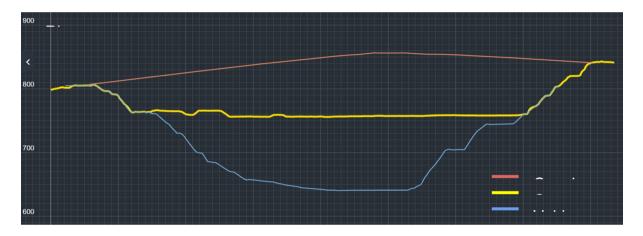
#### Woodlawn Eco Precinct Community Questions received February 2024

What is the current level / depth in the void? (Preferably in AHD/RL type values - for example the base of the mine is 630m AHD). We would like this information to compare how Veolia are progressing towards the final capping. A graph of this would be helpful.

The graph below shows the void base, current level and capping layer. There are a wide range of variables such as modelling for compaction and subsidence of the waste, leachate and gas generation and other auxiliary activities which can modify the operational life of the landfill. An estimate at this stage is between 25-30 additional years.



### Given the significant rainfall over the last few months, how well are Veolia's new processes for handling leachate working?

Veolia continues to manage leachate and acid mine drainage generated from mining activities. In 2023, we pursued significant additional infrastructure to manage this liquid, and as shown in the liquid inventory slides in the CLC presentation, we have been able to tolerate significant and continuous wet weather events with the improvements in place. Nonetheless, we are ambitious to further increase our resilience of anomalous sustained wet weather patterns such as multi-year La Niña events which fall outside the normal modelling scenarios such as 1 in 10 year rain events. To increase that resilience, we are progressing several high capital projects for additional containment and beneficial treatment and reuse capacity and these have planning instrument modifications before the regulators, described in the CLC presentation slide 25.

At the last two CLC meetings Veolia has refused to provide details on gas flaring. If details can't be provided, could you please indicate what percentage of gas is being flared? For example 10% of gas collected is being flared, 90% is being sent to the turbines for electricity generation. Could you provide a graph similar to the September 2022 newsletter?

At the last CLC meeting Veolia provided clarification on the flaring process, stating that:

- Flaring is carried out in accordance with licence conditions, which includes emission control requirements.
- Engines are operating at full capacity, and flares are used for any peaks or excess gas captured.
- Veolia expressed our willingness to further understand the context of the question as it relates to sensitive commercial information as part of an active contract.

In the absence of that context, similar questions were raised through the EPA, and Veolia informed them that as part of our EIS commitments to operate additional engines at peak gas generation, a review of future gas generation would be undertaken in 2024. This review will assess the viability of bringing additional generators online and the stages that would occur leading up to final capping and throughout landfill closure. Various factors will be considered in this review, including the composition of the gas and the ancillary infrastructure required.

#### Can Veolia provide availability data on the H2S sensors that have been installed? What percentage of time has each sensor been offline or in a degraded state (such as solar radiation data not being available)?

To provide clarity, the solar radiation sensor measures the irradiance from sunlight, not the H2S sensors. We are mindful of keeping the data dashboard clean and user-friendly for the community to access current state data to the community. We will work with the supplier to investigate the complexity of hosting uptime statistics and explore options to include them on relevant pages.

# Why has Veolia not released the November CLC meeting minutes on their website? (*I* note these have just been uploaded - could you please explain why there was a 2 month+ delay in the upload).

During the Christmas break, several of our key staff members that are involved with publishing content on the website took leave, and there was a delay in obtaining approvals. Moving forward, we will commit to having meeting minutes published within 2 weeks of the CLC meeting, except for public holidays. This timeline includes 7 days for Veolia to distribute draft minutes and 7 days for the CLC to provide input on the draft.

## When will the Independent Odour Audit conducted in 2023 be released to the public? The last three reports were finalised in December 2022, August 2021 and October 2020.

The Independent Odour Audit for 2023 has been submitted to the regulators. However, there is a currently a delay in procuring these services due to high demand. We have received improvement recommendations and are conducting follow-up testing as recommended by the initial audit. Once we receive the finalised data and submit it to the regulators, we will publish the reports in aggregate. The improvement recommendations included additional aerators in the dams; this has been completed and was discussed in previous CLC presentations.

### Why will it take 6 months for Veolia's response to submissions to be released to the public after the initial submission to the Department of Planning?

Veolia submitted our interim response to submission report to the Department of Planning and EPA at the end of last year. The document is significant at over 350 pages and has multiple updated technical reports. We are awaiting a gap analysis outcome from the government departments to establish any missing information. This outcome is anticipated to arrive in March. We will then work with our consultants to address the gap analysis outcome and update modelling as necessary. This process is estimated to take approximately 6 months, however we will be able to provide a more accurate time estimate once we have received the gap analysis outcome.

