming land) would threaten the trust that underpins market access, potentially affecting not only our family's livelihood but the sustainability of farming across the region."

"To jeopardise that for the sake of burning Sydney's rubbish is not only reckless, it is a betrayal of the values that regional communities stand for."

"Fears of contamination, stigma, or actual pollution could tarnish the reputation of our produce and collapse farm businesses overnight.

The loss of livelihood, property value, and generational legacy would be an unbearable blow.

To walk away is not just to sell land; it is to sell their homes, their businesses, their machinery, their livestock, and, in many cases, their family's history.

No one deserves the mental toll that weighs on the broader community at present.

Families, farmers and entire communities (are) carrying the weight of fear for their futures, their children and their livelihoods.

That fear does not fade when the meeting ends or the news cycle moves on, it lingers in households, it fuels anxiety, and it drives people to breaking point.

The mental health consequences of this proposal (Tarago and Parkes) are real, immediate and devastating."

The article further explored the feelings of communities such as Tarago and Parkes:

"Planning such projects in Tarago and Parkes does not eliminate the risk, it just redirects the risk to a population perceived to be of lesser value, visibility, an political power.

Our community, as well as any community, deserves better than being treated as a dumping ground.

The implicit message is that our health and wellbeing matter less than those in metropolitan areas.

It's a question that weighs heavily on or minds every single day."

Putting these comments into a further perspective, "a 15-yesr-old boy from Tarago said it felt like they were being asked to sacrifice their (own) health for someone else's waste."

Surely NSW can do better than this.

Farmers work in all conditions, flood, fire and drought to bring the people of NSW clean and safe food products.

There is no doubt now that this Government is doing its best to eliminate the primary industry enterprises in selective regions of NSW.

This stance is evidenced by the complete lack of support for farming enterprises being impacted by foreign garbage disposal companies and inappropriate government planning laws.

Enough is enough, If this poor state of affairs is allowed to continue, then the result will be permanently contaminated rural land, skies, water, broke and busted farmers, and NO FOOD.

I am not enthused at the prospect of having to buy my food imported from China.

It will expensive and contaminated.

Contribution of farming business enterprises in the Tarago/Lake Bathurst region (surrounding the Veolia proposed Woodlawn ARC project).

The members of the Long Water Agricultural Association (incorporated)LWAA, are the owners of approximately 63,966 hectares of land directly surrounding the Veolia Woodlawn precinct.

The farming enterprises support:

143 EMPLOYEES.

THESE PROPERTIES PRODUCE:

220,547 EXPORT QUALITY SHEEP.

5,000 BALES OF EXPORT QUALITY WOOL.

7,247 HECTARES OF CROP.

20,000 CHICKENS.

21,206 CATTLE.

COMMENT.

Our region and district are well serviced by markets situated in close proximity to enterprises such as:

Southern Meats who process and export our sheep produce to international markets.

SELX Cattle and Sheep sale yards at Yass.

Various wool store facilities for premium Merino wool markets.

Nearby Goulburn is the home of the Big Merino.

Thousands of tonnes of stored grain product in silos and silage and hay that will be exposed to accumulative chemicals when uncovered.

But, apparently this agricultural region, with its contribution to the second and third biggest export industries of this Nation, is not in the interest of the New South Wales Department of Primary Industry and much less The New South Wales Government.

Your government would much prefer a toxin producing waste dump for Sydney's rubbish and by your inaction, are determined to oversee the potential demise of an important food producing region of New South Wales.

PROOF OF THE IMPENDING DANGER TO AGRICULTURE, HEALTH AND ENVIRONMENT.

The Long Water Agricultural Association is now in receipt of the recent EPA Report which details the Surface Water Sampling results (undertaken in October 2024) for Allianoyonyiga Creek and Crisps Creek.

These locations are outside the Veolia Woodlawn precinct.

The EPA and Veolia are proposing further testing to determine the extent of contamination.

The results clearly show exceedances for The Draft Livestock Drinking Water Guidelines (LDWG's) (ANZG, 2023) #

Results can be accessed in the below report:

<https://www.epa.nsw.gov.au/Working-together/Community-engagement/updates-on-issues/Woodlawn-Eco-Precinct-Tarago/surface-water-sampling-Allianoyonyiga-Creek-Crisps-Creek>

This report does not table what the potential risk to livestock and environment might or could be.

It tables the reality of what is actually happening, and the landholder farmers of this region are now directly in the path of what lies ahead, irreparable, permanent environmental damage to their properties and animals.

