

## Woodlawn Eco-Precinct Update - November & December 2023

Those of you who use Veolia's web page may be familiar with some parts of this article from our Eco Precinct monthly newsletter. The main difference with this article is the updates to the ARC section and the Woodlawn Eco Precinct tonnage section has been removed as it is reported Quarterly in the Community Liaison Committee presentation that can be found on the Veolia Web site. The ARC team have used their space to respond to last month's CATTI article to ensure the community gets both sides of the story.

### A message from Justin Houghton

We recently conducted a review of our staffing and recruitment efforts over the past 12 months, and we are pleased to report that we continue to increase our number of local employees. We have welcomed 14 new staff in the past year, consisting of nine permanent staff and five labour hires — all from the local area. Seven of these new employees are from Tarago, one from Windellama, two from Currawang and four from Goulburn. In line with our diversity and gender equality policies, we are proud to say that three of these new recruits are female. In an industry which is traditionally male dominated, this achievement represents a step in the right direction as we continue our ongoing dedication to fostering an inclusive and diverse environment at the Woodlawn site.



***Veolia Woodlawn Mechanical Biological Treatment Facility (MBT) team.***

## Woodlawn Liquid Management Update

We all suffered during the three years of extremely high rainfall from early 2020 to late 2022. As a result, all of our dams on site filled to their freeboard. Freeboard is airspace below the overflow level of a dam and is managed as the maximum operating level of the dam. This leaves us enough capacity to safely manage any emergency volumes to prevent an off site discharge. Freeboard volumes or levels are worked out by an independent third party based on water balance calculations. Woodlawn's water balance is submitted and approved by regulators. We were, and continue to be, working under an approved water balance.

Freeboard volumes were breached during those three years of almost double our annual average rainfall. These breaches were all reported to the relevant authorities and as such became formal non-compliances. Even though it is registered as a non-compliance, there was no offsite discharge during this period. This showed that in this emergency situation, while we moved liquid around the site between different dams the volume above freeboard remained sufficient to prevent offsite discharges, as was intended. The good news today is that due to the significant increase in our mechanical evaporation capacity and better weather conditions we have been able to reduce the water in four of our six dams to below the freeboard level (including our largest dam ED1). The remaining two are today within centimetres of freeboard.

We will now update the water balance with the independent third party hydrogeologists Engeny, who are approved by the EPA to account for these extreme weather conditions. The water balance will also assess and recommend other ways of treating, storing and using excess liquid on site. We will then need to submit this new water balance for approval and update our management plans to reflect the new liquid management requirements.

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.

## Woodlawn ARC Update

It is important we address an article<sup>1</sup> published in last month's Tarago Times. The article related to our proposal for an energy from waste plant at Woodlawn Eco Precinct and made a number of inaccurate statements in response to our October Veolia Update<sup>2</sup>. We understand some members of the community have concerns about a new technological development but it is equally important to have a balanced discussion so people can make informed decisions.

Unfortunately, that article selectively presented data without providing the necessary context. Certain statements within the article were simply incorrect, which is disheartening, because we are always available to answer questions and provide clarifications to rectify any community misunderstandings.

We value open and transparent communication with the community, which is why we regularly address questions and concerns raised by local groups. In fact, the author is a member of a group that has consistently submitted questions to us, which we have consistently answered.

Accurate information is crucial when discussing important matters, such as the proposed energy from waste plant. For this reason, we must address some incorrect claims made for the sake of clarity and transparency. To keep it simple, we've listed the key statements and identified where they are true, where they are false and added important context where it was lacking.