Veolia is endeavouring to respond to the concerns of the community as transparently and completely as possible to enable everyone who is interested to have a good understanding of what we are proposing and how it will operate. In some instances the submissions required new information to be prepared as the particular question had never been anticipated. We also need to confirm with the Department that responses are relevant, specific and understandable in their view.

### Has Veolia received the response to submissions gap analysis outcome from the NSW Government (Planning, EPA etc.)? What was the outcome?

We are still waiting the outcome from the gap analysis. Veolia has limited ability to influence the timing of outcome however it is expected this will be received in March.

### Why is it taking Veolia so long to respond to submissions when Veolia operates more than 60 incinerators in other places around the world?

As part of the project evaluation process and our commitment to community engagement we believe it is important to adequately address all submissions in our report. Each project is evaluated on its own merits and impacts, and government agencies review the specifics of each proposal individually against current guidelines.

There appears to be an increase of trucks carting rubbish, leachate and fill to and from Woodlawn on Braidwood road including clean away trucks. Many of these trucks seem oblivious to road rules, including overtaking on double yellow lines, completely ignoring multiple school zone speed limits or driving down the centre of the road forcing other road users off the road. Can Veolia please detail exactly how many and what trucks moving to and from Woodlawn use this road? Including Veolia trucks and all other trucks going to Woodlawn. Is this an increase? If so Why, by how much, and over what period. Noting the poor state of Braidwood road and the trucks regular dangerous driving, why are these things not being sent by train? It has come to light that Veolia has extended the hours in which it intends to move rubbish shipping containers from Crisps creek to Woodlawn via Tarago Road. The new hours being 6am to 10pm. Why has this information not been given to the community? Why the increase? Noting only recently Veolia agreed that having trucks on Tarago road in the

### dark was dangerous and would try to avoid this, why have you gone back on your word?

There is no leachate being transported by Veolia to or from the Woodlawn site. Additionally, there has been no increase in local tonnages as reported in the CLC presentation. If any trucks are using Braidwood road and coming to Woodlawn, this would be local waste and not waste generated in Sydney.

The operational hours of our licenced facilities are in compliance with ourEnvironment Protection Licences. We want to help the community be able to fact check any misinformation and access better information by sharing the regulatory register to locate these documents. Our licensed facilities in Tarago and their EPL numbers and EPA web pages are tabulated below, and can be accessed by the public. The alignment of the Bioreactor and IMF to have the same operating hours as identified in the approved consent was undertaken some time ago. The below registers include previous versions of those licences. Alternatively, you can search for these licences or other licences in NSW, at <u>https://app.epa.nsw.gov.au/prpoeoapp/</u>

Facility	EPL Number	EPL Webpage
Mechanical Biological Treatment Facility	20476	https://app.epa.nsw.gov.au/prpoeoapp/Detai I.aspx?instid=20476&id=20476&option=licen ce&searchrange=licence⦥=POEO%20 licence&prp=no&status=Issued
Woodlawn Bioreactor	11436	https://app.epa.nsw.gov.au/prpoeoapp/Detai l.aspx?instid=11436&id=11436&option=licen ce&searchrange=licence⦥=POEO%20 licence&prp=no&status=Issued
Crisps Creek Intermodal Facility (IMF)	11455	https://app.epa.nsw.gov.au/prpoeoapp/Detai l.aspx?instid=11455&id=11455&option=licen ce&searchrange=licence⦥=POEO%20 licence&prp=no&status=Issued

Is this a way to avoid other road users seeing your leaking rubbish containers, noting a rubbish container was filmed leaking on the back of a truck coming from Crisps Creek less than a month ago? How is having trucks going 40kms an hour in a 100km an hour zone in the dark on Tarago road safe for the community?

As stated above Veolia has the approval to transport waste at the times stated in our Environmental Protection Licences. We avoid transporting waste in the dark where we can.

Why is Veolia continuing to transport waste to Woodlawn in containers that leak? (This person reports seeing 2 leaking trucks after Veolia was issued with a prevention notice, one of which was a mew container). What are the results of the testing Veolia conducted on their containers to ensure no further leaks? What is involved in the testing? (What tests are performed?) Where do you source the huge amounts of water required for testing? How is Veolia acting on the testing findings given containers have been seen leaking even after all the testing? A transport container was seen leaking liquid on the hill leaving Crisps Creek. Please explain why the new containers are leaking and what Veolia is doing about this.

