South East
METROPOLITAN REGIONAL COUNCIL

SEMRC RESPONSE TO

Draft Site and Technology Selection Criteria

Community Consultation

December 2006

1. INTRODUCTION

The South East Metropolitan Regional Council (SEMRC) commissioned Environmental Resources Management (Australia) (ERM) to undertake a community engagement process to assist the SEMRC in identifying strengths, weaknesses and gaps in its draft site and technology selection criteria for the possible development of a resource recovery facility servicing the south east region of Perth, and including the local government areas of South Perth, Gosnells Armadale, Mandurah, Murray and possibly Serpentine-Jarrahdale.

The SEMRC has closely involved its Community Reference Group in the development of the draft Selection Criteria over a period of more than twelve months. While the SEMRC is the decision-making body it has recognised the importance of involving the community and listening to community concerns relevant to this proposal. It has provided an undertaking to the participants in the community engagement process and the CRG members to respond to recommendations and provide a written response to those suggestions and recommendations. This document provides the SEMRC response to the issues raised as part of this community engagement project.

2. WHAT IS A REGIONAL RESOURCE RECOVERY FACILITY?

A resource recovery facility (RRF) processes primarily household waste. This may include the following:

- materials recycling facility - where recyclables are sorted, packed and sold for reuse;
- composting plant – where domestic rubbish is processed and converted to a soil conditioner;
- green waste processing – where green waste (garden waste, tree loppings) is processed and chipped, mulched and possibly composted;

It may also house an education centre – where environmental education activities may be undertaken.

3. WHY WE NEED AN ALTERNATIVE WAY TO TREAT OUR WASTE

Nearly 150,000 tonnes of household waste is generated in the region each year. While a great deal of effort goes into recycling, thereby diverting about 20% of household waste from landfill, we currently send most of the remaining 120,000 tonnes to landfill. There is limited space left in the remaining land fills servicing the Perth region, with possible life expectancy of those landfills being another 6 – 8 years. Landfilling our waste is not an environmentally sustainable activity. It has the potential to create problems with greenhouse gas generation, cause leachates to enter out ground water and alienate large tracts of land for alternative uses.

The state government has a policy of moving towards zero waste by 2020. The SEMRC recognises that while this may not be achievable, it is possible, given today's technology,

to substantially reduce the level of waste which does go to landfill, conserving scarce land fill resources for material which is generally benign, being mainly inert material such as broken crockery.

While waste education, establishing extended producer responsibility programs and general waste reduction are some measures which can and will be taken, developing alternative waste treatment processing is the only real alternative currently available to us. We can aim to reduce the general level of waste generated on a per capita basis but the expanding population of the region means that we still need to find ways to treat the waste which is generated.

4. BACKGROUND TO DRAFT SITE AND TECHNOLOGY SELECTION CRITERIA.

In developing the draft site and technology selection criteria, the SEMRC made four key decisions: These were:

1. Incineration technology would not be considered as the primary means of waste treatment. This decision was made as it was considered that the community would not accept incineration technology at this time;
2. Landfill of any description would not be considered as the primary means of waste treatment as it was not considered to be the best use for the resources contained within our household waste;
3. The Community Reference Group would be closely involved in the development of draft site and technology selection criteria;
4. The site selection criteria process used by the State Government's Core Consultative Committee (3C) would be used as the starting point for the development of site selection criteria, with appropriate variations given that the material is primarily household domestic wast and not hazardous waste.

5. PROCESS FOR SITE SELECTION

Once the site selection criteria are finalised, the criteria will be applied, using a Geographic Information System, across the region, to identify possible sites. These will be reviewed on the basis of a triple bottom line assessment which will consider the following:

- Whole of life costs including transport costs and emissions generated by transporting material to the site;
- Proximity to the waste sources (population centres and indicative growth areas); and
- Security of tenure and future encroachment by settlement;

Each shortlisted site will be subjected to a rigorous triple bottom line assessment of its costs and benefits, in order to reduce the number of possible sites to around five.

When there is a short list of around five possible sites, a second round of community consultation will take place, with particular focus on the communities which may perceive to be affected by the choice of sites.

6. SEMRC RESPONSE TO ISSUES RAISED.

The following table identifies the key findings of the community engagement plan and responds to those issues.

