



Rob Millard
Metropolitan Waste and Resource Recovery
Group
Tower 4, Level 4
18 – 38 Siddeley St
Melbourne

17 December 2015

Dear Sir,

Re: Comments on the Draft Metropolitan Waste and Resource Recovery Implementation Plan

We congratulate MWRRG on the release of the Waste and Resource Recovery Implementation Plan. Long term planning is an essential part of waste management and this draft plan is a significant step in the planning process for Melbourne.

We do have a several comments to make with regard to landfill planning.

It is clear from MWRRGs own predictions that landfill space will be at a premium in south east Melbourne in the short to medium term, with the bulk of the required capacity to be taken to landfills in the west and north of the city in 10 -15 years. Whilst this is technically possible, there is concern that the additional vehicle movements from the east to the west will put strain on the traffic network and that it will be difficult to efficiently operate a transfer system during peak periods of road use. Further, as in the recent past there have been a number of closures of significant transport assets, such as the Burnley / Domain tunnel and the Westgate Bridge – unavoidable delays can be expected.

In addition to the traffic issue a natural disaster or unforeseen landfill closure will put an unacceptable strain on the waste collection fleet – both municipal and commercial – and potentially see waste left uncollected.

For these reasons Veolia recommends that additional landfill proposals with the potential to service the south east be developed without delay.

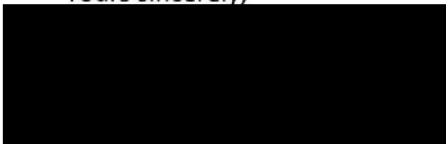
We believe establishment of energy from waste (EfW) facilities is a worthy aspiration. The approach of colocation with existing waste infrastructure is logical. Energy from waste has the ability to displace fossil fuel use and reduce carbon emissions, which has gained even more significance in the light of the recent COP21 outcomes. The most efficient and reliable form of energy from waste (residual MSW), mass burn moving grate incineration – is a proven technology that we believe will have a place in Melbourne within the next 20 years. However, this technology is expensive and would take a number of years to plan, permit, build and commission. Therefore, significant support would be required from Government and allied agencies to make the construction of such a facility possible.



Given the long lead time for EfW facilities, we do not believe they should not be regarded as an immediate panacea for landfill but more likely a complementary treatment to reduce the landfill of organics. Further, it should not be assumed that community acceptance of such facilities will be any more positive than the level of acceptance for a landfill.

We are available to discuss this further should you have any queries.

Yours sincerely,



Simon Tori
State General Manager, Victoria / Tasmania