Veolia has improved and continues to improve its inspection procedures of all waste containers, which includes inspection of all containers at each of the following intervals:

- before and after loading at the transfer terminals where the containers originate from;
- on arrival at the Crisps Creek train terminal; and
- before tipping at the Bioreactor.

During the inspections referred to above, any identified faults or damage are noted and the faulty container is immediately removed from rotation until it has been satisfactorily repaired. Veolia is also currently implementing a preventative container maintenance process, designed and reviewed by an independent third party, that reflects current best practice. The container performance testing is to be implemented in an ongoing capacity, and will systematically test all containers within the fleet over the course of 24 months.

The leak test method was developed by an independent subject matter expert, Marloc Engineering. This third party was approved for use by the EPA for the specific task of reviewing the container management program and leak testing methods. The developed method is now a component of ongoing internal maintenance procedures. In short, the test method simulates the maximum angle measured on the route (8 degrees slope) with a significant volume of liquid in the container, determined by Marloc Engineering as conservatively to be 900 litres of water. The container is then raised to an 8 degree slope angle and, given that it is on that angle on the road for at most 5 minutes per run, we conservatively use a 15 minute test under those conditions to limit test the container for leaks.

The water used in leak testing is from onsite potable water supply.

There is an instance of a video of clear water shedding from a container on 17 January 2024. Veolia undertook an investigation into this matter which involved the following:

- Analysis of the video and photos;
- Analysis of environmental factors leading up to that incident;
- Inspection of the container; and
- Taking out of service and leak testing the container.

The results of the investigation were as follows:

- The video shows liquid falling from the side of the container at the side rear rather than at the back bottom seal. This is not consistent with a leak from the container.
- Rainfall was recorded the location of the container the day before and day of transportation.

- The integrity of the container was not compromised, and the sealing components of the container were functional.
- The leak test confirmed that the container did not leak.

It was concluded that the rainfall had pooled on the roof of the container and during transport ran down the side rear of the container. Rainfall as the liquid observed was further supported by it being described as "clear" by the notifier.

Veolia will continue to systematically and proactively inspect and leak test all containers within the fleet.

## Could Veolia please ensure the containers being used to transport waste on local roads are sufficiently clean to ensure the container numbers can be seen - they are often very dirty and it is impossible to identify the container numbers.

The Veolia operated containers transported between the Crisps Creek Intermodal Facility and the Woodlawn Eco Precinct are cleaned regularly, including on the outside. In some instances, containers are sold to customers who then use them to transport waste from regional areas to Woodlawn. In these cases, customers are responsible for ensuring the transport of waste complies with relevant regulations to Woodlawn.

#### Why did it take 3 months for Veolia to publish the CLC meeting minutes?

Internal review was delayed as several different teams had key personnel away over the holiday break. Moving forward, we have streamlined our approval and publishing processes to involve fewer people during holiday periods. We also are asking that feedback/comments from members into the draft minutes is undertaken with a reply all function.

# One person wants to pass on feedback that the odour is the worst thing that has happened to the town and would like to know how Veolia are going to fix that. 14. Odour from Woodlawn has increased again. Why? What is Veolia currently doing to prevent odour impacting the community?

Veolia has made a significant investment in the Woodlawn Eco Precinct and its supporting infrastructure as part of our ongoing efforts to rehabilitate the former lead mine site. We use both in-house and third party specialists tasked with understanding the science and engineering behind the bioreactor as it goes through its operational life, and they constantly implement improvements based on collected data and changing best practices. An important verification of our control measures and progress is the Independent Odour Audit which occurs each year.

To ensure the effectiveness of our control measures and track our progress, we conduct an Independent Odour Audit every year. This audit is carried out by a suitably qualified third party expert, currently The Odour Unit, who is approved by the regulator. They comprehensively assess the odour potential of each emission source on site and identify opportunities for improvement. We have voluntarily requested The Odour Unit return after we implement each improvement recommendation to evaluate the impact of the changes.

In response to community feedback, we have started including progress updates for each improvement opportunity in our Community Liaison Committee meeting presentations. You can find these updates on slides 23 and 24 of the February presentation.

Veolia's November Tarago Times article mentions the ARC particulate emissions being the same as 13 vehicles. Could you please explain what vehicles were used for this calculation, how long the vehicles were running for, what rate they were running at, and give a breakdown of the types and size of particulates that they emitted. Also, please describe any additional particulates that will be emitted by the incinerator that are not emitted by a vehicle. How many vehicles will it take to account for all the particulates generated by the incinerator and associated works when factoring in stack emissions and other waste material dust and transport and construction emissions etc? Please provide the breakdown figures.

