

## **Submission: Petition No 19 – Disposal of Metropolitan Waste in Rural Areas**

The purpose of the petition initiated by the Avon Valley Environmental Society is to seek to have the Environmental Protection Authority complete a full and rigorous environmental impact assessment of the proposed Opal Vale Pty Ltd Class 11 Landfill site at Lot 11 Chitty Road Toodyay and the SITA, Class 11/111 Landfill at Allawuna, York. It is my informed opinion that the initial decision made by the EPA not to conduct an independent and impartial assessment of these sites was based on incorrect information. As an example, I refer the Committee to the information provided by Opal Vale to the EPA which states “Williamson’s Pit is located on the crest of a hill”. Geological information will in fact confirm Williamson’s Pit is situated in a very obvious headwater basin. The photos included pictorially demonstrate this fact. The Submission to the EPA made by myself and dated 20<sup>th</sup> August 2013 highlights numerous examples where information has been misrepresented.

It is the strong belief of the Avon Valley Environmental Society, of our network, and of myself, that the EPA has not met their fundamental purpose in this matter. That any proposed landfill site can avoid proper assessment by an agency whose primary purpose would propose to be environmental protection appears to me to demonstrate a gross deficiency in the way landfill approvals are determined. In the instance of Opal Vale it is my understanding that the EPA have not conducted a site visitation, in this instance information provided to the EPA by Opal Vale could easily have been determined to be incorrect via a visit.

International Geotechnical Criteria recognise five fatal flaws of landfill siting:

1. On top of a fractured rock aquifer
2. On a headwater basin where very intense storms are possible
3. Within close reach of groundwater including significant subsurface flows
4. In a region prone to strong earthquakes (Toodyay and York sites located in Zone 1, most active zone within the South West Seismic Zone - SWSZ)
5. With a conjunction of natural geologic loads or hazards e.g. SWSZ (largest & most active in Australia & most unpredictable in the world)

Independent assessment by the EPA will no doubt confirm the proposed Opal Vale Toodyay site and SITA Allawuna York site are each subject to all of the five fatal flaws. The onus of research into such matters should rest with the EPA, not as it has in this instance, with private individuals. In conducting an independent assessment the EPA will discover, as I have, overwhelming evidence that would support this petitions purpose in determining both these sites to be grossly unsuitable due to multiple environmental factors. In the two pages I have for my submission I feel my space is best utilised to expand on other pressing issues not as glaringly obvious as the environmental ones.

While environmental degradation is this petitions predominate concern, one of the many other issues making the Toodyay and York sites unfeasible is transport. The Toodyay-Gidgegannup Road is already at capacity as reported by Main Roads and is recognised as being unable to carry its existing load of heavy vehicles. Additionally the Great Southern Highway is unable to support the feed in of multiple heavy loads from the Great Eastern Highway. The information provided to the EPA by the site developers of Allawuna and Opal Vale did not accurately convey this, again a visit by the EPA to each site would have made this obvious.

In considering transport and roads as associated with landfill it appears to me that landfill site planning (or lack thereof) occurs in isolation to other planning needs such as food security, water management & conservation, population growth, education and other industry such as bauxite mine exploration. It appears to be an enormously evident and woeful fact that landfill approvals are considered independent of other organisations such as Main Roads, DEC, WA Planning Commission, WALGA. If landfill in WA is to be approached in an inclusive manner, then the need for a more thorough planning approval is evident. If the Committee deemed the matter of depositing landfill in

the peri urban fringe to warrant an enquiry then I hope the terms of such an enquiry would extend to how best manage planning in the future and in consideration of the new State Planning Strategy 2050 draft soon to be released.

As a result of the State Planning Strategy 2050 forum of 11.12.13, the Department of Food and Agriculture, the Curtin Institute of Agricultural Food Security and the Department of Planning recognised the necessity for the extension of the peri urban eastern corridor to be extended to include the Avon Valley as the tenth zone food precinct which must be preserved for water and food so as to provide fresh food supplies to the metropolitan area. The State Planning Strategy recognised there is a lack of a cohesive direction in waste management. With Western Australia population estimated to increase to 5.4 million the need for a coordinated approach to waste management is essential.

I also put forward my view that the Western Australian government via its Waste Management Authority's Waste Strategy: Creating the Right Environment, the Waste Hierarchy model and other researched campaigns such as Zero Waste have been misrepresentative of their intent. WA has failed to adopt its own waste management hierarchy model and continues to be one of the developed world's least progressive waste managers and falls well behind other states such as South Australia when it comes to waste and resource recovery. We really can & need to do so much better and if we, with purpose, recommitted ourselves to existing policy then the objectives of the Waste Strategy and towards Zero Waste could be achieved.

A further consideration around landfill approvals that I would seek this Committee to clarify is the roles and relationships between private business operators associated with landfill such as SITA and Opal Vale and other related organisations such as New Energy Corp and Global Construction Services (GCS). In this matter I would ask that the Committee determine how best to ensure the potential to self-monitor landfill sites does not exist. I would also ask the Committee to explore what potential exists for existing landfill sites such as Red Hill, Millar Road, Henderson and Bannister to be utilised to accommodate additional waste. It is my understanding that Red Hill alone has enough air-space capacity to accommodate a considerably higher load than it currently does. If this is indeed the case I query why it is necessary for private developers to expand operations into rural areas?

Waste must be managed and deposited somewhere - myself, the Avon Valley Environmental Society, and the Avon & Hills Environmental Protection Group recognise this fact. It is the manner in which planning occurs for waste management and landfill and the unsuitability of the current proposed sites that is objectionable. We seek only that this government do not further harm the vulnerable urban fringe and commit to better planning in the future.

Alice Bernal