

7 February 2019

The Secretary  
NSW Department of Planning and Environment  
320 Pitt Street  
Sydney NSW 2000  
Attention: Ms Carolyn McNally  
Carolyn.McNally@planning.nsw.gov.au

Dear Ms McNally

Mr Marcus Ray and Ms Anthea Sargeant met with Mr Phil Carbins and myself at the end of 2018, for which we are very grateful. We are respectively the Chair and CEO of the Australian Landfill Owners Association (ALOA).

An agreed outcome of the meeting was this letter and an offer from the landfill industry to provide any assistance possible to the Department in relation to landfill planning and operations.

#### **About ALOA**

By way of background, ALOA was formed at a time when the Federal Government was developing the Carbon Pollution Reduction Scheme in order to provide the legislators with specific feedback and support relating to the production and capture of landfill gas. Negotiations with the Federal Government continued through the life of the Scheme and onto the current discussion relating to the Emissions Reduction Fund and the Baseline Mechanism. From a NSW perspective, ALOA represents the vast majority of the landfill industry including Suez, Veolia, Newcastle City Council, Wollongong City Council and Shellharbour Council.

#### **Current lack of capacity in Sydney metropolitan area**

Our primary concern is the current lack of capacity for the disposal of putrescible waste in the Sydney metropolitan area. With the recent closure of Eastern Creek Landfill, local Councils in Sydney (some 42 in number) with a responsibility for collection and disposal of putrescible waste are limited to two disposal options, namely Woodlawn Landfill and Lucas Heights Landfill. These are both excellent facilities but have limited opportunities to increase their annual tonnage intake, such that if one were to temporarily shut down (such as a bushfire in the vicinity of Lucas Heights or a railway malfunction on the line to Woodlawn) the other would not be able to receive additional inbound material. If this situation was to occur, putrescible waste produced in the Sydney metropolitan area would remain uncollected and therefore become a major threat to public health in a very short (less than a week) period of time.

Our concerns extend into the long term because of the extended timeframe required to gain planning approval for a new landfill. Any proposed landfill development would be unlikely to receive waste within ten years – experience has shown that the period of time taken from project conception to the first load of waste is typically ten years.

ALOA is keen to assist the NSW Government in its efforts to undertake long term planning for waste management facilities and specifically, future landfills. It should be noted that while alternative waste treatment facilities will find their place in the waste management market, these facilities produce a residual waste stream which will need to make its way to landfill.

**Lack of a defined precinct for waste management**

ALOA also wishes to note the lack of a defined precinct for waste management and/or obnoxious industries within NSW. Such a precinct, in a planning context, would provide transparency for a particular land use and facilitate appropriate buffer zones to prevent encroachment of contrary land uses. Whilst it is understood that there is significant difficulty in planning for such precincts, the Department may find an argument to develop such a precinct plan when considering the overall benefit to the health of the community.

Thank you once again for your consideration. We are available to meet for future discussions on these most important matters.

Yours sincerely



Colin Sweet  
CEO ALOA