- **TRUE: Veolia was issued with a prevention notice by the NSW EPA<sup>3</sup> because an odour report was not submitted by the appointed auditor.** Every year we engage an independent auditor<sup>4</sup> to conduct gas tests and prepare and submit a report to the NSW EPA, which is due before the end of the year. The gas tests were undertaken back in Q2-3 2023, yet the auditor's report is currently five months late despite our repeated requests. This has led to the prevention notice as we, along with the NSW EPA, have not received a copy of the report. We will review auditors in 2024 to ensure timely submission. We agree this is not acceptable, however, it has not materially affected anyone, and we have continued to do everything in our power to mitigate odour.
- **FALSE: Veolia has done nothing to address odours (reference to NSW EPA Public Registers and Woodlawn).** It is important to note when reviewing the Public Registers page<sup>5</sup> using the search term "all", as suggested in the article, it produces a list that shows every activity at Woodlawn, not just penalty notices. That search includes licences, variations, compliance audits and penalties.<sup>6</sup> An accurate search identifying only penalty notices identifies 10 such notices over a period of 21 years. Our goal is always to prevent penalty notices, which is why we have taken various measures<sup>7</sup> to address odours, including:
  - installing H2S sensors,
  - commissioning a village weather station,

- investing over \$3 million in upgrades,
- redesigning our gas collection infrastructure,
- adding new gas extraction wells, and
- upgrading our gas extraction equipment.

We are also expanding our gas sampling beyond regulatory requirements and will be seeking community feedback in the coming months on a proposed gas monitoring campaign. Regular articles in the Tarago Times and updates in the CLC minutes<sup>8</sup> outline progress and action in regards to odour management on site.

- **FALSE: The claim that the Staffordshire, UK, energy-from-waste plant exceeds emissions every month.** Emissions in Staffordshire consistently remain well below the authorised limits, as demonstrated by the graphs available publically online<sup>9</sup>.
- **FALSE: The claim that incinerators are one of the largest greenhouse gas emitters in the UK.** According to the most recent finalised figures of *Estimated Greenhouse Gas Emissions by Source in the UK (2021)*<sup>10</sup> — see Table 1.2 — energy from waste only produces 0.3 M tonnes of carbon dioxide equivalent per year. In comparison, cattle burps in the UK alone produce 18.1 M tonnes of carbon dioxide equivalent - around 60 times more emissions.
- **FALSE: The article falsely claims Veolia contaminated a river in Italy and attempted to hide it. This is misleading.** In 2007, Veolia acquired the Versilia plant in Italy. After this acquisition, it was discovered that previous management had falsified emissions documents.<sup>11</sup> Following an internal investigation, Veolia immediately reported the issue to authorities, suspended the managers involved, and launched multiple internal investigations. The contamination was found to be caused by a faulty valve and Veolia engaged the local community through town hall meetings and community sessions while working closely with authorities. Veolia also responded globally to this issue with a company-wide review of energy from waste facilities, increased audits, enhanced training, tighter protocols and increasing community transparency. We acted transparently but also learned from this event, implementing robust measures to uphold our highest environmental and ethical standards.  
It is worth noting that such an event could not happen today because the feedstock is different, the number of controls now in place, the practice of continuous monitoring with regular visibility of data, and the range of new technologies employed today.
- **TRUE: Particulates will be emitted from the facility.** Particulates come from a variety of sources including cars, buses, tilled fields, livestock operations, wind generated dust, unpaved roads, quarrying and household wood burning<sup>12</sup>. This means there is a constant background level no matter where you are. In total, the amount of particulates emitted by the ARC in an entire year would be the same as is produced by 13 vehicles. This is why an independent environmental impact assessment concluded that particulate emissions would be so small compared to what is already produced by other sources as to be negligible.
- **FALSE: More than 6000 kgs of contaminated dust will blow into Tarago.** While there may be some dust created within the precinct boundaries, very little of it can go beyond those boundaries. As part of the ARC operation there will be real time

monitoring of particulates and dust. The environmental impact assessment found the concentrations of dust remain well below the assessment criteria set by the NSW EPA.

