

EPA Response

Amanjit Gill

December 10, 2024

1 Omission of Pertinent Information

So the 24-hour max is for the tipping hall, not for the sealed containers waiting outside; how long do the outside containers stay? if a while, does odour and fire risk management take account of extended stays?

what are abnormal operating conditions? is it in emergency, or is it something like an unusually busy day?

how will you know how much of the waste in the mixed industrial truck is putrescible?

2 Consequential Errors

mixed up eastern and western

3 Unsound Case for Site Selection

3.1 Linkage to State Government Documents

Sections 8.1.1 to 8.1.4 reference several state government documents to build an argument for the selection of the Hallam Rd site for the WTS. While these documents make a case for the need for a WTS, they fail to make any case for a WTS located specifically at the Hallam Rd landfill site:

- Plan Melbourne 2017-2050 [1]: No mention of Hallam Road landfill.
- Recycling Victoria - A New Economy [2]: No mention of Hallam Road landfill.
- Statewide Waste and Resource Recovery Infrastructure Plan [3]: Section 3.3.2, table 3.2, lists Hallam Road Landfill among the "hubs of state importance". It provides a brief description of current operations and future challenges, suggesting resource recovery as a way to conserve airspace. Activities such as that proposed in the application are not mentioned in this table, or anywhere else, in the context of the Hallam Road site.
- Metropolitan Waste and Resource Recovery Implementation Plan [4]: The introduction to section 6 lists Hallam Road among those sites with capacity challenges. It proposes the diversion of organic waste away from landfill. Section 6.2 suggests resource recovery as a potential future use of closed landfills, without mentioning any specific site. Section 8.1.2, table 15, contains similar text to that quoted from [3].

3.2 Commercial Argument

Section 8.1.5 states "it is necessary that the upgraded Transfer Station, which is the subject of this Development Licence Application, be operable by the time construction of the EfW plant is completed in approximately 2026".

This is an irrelevant argument, because there is no environmental imperative for ensuring the proposed WTS is built to Veolia's preferred timetable. It is not inherently unsafe or risky for the Maryvale EfW (energy from waste) plant to idly wait for waste input. The risk is entirely commercial.

Veolia is part of the consortium that will deliver the Maryvale plant [5]. This means it can exert control over both the Maryvale and Hampton Park developments. Therefore, if the commercial risk was so serious, it could have located an alternative site for the WTS and started the development earlier instead of waiting for the landfill to close.

3.3 Linkage to Casey Council Strategic Planning

In section 8.2.1, the applicant references the council’s Hampton Park Hill Development Plan [6], stating “the subject site of the proposed Hampton Park WTS is indicated as land for ‘Waste and Resource Recovery’ and as such the use and development of the land for a Waste Transfer Station is consistent with the adopted development plan”.

However, the cited Development Plan does not clarify that a future facility on the site may process putrescible waste; it only discusses putrescible waste in the context of existing landfill operations.

The Development Plan cites the state government’s Hallam Road Waste and Resource Recovery Hub Plan [7], which briefly mentions the potential to “aggregate and consolidate putrescible kerbside material” at the site. Unlike [6], this Hub Plan was never exhibited for community consultation, and the Development Plan never alludes to its contemplations regarding putrescible waste.

In addition, the Development Plan uses the phrase “waste transfer” only once, with no elaboration other than the amenity-related requirements listed in section 4.2. Given there is already a waste transfer station on the site [8], and all 265 transfer stations in Victoria are “resource recovery centres” with various purposes [9], one cannot infer from the Development Plan alone that the Hallam Road site may be earmarked for large-scale compaction of putrescible waste.

Therefore, if Veolia intends to suggest prior community awareness and acceptance of a WTS at the Hallam Road landfill site, it cannot do so on the basis of the Development Plan.

3.4 Lack of Options Analysis

Not only has the applicant failed to mount a substantive case for locating the proposed WTS at the Hallam Road landfill site, it has also failed to give due consideration to alternative sites. This is notable because the proposed facility will service nine municipalities [10]; it is unlikely that other suitable sites do not exist.

In order for a major project decision to inspire confidence, it must be tethered to a defensible decision-making process. To this end, Infrastructure Australia provides guidance on Multi-Criteria Decision Analysis [11], the Victorian government offers advice on its IMS (investment management standard) [12], and several examples of options assessment are available, such as that for offshore wind transmission [13].

In the absence of evidence that some form of methodical decision-making process has occurred, Veolia’s argument on site selection lacks credibility.

4 Assertions without Evidence

5 Fit and Proper

References

- [1] Department of Transport and Planning. *Plan Melbourne 2017-2050*. https://www.planning.vic.gov.au/__data/assets/pdf_file/0025/654550/Plan_Melbourne_2017-2050_Strategy_.pdf. 2017.
- [2] Department of Environment, Land, Water and Planning. *Recycling Victoria - A New Economy*. <https://www.vic.gov.au/victorias-plan-circular-economy>. 2020.
- [3] Sustainability Victoria. *Statewide Waste and Resource Recovery Infrastructure Plan*. <https://assets.sustainability.vic.gov.au/asset-download/Plan-Statewide-Waste-and-Resource-Recovery-Infrastructure-Plan-Victoria-2018.pdf>. 2018.
- [4] Metropolitan Waste and Resource Recovery Group. *Metropolitan Waste and Resource Recovery Implementation Plan*. <https://assets.sustainability.vic.gov.au/susvic/RWRRIP-Metro-Waste-and-Resource-Recovery-Implementation-Plan-2016.pdf>. 2016.

- [5] Veolia Australia and New Zealand. *Maryvale Energy from Waste Facility, Victoria*. <https://www.anz.veolia.com/our-facilities/energy-from-waste/maryvale>. 2022.
- [6] City of Casey. *Hampton Park Hill Development Plan*. <https://conversations.casey.vic.gov.au/hampton-park-hill-initial-public-consultation/development-plan>. 2023.
- [7] Metropolitan Waste and Resource Recovery Group. *Hallam Road Waste and Resource Recovery Hub*. https://hdp-au-prod-app-csy-conversations-files.s3.ap-southeast-2.amazonaws.com/1416/5715/1404/Hub_Plan_Hallam_Road_210121_FINAL_web.pdf. 2021.
- [8] Veolia Australia and New Zealand. *Hampton Park Outlook Transfer Station*. <https://www.anz.veolia.com/our-facilities/transfer-stations/hampton-park-outlook-transfer-station>. 2024.
- [9] Department of Energy, Environment and Climate Action. *Victoria's waste and resource recovery infrastructure map*. <https://www.vic.gov.au/victorias-waste-and-resource-recovery-infrastructure-map>. 2024.
- [10] City of Casey. *The future of waste in Casey*. <https://www.casey.vic.gov.au/future-of-waste-casey>. 2024.
- [11] Infrastructure Australia. *Guide to Multi-Criteria Analysis*. <https://www.infrastructureaustralia.gov.au/guide-multi-criteria-analysis>. 2021.
- [12] Department of Treasury And Finance. *Facilitator Guidance and Templates*. <https://www.dtf.vic.gov.au/facilitator-guidance-and-templates>. 2017.
- [13] Department of Energy, Environment and Climate Action. *VicGrid Offshore Wind Transmission - Draft Options Assessment Method*. <https://engage.vic.gov.au/download/document/32087>. 2023.