Quite simply, the results of this EPA Report indicate that a point of no return has been reached.

There is no longer a potential risk, it is now an existing environmental hazard.

Our community is dealing with a dangerous and unacceptable environmental impact.

There is no advantage to be gained from waiting till our land, health and environment is polluted and our livelihoods ruined.

Veolia cannot and must not be trusted with the management of our regional environment.

The Incineration plant has not even been approved and we are already experiencing dangerous breaches.

Veolia's atrocious record to date, over a 20year period, is the very reason why it is entirely inappropriate to approve SSD-21184278.

Below is an example of the potential impacts from the Veolia proposed incinerator.

It is entirely reasonable for one to accept that sheep wool would be exposed to toxic particulate matter with constant exposure to air, water and soil from the Veolia incineration process facility as described in the EIS (2022).

Handling of sheep and wool would place workers at risk of close, repeated and concentrated exposure to toxic matter.

Exploring the Example:

A shearer can average at least 150 sheep a day.

Some of our farming enterprises in Tarago/Lake Bathurst have shearing runs of 10,000 sheep.

Exposure to this much concentrated toxic chemical (handling wool and sheep) in a shearing shed environment cannot possibly amount to "negligible."

Further to that scenario, I'm not sure whether any sane shearer would take on the job, when there are plenty of other non-toxic shearing jobs available.

Guess where that leaves us?

It leaves us with a tainted toxic wool product that no one wants to shear or buy.

Farm workers would also be exposed to these risks when working with hundreds of sheep involved with drenching, foot bathing, pregnancy testing etc.

Apart from the damage to farm products, there is an obvious unacceptable potential risk to human health.

We see these potential risks ahead, along with many other animal and grain handling situations which Veolia do not address.

The above example translates to loss of markets and then loss of income (consequential loss) and because it's persistent, eventually loss of human life over the period of the project.

Expanding the notion that the livestock, wool and grain marketplaces understand and know the produce from Tarago/Lake Bathurst region has been exposed to toxic material, the comparison to a clean environment product diminishes the value of the "negligible" toxic material product. (income and consequential loss on every level).

Veolia's EIS does not identify these scenarios.

Understandably, one can't expect a flawed EIS prepared for a French waste disposal company to appreciate the potential risks to the farming environment and Australian agricultural industry!

That is the precise reason why accepting the information contained in the proponent's EIS is highly questionable in relation to agricultural activity.

The LWAA has not blindly accepted the "scenarios", "assumptions" and "modelling" presented in support of the Veolia proposal, instead it has identified a very real threat to the ongoing existence of agricultural activity.

We don't understand why we have to wait until our environment, animals and humans suffer the consequences of toxic chemical exposure introduced by a garbage waste company.

Current research identifies these impacts do not become apparent immediately.

The impacts are developed over a number of years of constant exposure.

As constituents and legitimate business stakeholders, we expect the NSW Government to protect the human health and environment (HHE) of the people who live and work in Tarago/Lake Bathurst.

This is a basic human right was recognised, amongst other issues, by the IPC in its decision to reject the Western Sydney incineration project in 2018.

The community of Tarago/Lake Bathurst expects the same level of HHE protection to be applied to all people of NSW.

(f) Alterations to the Parkes Special Activation Precinct specifically in relation to the proposed Energy Recovery Facility in that region

There is no comment here as this submission deals with matters relating to Tarago precinct.

(g) Impacts of waste dumping over a number of decades in the Tarago region

An example of the impacts of waste dumping in the Tarago region can be seen with numerous licence variations granted to Veolia and encouraged by NSW Government.

NSW experienced a season of catastrophic bush fires during the summer of 2020/2021.

The fires burnt homes and structures containing many tonnes of asbestos material.

Veolia does not have a licence to accept asbestos material at Tarago.

At the suggestion of the government, Veolia applied for a licence variation to accept tonnes of asbestos contaminated material from South Coast homes that had been destroyed by fire.

The asbestos material was buried as landfill at the Woodlawn precinct.

It is concerning that restrictions can be put in place for dangerous and hazardous materials and then reversed by a "variation" to licence.

This is an example of waste dumping in our community.

There are numerous variations to licence that accommodate hazardous waste residues which makes the Veolia precinct more dangerous than what is perceived or known.

This is a deceitful and deceptive practice, one which leads to distrust of Veolia and the government.

(h) The methodology of emission monitoring employed by leading large scale waste-to energy facilities in Australia and across the world

The NSW Government relies on the EPA to police the environmental pollution issues arising from breaches to guidelines and limitations of industrial activities in NSW.

