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Transpacific Industries Pty Ltd  
ABN: 40 010 745 383

Metropolitan Waste and Resource Recovery Group  
Level 4, Tower 4  
World Trade Centre  
18-38 Siddeley Street  
Melbourne VIC 3005  
[participate.metro@mwrrg.vic.gov.au](mailto:participate.metro@mwrrg.vic.gov.au)

Level 4, 441 St Kilda Road  
Melbourne VIC 3004 Australia  
PO Box 33166 Domain LPO  
Melbourne VIC 3004 Australia  
Phone: +61 7 3367 7800

Dear Sir/Madam,

**Consultation Draft Metropolitan Waste and Resource Recovery Implementation Plan 2015 -  
Cleanaway submission**

Thank you for the opportunity to provide comments on the consultation draft Metropolitan Waste and Resource Recovery Implementation Plan 2015 (Implementation Plan). The following sections and comments are of concern and/or feedback for consideration:

- **Chair Foreword, Pg 7:** paragraph around landfills is misleading. The current landfill capacity is enough to satisfy the states requirements especially with the introduction of Organics recycling and diversion from landfill, stated as 42% of the current volume sent to landfill. Whilst Cleanaway is supportive of Resource Recovery and diversion from landfill, the inference that landfill space is finite and not easily accessible, we believe is inaccurate and misleading to the public. Each of the 4 major landfills are strategically positioned in locations across Melbourne that are easily accessible and within 50kms from the Melbourne CBD (MRL – 30kms, Hanson – 48kms, Wyndham – 34kms and Suez – 40kms).

The BEPM guidelines, EPA licences (currently being updated) and stringent standards and legislative framework around the siting, design, construction and operation of a landfill ensure that the "social and environmental consequences" are managed accordingly and as an absolute and acceptable measure for handling Victoria's waste streams. These regulations are monitored and updated as new technologies/processes are derived guaranteeing Landfills maintain Best Practice Standards. Landfills are a strategic and important piece of infrastructure, more support and assistance with community engagement should be adopted to dispel their concerns.

Only a minority of the Victorian community oppose or are unaccepting of landfills. Most people detach from their waste once they have committed it to their garbage bin and placed it kerbside. There is an expectation that the garbage collector will handle it in the most environmentally sustainable and safe manner. It is expected that Council, Industry and Government have set standards to ensure no harm is caused to Victorians or our Environment.



- **Section 3: What material is still being sent to landfill? Pg 26:** the plan notes that the 2014 audit identified food and green waste to make up 42% of the volume going into landfill. The information highlights the challenges that such material presents when landfilled ie; gas and leachate however it does not reference the significant investment in infrastructure that landfill owners invest to manage and operate on site to handle these by-products on site, minimising the effect on the environment. The Cleanaway Melbourne Regional Landfill (MRL) presently has a Landfill Gas collection rate of 85% with 4.4MW of energy from waste now powering over 4,000 homes. A new project to double the capture of gas (to 8.8MW) through new infrastructure supplying power to 8,000 homes is currently underway. The statement reads that the environmental consequences are drastic yet do not make it clear to the reader that these are currently managed and managed well under strict guidelines and procedures.
- **Section 5.4: Infrastructure for treating residual waste, Pg 44:** the plan states that “residual treatment facilities are classified as resource recovery infrastructure”; it then goes on to say that these types of facilities process mixed waste primarily from the MSW and C&I sectors. Through the diversion of organic wastes from the MSW stream, this will remove up to 42% from the current landfill waste stream. C&I resource recovery opportunities can then be conducted prior to residual wastes sent to landfill. It is Cleanaway’s position at the new Transfer Station in the South East to allow for this capability.
- **Section 5.6.2: Location of metropolitan landfills, Pg 48:** it is misleading to advise that “...In recent times the catchment has eroded due to closures in the south east and availability in the North West for additional capacity”. Cleanaway’s plans to build a state of the art large capacity Transfer Station in the south east is our substitute to operating a landfill in the south east. Rather than vacating and not providing an essential service to the area, we are investing in the future of the waste industry by constructing and operating the South East Melbourne Transfer Station (SEMTS). Working with Councils to encourage and educate the diversion of organic waste from the MSW collections as well as looking at opportunities to conduct C&I / C&D resource recovery with the residual wastes going to our Melbourne Regional Landfill, aligns with the SWRRIP priority actions.
- **Section 5.6.5: Short to medium term closures of south east landfills, Pg 53:** “to ensure disposal costs remain comparable for south east waste generators, it is expected that significant investment in transfer stations in the south east will be needed to consolidate this waste for bulk hauling to the north west” – as MWRRG is fully aware, Cleanaway has received a Council planning approval for the SEMTS to be constructed in the south east region by early 2017. This transfer station’s capacity is designed to handle increased volumes than is presently received into the two active landfills operated today. This statement could be reflected in a more positive manner advising of what will happen rather than what needs to happen.
- **Section 5.6.6: Contingency Planning, Pg 53:** Cleanaway has concern over the following points reflected in the Contingency Planning notes:

  - “failure of the landfilling industry to progressively plan the development of existing sites and landfill cells...” – much of this planning and approvals cycle is affected by the governing parties, EPA. There is a current lack of resources and technical specialists within EPA to sign off on these requirements which has a flow on effect to the landfill operators and often acceptance of waste into the landfill. The issues from external parties should not reflect poorly on the landfill operators.
  - “an existing/proposed facility not receiving a required regulatory approval for operation within expected timeframes” – as above, due to lack of resources the EPA cannot always

ensure sign off within timeframes, as such delays are caused and the waste industry experience the ramifications.

