



Advocating for the people of Western Sydney

SUBMISSION:

Response to the Western Sydney Airport Draft Environmental Impact Statement 2015

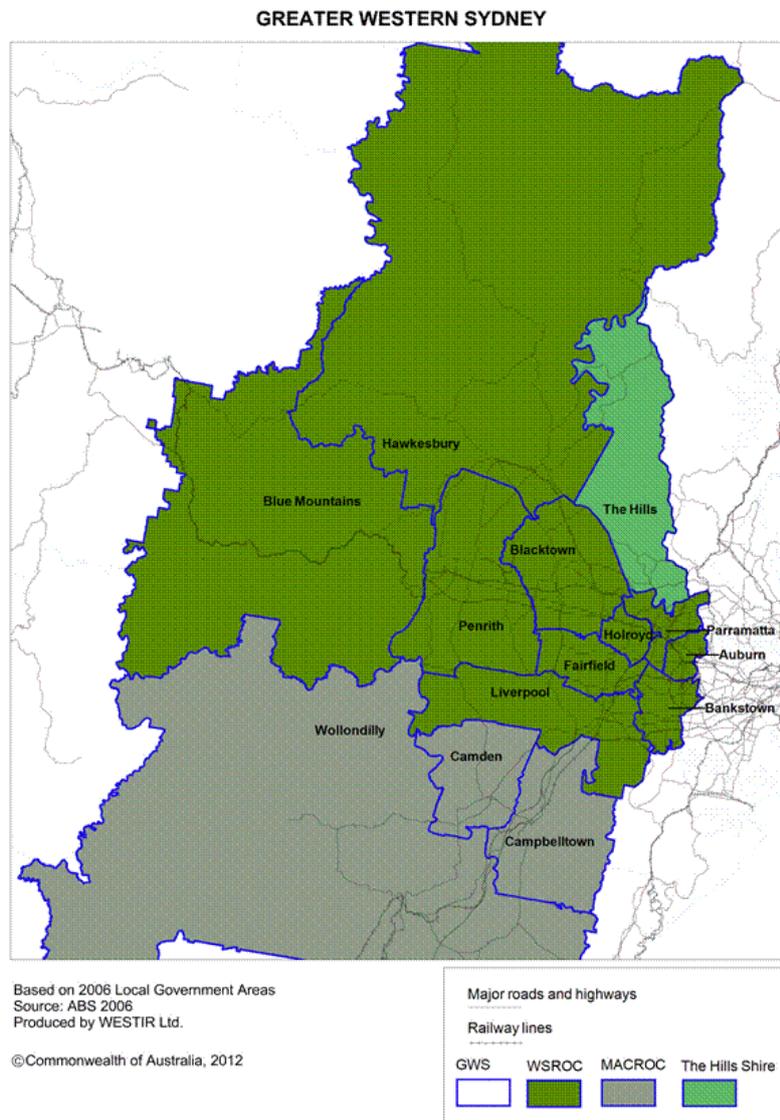
December 2015

Representing the councils of Western Sydney:



About Western Sydney Councils

The Western Sydney Regional Organisation of Councils (WSROC), representing ten councils in western Sydney, has reviewed the waste and resource recovery components of the Western Sydney Airport Draft Environmental Impact Statement. These councils are Auburn City Council, Blacktown City Council, Blue Mountains City Council, Fairfield City Council, Hawkesbury City Council, Holroyd City Council, Liverpool City Council, Parramatta City Council, Penrith City Council and The Hills Shire Council (WSROC).



About WSROC

Formed in 1973, the Western Sydney Regional Organisation of Councils (WSROC) represents 10 local councils in Western Sydney. WSROC provides a strong voice for the residents of western Sydney to improve quality of life. WSROC represents western Sydney councils covering a region of 5,500 sq. km with a highly diverse population and wide economic, social, environmental and geographical conditions.

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Over the past 40 years it has developed a strong history of fearless advocacy on behalf of the needs of its councils and residents, especially in the key areas of economic and social development, job creation, transport and infrastructure, planning, health and the environment, and has proven itself a reliable partner in intergovernmental relations, strategic planning, and coordinating joint projects, procurement and services.

WSROC works closely with various government agencies on a range of regional initiatives including the planning reform process, the development of a climate change resilience strategy and to deliver projects on the ground including regional waste programs, environmental education and carbon reduction initiatives.

Western Sydney Waste Avoidance and Resource Recovery Strategies

In 2014, the NSW Environment Protection Authority (EPA) funded WSROC to develop the *Western Sydney Regional Waste Avoidance and Resource Recovery Strategy* and to work towards fulfilling strategy projects. The strategy was developed to outline future directions for resource recovery practices across western Sydney, and explore options for addressing waste management challenges faced by councils in the region. The regional strategy focuses on increasing recycling, reducing waste to landfill and combatting illegal dumping and littering across western Sydney. As this region sits at the forefront of Sydney's future challenges and opportunities, these strategies ensure western Sydney's future direction maximises waste avoidance and resource recovery outcomes for the significant and growing population of the region.

By working together, councils are committed to improving regional cooperation and identifying opportunities to improving recycling and resource recovery practices across the region. As part of these the regional waste initiative, WSROC seeks to ensure that all waste and recycling issues detailed in the EIS consider potential for waste diversion and resource recovery, and there is no negative impact on the ability of councils to provide waste services to their community.