The current system adopts a self-reporting regime where industries provide periodical operational reports to the EPA as set out in the guidelines.

The system (EPA) adopted by the NSW Government is flawed, and time and again the EPA acts well after the environmental damage has occurred.

Periodical self- reporting methods and analyses do not follow actual hazardous and toxic breaches, as these can happen any time.

An example of this flawed system is evidenced by the incidence of Asbestos materials found in landscaping mulch at Rozelle Parklands in January 2024.

Subsequent testing revealed that contaminated mulch had been used at many other public and private locations across Sydney, including several schools and hospitals.

As a result, the EPA launched a major investigation and has begun prosecuting companies and individuals involved in the supply chain.

The point raised here is that the EPA system of self- reporting failed to arrest the problem before the damage was done.

The EPA needs to adopt a more stringent approach to companies and individuals who are routing this system.

It is not sufficient or economically viable to spend millions of dollars cleaning up an environmental disaster after it has happened.

Currently the EPA is an ineffective agency with no real power to police industry in NSW.

This government agency issues fines for illegal breaches and then issues more fines when it happens again!

There is no actual deterrent to industry.

The Veolia Woodlawn precinct has been issued and fined hundreds of times and continues to breach guidelines regularly which seriously pollute the environment at Tarago.

This approach by the EPA is completely futile.

Veolia are happy to pay the fines and do the remedial work and pass the cost on to the customer, in this case the Government.

How stupid is that?

It does not achieve an acceptable level of protection to the environment.

#### VEOLIA'S LATEST SOLUTION TO WASTE MANAGEMENT GUIDELINES.

Veolia has realised that future guidelines and exceedance rules are being considered by the EPA.

Veolia's response to this is to suggest that the guidelines need to be relaxed so that ongoing operational constraints are not impacted.

The interpretation of relaxing the guidelines means the application of a lower tolerance level of exceedance compliance.

This provides a direct pathway to the introduction of increased hazardous chemicals being released into the environment when breaches occur.

It shows that Veolia do not have any level of respect for our environment.

(i) Alternative solutions to reduce and manage residual waste produced by Greater Sydney

I would agree with all of the following

Recommendations as a workable solution:

1. The Australian government place a moratorium on all waste to energy incineration projects.
2. The Australian government amends the Renewable Energy Act to remove all renewable and clean energy subsidies for all waste to energy incineration and co-incineration technologies.
3. -
4. The Australian government invests in existing and proven Zero Waste policy initiatives that include:
  - a. Better, more advanced waste collection and source separation methods and technologies for all waste streams.
  - b. More effective Material Recovery Facilities that reduce the generation of residual waste and increase the volumes of recyclable and reusable waste resources.
  - c. Increased separate collection and composting of all organic wastes.
  - d. Establishing targets of 90% removal of organic materials from landfill and diversion to composting.
  - e. Investment in Anaerobic Digestion as a preferred energy from waste technology.
  - f. Investment in dedicated residual waste research and treatment.
  - g. Investment in Landfill Gas capture technology for all existing and future landfills.

These recommendations provide constructive, environmentally sustainable alternative solutions to incineration.

Source: Toxics Free Australia.

Modern sustainable waste management strategies include programmes that:

- Reduce
- Repair
- Reuse
- Recycle.

Source; NSW Government website.

So, who's job would it be to come up with an alternative solution to manage residual waste produced by Greater Sydney?

Firstly, I would suggest that the problem is created in Greater Sydney (approx. 6 million brainiacs)

It would be logical and highly appropriate that Sydney solves their own problem instead of dumping their rubbish in Tarago which then exposes me to toxic pollution.

Who else would have the responsibility of solving the problem?

Oh yes, that group of people in Macquarie Street. We pay them billions of dollars to act for the public that votes them into Government.

So, I would say, the task of this question (i) sits fairly and squarely on the shoulders of the NSW State Government.

Comment:

It is not in the public interest to dump and incinerate rubbish in rural areas at the expense of valuable environment which is crucial asset for the future sustainable land use of this state.

The path forward lies in adopting the most efficient up to date technologies available.

It must be realised and accepted that Veolia has no real interest in the preservation of NSW land. It is expendable to Veolia and irreplaceable to everyone else.

Their motive is to make money from a country (Australia) that provides them with easy and cheap (850degree outdated incineration techniques) and antiquated environmental constraints and guidelines.