The calculation is based on 13 European specification prime mover diesel trucks operating at highway speeds over the course of a full year. i.e. 13 trucks travelling at 100km/h continuously (8760 hours per year), covering the equivalent of 876,000 km per year or the equivalent of 26 trucks doing 12 hour shifts, based on PM10 particulates. For completeness, PM10 refers to all emission particulates sized 0.01mm and smaller. European trucks are generally more efficient and have lower emissions when compared to Australian trucks, therefore this represents a conservative estimate.

The diversion of waste to the ARC and away from the Bioreactor landfill will reduce particulate matter emissions associated with the movement of trucks on unpaved roads. Sources of air pollution during the construction phase are likely to be fugitive releases of particulate matter (earthworks, wind erosion of exposed areas, wheel-generated dust from the movement of plant and vehicles, etc) and pollutants associated with the combustion of diesel fuel (particulate matter, NOx, VOCs etc). Throughout the 3 year construction period, it is considered that the 6 month civil works phase will have the greatest potential for air pollutant emission generation. However, the emissions intensity during this phase is expected to be lower than approved operations across the Eco Precinct or future operations of the Eco Precinct with the operational project. Furthermore, any construction-related air pollution emissions will be generated well within Veolia-owned land and distant from surrounding sensitive receptors. Consequently, air quality impacts from the construction phase are expected to be lower than the current or future operational phases. Further information on particulates can be found in the air quality impact assessment appendix of the Woodlawn ARC EIS available on the NSW Government Planning Portal, accessible at https://www.planningportal.nsw.gov.au/major-projects/projects/woodlawnadvanced-energy-recovery-centre

### There was a traffic study completed previously that identified the number of trucks using various roads in the LGA. Are those numbers available?

It is understood the traffic study referred to is the Traffic Impact Assessment undertaken for the ARC State Significant Development. A link to this study is available on the Major Projects Portal ARC page, accessible at https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?Att achRef=SSD-21184278%2120221011T083648.842%20GMT

# Query raised on the EPA risk rating described in the Tarago Times. When was Veolia's EPA risk rating raised to high risk? What reasons did the EPA give for raising Veolia's risk rating?

The EPA have recently clarified this with Veolia, an updated version of this is located on the Veolia website at the hyperlink "2024 March Woodlawn Monthly Newsletter".

Veolia's response to the queries is as follows:

Veolia has identified that commentary about the risk rating in the Tarago Times was inaccurate and it apologises for the inaccuracy. Contrary to what was reported in the media, the risk-rating was raised in November 2023 following regulatory involvement for the incidents driven by three consecutive years of La Nina on-site and the interactions with both legacy and current water storage facilities. Despite the extreme conditions encountered by all of NSW during this three-year period, all water was contained on site.

The reporting error was derived from advice obtained from a Veolia staff member detached from the Woodlawn operations. When Veolia was made aware of the error in the Tarago Times article written by the CATTI group, staff did liaise with the EPA to discuss the issue. The author of the information in the article believed that the rating was always 3 (in line with the guideline). The positive note is now Veolia can aim to reduce this risk rating back to a 2 on completion of water improvement work, and site water management and operational processes.

Veolia acknowledges fault and confirms this was not an intentional effort to mislead the community. A review of Veolia's internal communication protocols is currently underway to prevent future communication errors.

Veolia views this as an isolated error which is not consistent with its efforts to readily identify and discuss with CLC members recent non-conformances. Veolia is committed to responding to its environmental and social challenges in a responsible manner, and it will continue to collaborate with CLC members in transparent and genuine fashion to address community concerns.

## Veolia claims to work to achieve a circular economy. What are you doing as a business that demonstrates you are avoiding and reducing waste given this is against your business model.

Veolia actively participates in several trade associations, including NWRIC, WMRR, ACOR, and APCO, to contribute to industry positions and advocate for improved regulations in the waste sector nationwide. Our goal is to accelerate the transition to a circular economy, benefiting the entire sector. We support various policy ideas to achieve this, such as strong product stewardship legislation, which encourages manufacturers to consider the end-of-life disposal of their products, promoting greater recyclability and diversion from landfill.

Additionally, we advocate for consistent legislation for food organics and garden organics (FOGO) to divert these materials from landfill and turn them into compost for reuse. We are also investing in Material Recycling Facility infrastructure to enhance recycling capabilities and Anaerobic Digestion infrastructure like EarthPower to reduce food wastage. Veolia is committed to raising awareness about product stewardship, circular economy requirements, and the need for investment, including in Energy from Waste solutions, to divert non-recyclable items from landfill.