- **FALSE: The claim that people in Switzerland cannot eat their fruit due to pollution from local incinerators is misleading.** The mentioned plant, Vallon, was built in 1958 and the dioxin pollution ceased in 1982 when filters were added to meet environmental standards of 40 years ago<sup>13</sup>. Modern energy from waste plants are an entirely different technology — akin to comparing a modern iPhone to a landline — and regulatory processes now ensure their compliance is not comparable to facilities from 40-60 years ago.
- **FURTHER CONTEXT: The claim that an Australian peer-reviewed systematic review of the health impacts of incinerators found significant risks to health and contamination of food growing areas is inaccurate.** The study itself admits to significant research limits stating “the review has revealed substantial gaps and inconsistencies”<sup>14</sup> and applies the precautionary principle (we don’t know, so let’s be safe). Many studies included in the review relate to outdated energy from waste facilities that do not meet current standards. The review does not reject technologies of this kind but emphasises, “that it needs to be pursued carefully, with close monitoring” and that “early transparent consultation with communities about these facilities is essential”. This aligns with our approach, as we are committed to proceeding with transparency and community engagement.
- **TRUE: The Australian Wine Research Institute (AWRI) has expressed concerns about the potential risk of contamination of grapes and tainting of wine due to the energy from waste proposal<sup>15</sup>.**  
We respectfully hold a different perspective on this issue. Real world examples from renowned wine regions in Europe demonstrate this risk is negligible to non-existent. We have operational energy from waste plants in award winning wine regions in Bordeaux, Champagne, Loire and Rhone and have no reports of wine tainting. This experience is echoed in other wine regions across France and other countries.
- **TRUE: In our original article Veolia did not provide references.** All key information relating to the proposed project can be found by looking at our fully referenced Environmental Impact Statement and associated technical reports<sup>16</sup>.

Thank you all for your patience in reading this article and for engaging with us throughout the year. We wish the Tarago community a safe and happy holiday season and look forward to seeing you all in 2024.

## References

1. Greenwashing Woodlawn’s Incinerator to Fluorescent Green Extremes, Communities Against The Tarago Incinerator Inc November 2023
2. Veolia Update, Tarago Times October 2023
3. NSW EPA Prevention Notice 3505858, REG-4137, 04-10-2023
4. Woodlawn Eco Precinct Independent Odour Audit 2022  
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5. NSW EPA Public registers website 2023
  6. <https://www.epa.nsw.gov.au/licensing-and-regulation/public-registers> (Click on button “Search for penalty notice. In the field “Issued to” type Veolia and in the field “Suburb” type Tarago. Click search button.
  7. Woodlawn Eco Precinct Monthly Newsletter April 2023  
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  9. Four Ashes Energy from Waste Facility  
<https://www.staffordshire.veolia.co.uk/facilities/four-ashes-emissions-air-data>
  10. UK Greenhouse Gas emissions National Statistics 1990-2021  
<https://assets.publishing.service.gov.uk/media/642337b32fa8480013ec0de4/final-greenhouse-gas-emissions-tables-2021.xlsx>
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  14. <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-49547220%2120221215T025529.051%20GMT>
  15. <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-49547220%2120221215T002634.585%20GMT>
  16. Woodlawn Advanced Energy Recovery Centre SSD NSW Government Major Projects Portal  
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-21184278%2120221017T223510.065%20GMT>

## Final Word

It has been a very productive and challenging year, as it always is at Woodlawn. We continued to work hard at ensuring Woodlawn is a leader in its field and a benefit to the local area. We have achieved a lot of success onsite overhauling our container maintenance process, maintaining high gas collection, increasing evaporation and reducing the levels of our dams. We will continue to work with the community in order to improve outcomes for all. In the meantime, we hope you all have a merry Christmas and a happy and wonderful new year.

*From all the staff at the Woodlawn Eco-Precinct*

## Reporting to site

Your feedback is incredibly valuable as we measure the performance of our operations and odour management. To report incidents of odour, please fill out our online odour report form at [\*\*veolia.com/anz/WoodlawnEcoPrecinct\*\*](https://www.veolia.com/anz/WoodlawnEcoPrecinct), contact Veolia’s Community Feedback line on **1800 241 750** or simply send an email to [\*\*woodlawn@veolia.com\*\*](mailto:woodlawn@veolia.com). To report a leaking container please use the feedback line or email.