There are many more countries out there with their own environmental standards that do not tolerate cowboy operations.

NSW are sitting ducks for multinational companies with no moral investment such as Veolia.

This French company loves Australia because they know there is little chance of prosecution for their activities here due to a severe lack of workable environmental protection laws, unlike overseas where they (Veolia) constantly face criminal environmental breaches.

(j) Any other related matters.

1. It is pointed out to this inquiry that 3years has passed since EMM lodged their EIS on behalf of Veolia.

Hundreds of submissions were also lodged in response to Veolia's proposal.

One of the conditions set out in the SEARS is the duty of Veolia to reply to the submissions lodged.

It is now October 2025 and there has been no acknowledgement or reply (as required) to the many submissions lodged by the public.

The public sees this attitude and lack of response as yet another indication of contempt.

Firstly, Veolia ignored the community objections and then hasn't given any meaningful response to these well founded objections, and to add insult, the NSW Government has not applied the conditions of the SEARS in respect of this point.

## 2. GOVERNMENT RESPONSIBILITY TO INTERNATIONAL CONVENTIONS.

There are several progressive International Conventions available to both Federal and State Governments in Australia.

Examples of these are below:

### STOCKHOLM CONVENTION.

This convention relates to Waste Incineration as a major source of UPOP's. (ANNEXE C)

The objective of the Stockholm Convention on Persistent Organic Pollutants (POP's) is:

“to protect human health and environment from persistent organic pollutants,” (Stockholm Convention 2010.)

Australia is a signatory to the Stockholm Convention.

Other examples of progressive and relatable Conventions that government has at their fingertips include:

#### MINAMATA CONVENTION.

Waste incineration is in the top 5 industrial sources of Mercury emissions (ANNEXE D)

This particular Convention has been created, once again, to protect human health and the environment from anthropogenic emissions and release of Mercury and Mercury compounds.

Mercury is a toxic substance not tolerated in food production in NSW.

#### BASEL CONVENTION.

The Basel Convention aims to protect human health and the environment against the adverse effects resulting from the generation, management, transboundary movements and disposal of hazardous and other wastes.

The Convention identifies residues arising from the incineration of household waste as hazardous waste.

### 3. A DAY IN THE LIFE.

A look at what the future holds for workers and residents every day of every month of every year in Tarago NSW.

The assumption here is that NSW Government has approved the Woodlawn precinct incinerator facility and Veolia is now operating 24 hours a day.

“it” refers to the toxic particulate matter produced with the incineration process at Woodlawn.

There are other pollution sources but let’s just deal with Air.

Another day in Tarago, I wake up after breathing it while I sleep.

It is on the sheets and pillow I just slept on.

I am now showering and brushing my teeth in water that contains it.

I have breakfast in the kitchen where it has settled on the fruit bowl and the bench top.

The cups, plates and utensils that I use have all been exposed to it.

Next, I put some washing on. The water I wash with also contains it.

I go outside to hang the washing, but oh, not again, I can smell the stench of rotting garbage in the breeze coming from the Veolia precinct, a common occurrence.

It sticks in your nose and makes you nauseous.

I am not sure what impact that pollution has on me.

I know the washing on the line will now also smell of rotting garbage and it will be there too.

Then there’s the cleaning. I do the day to day chores.

Housework stirs up dust which contains it.

Then it’s time to pick up mail in Tarago.

I drive into town where there is a steady stream of b double trucks from Woodlawn constantly using the main intersection.

There are truck potholes at this intersection on a permanent basis, no one attends to this.

Collect the mail which has been sitting exposed to it.

Get a coffee at the local shop made with water containing it.

Next, it's back to the farm for a day of yard work with sheep.

Lots of dust stirred up by 1000 head of ewes. I am breathing in the dust that contains it.

Drenching and handling woolly merino sheep in the yards.

The wool on the sheep's backs contain plenty of it.

It is on my hands, on my clothes, up my nose and I'm still breathing it.

But then, the weather changes and it starts to rain, which delivers a more concentrated dose of it due to the moisture now in the air.

Job finished and sheep returned to the paddock.

Out in the open now checking stock and water.

In contact with the soil, pasture, dam water, cattle, sheep, crops which have all been exposed to it permanently thanks to the incinerator at Woodlawn.

After a few years of constant exposure to it in the air, water and soil, I start to feel unwell.

Next, I see a doctor who diagnoses me with cancer.

Then I stop work and living a normal life and eventually die from the accumulative ingestion of toxic particulate matter manufactured by an incinerator operated by Veolia.