Major Concerns identified in ERM Report (taken from the ERM Report)	SEMRC RESPONSE
adequate separation distances (which are not well understood, and the actual distances being the subject of much discussion);	**Noted.** The SEMRC recognises this concern. While there was much discussion on what was adequate, no firm recommendation was resolved. The SEMRC will apply the selection criteria at 750 metres and note where sites may achieve greater separation distances.
the importance of effective management tools to guarantee the minimisation of the impact on the surrounding community and environment;	**Agreed.** The SEMRC will identify the necessary management tools that need to be incorporated into any contractual arrangement in order to provide for minimising adverse impact on surrounding areas
essential protection of groundwater resources;	**Agreed.** The selection criteria which requires a site to be one metre above the 1 in 20 ARI will be amended to read the 1 in 100 ARI.
transportation of waste to and from the site;	**Agreed.** When there is a short list of sites it will be possible to consider the economies and overall sustainability of developing transfer stations as part of the total waste management package for the region. Proximity to major transport routes and minimising impact on local roads is a key criteria.
the protection of areas of conservation value	**Agreed.** Any sites should support the protection of areas of high conservation value

Other Issues Identified in ERM Report	SEMRC Response
distance from the water sources;	This concern relates to water flow and potential for surface water to be contaminated. While in a fully enclosed facility this is extremely unlikely, the SEMRC will adjust the criteria relating to distance from the ARI to 1:100 ARI
volume to transport (minimum);	This relates to the number of truck movements which may be experienced on local roads. Once there is a short list of possible sites, this will be reviewed through a triple bottom line assessment of each site.
different separation distances required for enclosed and open facilities;	**Agreed,** however, a technology selection criterian is that it is all enclosed. It is recognised that some decisions will need to be made regarding whether or not green waste will be processed at the proposed facility. In making this decision, the community concern regarding an open system for green waste treatment will be considered.
different criteria for handling of green waste;	See above
a criterian which accounts for prevailing winds;	**Noted.** The SEMRC recognises the concern raised, especially in the context of odour control. When there is final short list of sites, the sites will be subject to siting and modelling for climate to assess their viability.
the likely level of community support/past experience of neighbours;	**Noted. This i**ndicates need for additional community engagement when sites are short listed. This will form part of the second round of community engagement.
full-cost accounting of social and environmental externalities in technology and site selection;	**Agreed** The financial model being developed is a full cost-accounting model
arms-length monitoring of safeguards to protect the environment and community	**Agreed.** The SEMRC endorses the view that a community advisory committee

amenity;	working with the facility's operators when it is established will benefit the community.
design for plant upset/contingency in the event of failure; and	**Agreed.** This is considered to be a management issues which is important for two reasons – what happens to the waste that continues to be generated and managing any adverse impacts from equipment failure.
compensation mechanisms in the event of performance failure.	**Noted.** This is a matter which the SEMRC will consider incorporating into a contract as part of the risk management elements of a contract.
Future Consultation identified in ERM Report	**SEMRC Response**
Stage 5 – Preliminary Assessment of Sites & Technologies It is advisable that all Forum participants are engaged in an ongoing basis. The level of engagement will change over the life of the project, but is seen as very important	**Agreed.** In response to this recommendation, it is considered appropriate to provide all forum participants with a copy of the Executive Summary of the report and the SEMRC response, including a summary of the process for future community engagement. One of the criticisms of the engagement process was that there was insufficient information to enable the community to make informed decisions. With this in mind, it is considered that before any further community engagement takes place, the amended selection criteria will be applied to the GIS system to identify possible sites. These will then be reviewed for known flaws (for example, site east of the Darling Scarp will incur substantially more transport costs and will be further away from the growing population centres) and reduced to approximately ten sites. These ten sites will then be further examined and site inspections undertaken. The consultants will then review the sites in relation to all the criteria and the location in relation to

	population centres to reduce the number of short listed sites to 5. At this point, it is proposed that, following further investigation, a second round of community engagement take place.
Stage 7 Preferred Sites and Technologies: Extensive engagement is required to demonstrate how and why the preferred sites were chosen. Consultation from this stage forward must be very clear on the opportunities the community has to engage with the Feasibility study and the types and purpose of engagement activities.	**Agreed.** This should form the basis of the second round of community engagement once sites are short listed.
Stage 10 Staging of the Project: Consultation of an even higher intensity level to that in Stage 7 will be required once sites have been short listed, preferred technologies determined and a business plan has been adopted as this is when the Feasibility Study is most likely to come under most public scrutiny.	**Agreed.** If the proposal is feasible, a business plan will be developed which will be the subject of a six week community comment period.
ERM recommendations	**SEMRC Response**
A comprehensive education campaign should be conducted in parallel to the Feasibility Study.	**Agreed.** The SEMRC will develop a draft outline and budget for such a program. This will probably require a budget variation and will be available for consideration in February
South East Metropolitan Regional Council continue with its positive and transparent approach to the Feasibility Study process.	**Noted.** The use of Waste-Less Words to be investigated as an avenue for additional information dissemination and information points in libraries upgraded
In order to further facilitate an understanding of how these criteria will be applied, there is	**Noted.** It may be possible to undertake such an exercise with the CRG and

value in working with selected external stakeholders in a Multi-Criteria Analysis workshop.	possibly other members of the consultation process should the CRG members feel they would like to participate in such an exercise.
Continue to test the views of this group (CRG), with wider activities to gauge the issues and concerns of a broader cross section of the community	**Agreed.** The CRG will continue to play a very important role in the project as sites are shortlisted and considered.