

18 December 2015

Rosalie Woodruff

Tasmanian Greens

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Via email: rosaliewoodruff@gmail.com



Dear Ms Woodruff

I am writing to you in response to your Notice of Motion in the Tasmanian Parliament regarding Southern Waste Solutions' proposed controlled waste facility (C-cell) at Copping.

Firstly, I want to thank you for your interest in this matter and invite you and your colleagues to a personal briefing about the C-cell, where I hope we can come to a shared understanding about the facility's purpose and function.

For now, I can assure you that all design work thus far has been approved by the Tasmanian Environment Protection Authority (EPA) against the Tasmanian Government's 2004 *Landfill Sustainability Guide*. The concept design was also assessed against the more rigorous Victorian EPA's guidelines, which were updated earlier this year. The concept design of the Copping C-cell either meets or exceeds all the requirements of both sets of guidelines and Southern Waste Solutions is confident it is leading the nation in this regard.

The C-cell is due to begin construction before June 2016 and the EPA requires that the detailed design, its technical specifications and its construction quality assurance plan are all subject to an independent expert peer review, prior to their submission to the EPA for approval. Again, we are confident of meeting this requirement.

The need for a C-cell in Tasmania has long been recognised. A state wide industrial waste survey was undertaken in 1991. This led to the 1994 *Tasmanian Hazardous Waste Strategy*, which canvassed the need for land disposal of hazardous wastes.

The 2008 Sustainable Infrastructure Australia *Current and Future Controlled Waste Practices in Tasmania* report stated the following:

"Tasmania currently does not have landfills or processing facilities that are fully compliant with modern best practice standard for 'secure' landfills."

"In addition to considerable economic impacts, inadequate controlled waste management facilities and practices have the potential to result in significant harm to the environment and may also have adverse effects on human health."

The Tasmanian Government's 2009 *Waste and Resource Management Strategy* also called for improved infrastructure for the management of controlled waste.

C-cell hazardous waste is classified as level 3, out of a range up to 4. The waste material will generally be soil and timber contaminated with metal, all of which will be subject to independent testing and EPA approval prior to storage. Level 4 material will not be accepted at Copping, nor will radioactive waste, poisons, pesticides, liquids or faecal matter.

According to the *Waste and Resource Management Strategy*, 10 000 tonnes of controlled waste is exported interstate from Tasmania for storing and processing every year, primarily to Queensland. However there has not been a detailed audit of hazardous waste in Tasmania since 1991, so it is not

clear exactly how much hazardous waste may be stockpiled around the state. Southern Waste Solutions would welcome an audit, but believes the immediate need for a C-cell is well-established.

Continuing to ship waste to Queensland is not a sustainable ongoing solution. There are inherent risks involved in transporting, as well as putting more trucks onto Tasmania's and the nation's roads. Transporting is also more expensive and less efficient in the long run than effectively dealing with the waste locally. It also increases the carbon footprint of the activity.

The establishment of the Copping C-cell is not contingent on its use by either Nyrstar or the Macquarie Point Development Corporation. However, the establishment of an affordable local facility for controlled waste may well cause a change of behaviour for many local businesses, as well as giving the EPA an option for enforcing appropriate waste management practices.

Clearly, there is a need for governments throughout the world to implement policy that provides initiatives to reduce waste and to encourage the re-use and recycling of materials wherever possible. However, it is a safe assumption that there will continue to be some forms of hazardous waste that must be dealt with. For example, the increased use by some European countries of incinerators to generate energy from waste – while also producing carbon emissions – results in the production of ash contaminated with metals that must still be stored in secure landfill.

A recent policy paper by Zero Waste Europe, based on an analysis of landfill restrictions implemented throughout Europe, has found that a zero-waste-to-incineration policy is more effective at reducing overall waste levels than a zero-waste-to-landfill policy. In some cases, investment in incineration for energy production has had the perverse effect of discouraging waste reduction and recycling because of the need to burn predetermined tonnages of waste to offset investment costs.

Using a C-cell would form part of any world's-best practice waste management system, because using a C-cell is not just a matter of burying waste and forgetting about it. It is a secure way to track and store waste until it can be recovered and reused. As it is stored, the location of all material is mapped throughout the facility, so the metals can be extracted for reprocessing at a later date.

Meanwhile, the planned gate fee to use the Copping C-cell includes an amount that will be allocated to a trust, which is being established to look after the site in perpetuity. This trust will eventually reach a total of \$4 million to provide funding for ongoing monitoring and aftercare of the site following its capping and closure, and funds for remedial action in the unlikely event of future leakage. The scheduling of the fee is such that by the time the C-cell is just 15 per cent full, Southern Waste Solutions will have achieved its \$4 million target.

Southern Waste Solutions welcomes all questions regarding the Copping C-cell. We ask only that those who may oppose the development take the time to understand the facts, instead of resorting to emotive and misleading language such as 'toxic dump' or referring to the site as a 'local holiday spot' when it is in fact adjacent to an existing regional landfill.

Once again, you and your colleagues in the Greens are welcome to meet with Southern Waste Solutions for further discussions. Please do not hesitate to contact us to arrange a meeting.

Yours sincerely,

Christine Bell
Chief Executive Officer
Southern Waste Solutions