Everyone, including the NSW Government deemed the incinerator as harmless.

Then the Erin Brockovich trouble starts.

I am not the only person to die from the effects of toxic ingestion, there are plenty of humans and animals constantly at risk in Tarago.

This is what life will be like for local residents and workers when an out of date, inappropriate incinerator and landfill facility is operational.

Do you really want this reality to happen?

We are faced with this threat every day, and we live with the fear of it.

#### 4. THE ROLE OF FEDERAL CRITICAL INFRASTRUCTURE AND APPLICATION TO NSW SSD.

It is observed and understood that Federal Critical infrastructure law takes precedence over any State law, therefore, NSW Government is subject to the application of Federal laws.

It is also observed that to date, the EIS presented by Veolia in 2022 does not include the details of the energy component required under the SEARS.

The community and general public have not been made aware of any energy details as yet.

It is now 2025 and still no energy solution.

The only information we have is the plan to connect the energy component of the project to supply 40,000 homes with power.

It does not explain how or where these houses to be powered are located.

With the absence of the energy component, it renders the Veolia Woodlawn project just a facility with an incinerator.

The Woodlawn project therefore cannot be termed or in any way related to energy output, and when the principles of Federal Critical Infrastructure are applied, then the food supply element becomes paramount, because there is no energy consideration.

Federal Critical Infrastructure is described as providing “services that are essential for everyday life such as energy, food, water, transport, communications, health and banking and finance.”

#### COMMENT:

With reference to the above statement, it would seem obvious that both “energy” and “food” are integral elements of Federal Critical Infrastructure.

The EPA states that “Energy from waste is an opportunity for residual waste, that can’t be recycled, to be converted into energy through thermal process.”

The above statement is entirely plausible and progressive in principle, but the principle is defeated when the Federal Critical Infrastructure policy is applied with respect to the “food” and “health” elements as these are extinguished in favour of the “energy” option.

In other words, the pursuit of energy development in already established rural food production regions where human health is also a risk factor is entirely inconsistent with the principles of Critical Infrastructure.

It does not allow under any circumstances the substitution of energy in preference to food security or health.

The positive point on offer here is that there is no doubt that all the elements contained in the Critical Infrastructure statement are of equal importance.

That being an established position, it would seem that both the current and proposed Veolia energy facilities at Woodlawn are indeed in conflict with the existing established food production industry.

#### CONCLUSION:

Federal Critical Infrastructure does not include Garbage waste disposal as a critical element but does include food supply.

NSW Government is attempting to extinguish one element (food security) of Critical Infrastructure and replace it with another (waste disposal).

A desirable outcome would be for both elements to exist concurrently, and as the food security element already is established and operational in the Tarago region, then it makes sense that the waste disposal element should be located elsewhere.

It exposes just how inappropriate the site choice of Woodlawn precinct is for a waste facility.

#### 5. RISK.

What does the Veolia Woodlawn ARC development risk?

- a. The most important risk here is human health.
- b. Permanent degradation of the surrounding environment.
- c. The destruction of many rural primary enterprises that have existed for more than 200 years.
- d. It puts at risk the safe water supply to over 6million people in the Greater Sydney Region.
- e. It puts the jobs of regional workers at risk.

f. It risks the right of Indigenous peoples and others to protect Lands, Air, Waters and Skies of the Tarago region.

#### 6. ANU SEISMIC STUDY LAKE GEORGE LOCALITY.

Canberra City News published an article dated October 2025 which highlights a study undertaken from December 2020 to January 2021 by the Australian National University.

The ANU researchers say the study provides “unprecedented” insights into the structural characteristics of the Lake George fault zone, which runs along the western boundary of the lake.

(Local residents have seen physical evidence of this fault zone in Lake George during dry times.)

“The Lake George fault zone, which stretches about 80kilometres, is one of three major fault systems near Canberra and is considered active today.”

The Veolia Woodlawn precinct is located less than 5 kilometres from Lake George.

A comprehensive seismic study of the Woodlawn location and surrounds was not carried out with the preparation of Veolia’s EIS in 2022.

This study would indicate that the currently active Lake George Fault zone may impact the proposed incinerator and precinct.

A consideration not addressed by Veolia but would have to be a basic geophysical/ geographical contingency relating to the safe and appropriate location of a waste incineration facility.

A cause for concern.

The article can be found below:

<https://citynews.com.au/2025/traffic-vibrations-share-the-story-of-lake-georges-seismic-past/>