- “failure of industry to operate as planned and/or contracted which can inadvertently result in potential stockpiling of source materials...” – stockpiling usually only occurs when there is no end market in place or there is a surplus of materials. If MWRRG and the State Government are going to drive Resource Recovery, then there also needs to be the engagement with industry to assist with end market solutions. For example; there is no point in recovering timber and diverting it from landfill if there is no solution to handle it. Stockpiling causes a multitude of problems; environmental hazards, costs, potential for operators to walk away etc...
- **Section 6.2.3: Social licence to operate, Pg 55:** Cleanaway is dedicated to community consultation having a Community Stakeholder Engagement Manager who works with our Community Consultation Groups (CCG’s) for our landfills and transfer stations. We agree that consultation to educate, respond to community concerns and provide transparency to processes is essential to operate effectively. However, we encourage involvement and assistance from MWRRG, Sustainability Victoria and EPA to help deliver key messages around Best Practice, governance and regulation of members in the waste industry. The community has trust in these regulatory bodies to ensure we as operators are acting responsibly; the social licence to operate message needs to be delivered in partnership.
- **Section 7.4: Transport, Pg 60:** “...when the south east landfills close progressively over the next 3-20 years, waste will move to the north west if alternative options are not provided in the south east...”. It is noted that the plan indicates an unlikely adverse impact which is consistent with Cleanaway beliefs. The information in the plan discusses the impact on the freight transport network assuming that single waste trucks would be required to carry the waste over to the North West once the landfills in the south east close. This assumption is incorrect as the SEMTS being constructed in the south east will facilitate both Commercial C&I and Council MSW waste collections which will then be bulk hauled by one carrier over to the North West. This will be consolidated volumes >30tonnes payload. Thus the impact on the freeways and transport network will be negligible.
- **Section 8: Metropolitan analysis of hubs, Table 13, Pg 65:** the information under the Deer Park precinct, requires the following to be removed or changed:
  - Deer Park to be referred to as Ravenhall precinct
  - Remove reference to Asbestos as this is no longer received under our EPA licence
  - Remove reference to Organics recovery and C&D recovery, neither occur on site
  - Is the reference to 20,000 residents correct? It seems too high
  - Under Future considerations: Cleanaway recommends the statement outlining “community concern” be changed to “In the past there has been some community concern with odour, however with the ceased operations of a nearby composter (Pinegro) these concerns have reduced significantly” – last month only 4 complaints were received due to odour. With the new gas infrastructure soon to be installed at MRL, this will reduce even further the possibility of odour.
- **Section 8: Metropolitan analysis of hubs, Table 13, Pg 69:** the information under the Kingston/Clayton/Dingley precinct which states the ‘Notice of Decision to Grant a permit issued on the 23 October, 2015’ for the Cleanaway South East Melbourne Transfer Station should be updated to reflect ‘a planning approval was granted on 19<sup>th</sup> November, 2015’

- **Section 9: Metropolitan needs analysis, Table 14, Pg 71:** claiming that there is a “critical gap in the infrastructure network” because there is no current ARRT facility is misleading. Again with the imminent diversion of 42% of the waste stream to landfill through Organics recycling plus the existing and new resource recovery practices engaged by industry to state that a critical gap in the next 10 years without an ARRT is misrepresentative. The following section of the table also goes on to state there is “a current over supply of C&D processing capacity which will ensure sufficient availability for the next 10 years”
- **Section 11: Part A – Existing resource recovery and reprocessing infrastructure schedule, Table 18, Pg 79:** under Green Waste, the current Cleanaway (Transpacific Waste Management) Victory Rd greens processing facility is missing from the list.
- **Section 11.2.1: Future landfill schedule – sequencing of landfill closure dates, Pg 86:** the last paragraph states that “private sector ...should consider the need for co-locating resource recovery operations at landfills”. Transfer Stations currently owned by Cleanaway (5 across Melbourne) can operate as resource recovery sites removing the need for a ‘co-located’ resource recovery facility at the Melbourne Regional Landfill. With Brooklyn and the SEMTS both receiving commercial volumes of waste, these sites can ensure resource recovery occurs prior to bulk hauling the material to landfill. Co-location is ideal, but not a necessity.
- **Section 11.3: Infrastructure schedule discussion, Table 22, Pg 88:** listed under the Assumptions of Priority 1 and 2, it is unclear where the Scenario A reference to 1 municipal residual treatment plant is built with a 400,000tonnes/year capacity. How has MWRRG obtained the 400,000tonne volume? Does this volume include organics and does it solely refer to MSW wastes?
- **Section 11.3: MWRRG proposed strategy, Pg 89:** states “undertake a mid-term review of the Metropolitan Implementation plan....” Cleanaway fully supports the 3 points addressed to review all the priority actions, assess the impact on resource recovery and landfill markets and determine the need for long term landfilling. With particular interest in the last point re long term landfilling, Cleanaway would like to see engagement and consultation with the landfill owners to understand the airspace availability, planning works, future opportunities before any decisions are made or published by MWRRG.

Throughout the entire MWRRG Implementation Plan please change any reference to Transpacific or TPI with Cleanaway.

Again, thank you for the opportunity to provide industry feedback on the Implementation plan. If you would like to discuss any of the comments or information provided, please do not hesitate to contact me on the details below.

Yours Sincerely,

**Melinda Lizza**  
**Business Development Manager | Post Collection - VIC**  
46 Victory Road, Clarinda VIC 3169 Australia