Veolia views waste avoidance and reduction as integral to our business case. Our corporate mission is driven by a global commitment to achieve Ecological Transformation, which involves adapting, improving, and prioritising sustainable patterns of production and consumption. This commitment is based on improving biodiversity, decreasing pollution, fighting climate change, and optimising resources.

The development of a Circular Economy is fundamental to achieving Ecological Transformation and is guided by three principles: designing out waste and pollution, circulating products and materials at their highest value, and regenerating natural systems. Each of these factors requires long-term planning and persistent effort, as they necessitate widespread behavioural change to be effective.

Throughout Veolia's long history (founded in 1853 as Compagnie Générale des Eaux) the priority for our business has been to supply cleaner water, more reliable energy and safer more efficient waste management services to the community. Veolia has continued to advocate for the implementation of more advanced systems, technologies and methods of operation in every aspect of our commercial offering however it has taken time for the market to agree and commit to reprioritising the good of the environment over convenience and cost savings. The Woodlawn Bioreactor was designed to replace a waste disposal system which was more highly polluting, less well controlled and contributed significantly to GHG emissions. However Veolia has been unequivocal in its commitment to stepping up the Waste Hierarchy from modern landfill technology to energy recovery, recycling, reprocessing and waste avoidance. The guideline for Veolia's future business development and the anchor to its sustainability continue to be the pillars of ecological transformation - improving biodiversity, decreasing pollution, fighting climate change, and optimising resources. There is no doubt that the ecological priorities of our society are changing and Veolia's business model is purposed to both lead and benefit from this change.

Veolia plays a crucial role in helping Australia's largest manufacturers, producers, importers, and retailers develop sustainability strategies aligned with Circular Economy targets. The design and implementation of strategies by our Sustainability Team have helped Border Express achieve 60% landfill diversion, Telstra achieve 40% diversion and Department of Defence achieve 30% diversion. As a significant operator of recycling and reprocessing facilities, we provide expertise on the recoverability, recyclability, and processability of various materials and products. Our representation on the Board of APCO, the Australian Packaging Covenant Organisation, further demonstrates our leadership in advising on design for recovery and recyclability.

In addition to being a major collector, recycler, and materials trader locally, Veolia owns and operates around 300 materials recovery and reprocessing facilities globally. This strategic

positioning allows us to drive the transition from a linear economy to a circular one and benefit from it. Our expert knowledge of waste and recycling streams enables us to advise on the most appropriate approaches to recovering materials and products in a clean, highquality condition, minimising the need for disposal. We also prioritise waste education and collaborate with local government customers to deliver Education Plans that drive positive behavioural change, reduce contamination, increase recycling, and preserve the environment.

Veolia's core business operations in the water, energy, and waste sectors are focused on replenishing and renewing resources, reducing dependence, and developing sustainable solutions for a world with finite resources. We actively recycle and regenerate water supplies, develop renewable energy sources, and implement material redesign and recovery programs. Our commitment to long-term site rehabilitation is evident at the Woodlawn Eco Precinct and other sites where we operate.

## Supplementary questions/comments raised by CLC Members via email post the meeting (to be addressed in the next meeting)

1. KW: In relation to the regulatory registers for the facility EPLs (web links provided), I think that it is good to provide the links. The information is in the documentation, but it takes some effort to find out when the changes occured. Couldn't you have quoted variation number and date, for example Bioreactor variation 1506311 of 1 May 2013 changed the hours to operate. etc

Its clear to me the changes to operate for the extended hours are not new and have been in place for many years, (Bio 2013, IMF 2018, MBT 2017) What's confusing is that Woodlawn website advises that these are the new IMF operational times.

2. FJ: Mistrust is created if vehicle numbers are not disclosed and it would be easy for Veolia to provide them.

3. FJ: Report of Veolia truck on Bungendore road at 6:15am on 14th Feb in the dark. Is that in line with the transport hours Veolia has set?

4. KM: Regarding internal minutes review, if there is something in the minutes that management dislike, can the minutes be changed? Will the membership of the CLC be informed, what recourse does the CLC have, has management changed minutes in the past? If so why and when? Regarding the streamlining of meeting minutes approval and publishing were. Can you please elaborate?

5. FJ: Request some information about Jamie, his company, and its role with Veolia.

6. KW: Suggestion that new membership in the committee might warrant the need to review the Charter.

7. KW: Request to amend actions table in minutes to show action deadline and status.

8. FJ: Not in favour of 'feedback' being used to describe the Department's gap analysis of Veolia's response to submissions (for the reasons previously stated). Kathryn explained

this is a gap analysis when I queried use of the term 'feedback', and it should be reflected as such in the meeting discussions and this additional statement.