Western Sydney Airport Draft EIS Review

Introduction

The proposed airport represents a long-term waste generating source in the western Sydney area. Stage 1 of the proposed airport involves the initial construction and operation phases, with construction giving rise to the largest volume of waste in the short term. As leaders in waste management in the western Sydney area, western Sydney councils wish to ensure that there is an adequate consideration of the waste impacts that may arise from the proposed airport, in particular those that would have the potential to affect local government and its services.

Whilst it is acknowledged that solid waste from the proposed airport would comprise Construction and Demolition (C&D) and Commercial and Industrial (C&I) waste rather than domestic waste, there is some potential for both direct and indirect impact at a local government level. In general, councils are tasked with responsibility for the management of domestic waste rather than C&D and C&I waste, however issues such as illegal dumping, littering and landfill filling rates are also of strategic importance to councils. As such, the proposed airport has the potential to impact the overall western Sydney waste management framework.

This submission considers the assessment of the waste and resource impacts of the proposed airport in both Stage 1 Development (to 2030, including construction) and long-term development to 2063. This review has examined the sustainable management of solid waste and resources in the EIS, as well as the anticipated practical effects on the surrounding population and waste infrastructure. In

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particular, this focussed on how the construction and operation of the proposed airport will interact with the waste management environment around it – and on local governments' existing waste management and resource recovery systems.

Additionally, the overall objective of the Western Sydney Regional Waste Avoidance and Resource Recovery Strategy is for appropriate planning, avoidance and recycling of waste in accordance with the waste hierarchy. It is therefore important to western Sydney councils that the proposed airport planning process takes this into consideration.

Waste and Resource Recovery Components of the Draft EIS

The chapters of the Draft EIS that are pertinent to waste and resources management are:

- Chapter 5.6: Utilities (Stage 1 Development);
- Chapter 25: Resources and Waste (Stage 1 Development);
- Chapter 29: Conclusion (Stage 1 Development); and
- Chapter 39: Other Environmental Matters (Long Term Development). This chapter builds on the consideration of potential impacts associated with Stage 1 development. Further assessment and approval will be undertaken as detailed design of the long term development emerges.

There is no Technical Report devoted to Waste and Resource Management in the Draft EIS. Given the scale and importance of the Western Sydney Airport project, this is a significant oversight.

Draft EIS Strengths

It is pleasing to see there has been appropriate consideration of waste legislation and policy in the Draft EIS. There is also careful consideration of the waste hierarchy and recycling of recoverable waste is conceptually planned. The consideration of the waste hierarchy is crucial in ensuring the most efficient use of resources and reduction of waste. Commitment to investigate and develop a range of options to reuse, recycle, recover and treat waste generated by the long term airport development is strongly encouraged.

Compliance with the Waste Management Plan (WMP) would be required for airport tenants, contractors and suppliers, which is a positive step towards ensuring the airport is operated in a manner that diverts as much waste as practical from landfill.

Additionally, given hazardous waste will result from the development of the airport, including possible asbestos wastes, the planned management of this waste, consistent with the POEO (Waste) Regulation 2014 is necessary. The commitment to develop a detailed waste management strategy that relates to the long term development of the site is strongly welcomed.

Draft EIS Weaknesses

Low priority of waste and resource recovery in the Draft EIS

There is concern about the low level of importance placed on waste management in the overall EIS assessment process, given the significance of this construction project to the region, and the cost of waste recovery and waste disposal from this project.

High waste disposal costs are associated with the site due to significant landfill disposal fees, with our calculations indicating a cost of approximately \$50 million based on average industry C&D waste costs for the 200,000 tonnes of construction and demolition waste determined by the Draft EIS to be generated during airport construction.

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It appears waste management is not seen as a key environmental issue for long term development and is scantily considered in the strategic level assessment presented in the EIS. It also seems that the consultation process did not place any emphasis on waste and resource management issues.

Availability of waste processing and disposal

There is no assessment of the capacity of landfills and recycling facilities in the area to accept and dispose of construction and airport operational waste. Some streams of construction waste and operational waste are similar to streams of domestic waste, such as processed organics and co-mingled recycling streams. Many of the facilities listed in table 25-7 of EIS Volume 2 are used by councils for the recycling or disposal of domestic wastes. Inclusion of information on the availability of capacity at the listed facilities to manage airport wastes in the reviewed EIS would provide some certainty to councils that facilities will not be overwhelmed with waste and potentially unavailable to council in time. Similarly, as the capacity of landfill and recycling facilities is not fully considered, there is a threat that the long and short term waste needs of the development may not be met by the market.

Additionally, there is no specific assessment in the EIS of facilities to treat some wastes. As it is proposed that waste treatment would take place on site, there should be a proper assessment of, for example, the autoclaving and organic treatment. As the document stands, the information supplied is not sufficient for adequate assessment.

Litter and Illegal Dumping

Potential for and consequences of illegal dumping as a result of airport construction and eventual operation have not been considered. This region is particularly vulnerable to large scale illegal dumping, with much of the waste originating from all over Sydney. Illegally dumped waste can often include hazardous wastes such as asbestos, and currently costs the region many millions of dollars yearly to clean up. Liverpool City Council alone, in which Badgerys Creek is located, currently spends over \$1.5 million a year on illegal dumping. Despite councils' best efforts to tackle illegal dumping, including the work of the Western Sydney Regional Illegal Dumping Squad, the airport site itself suffers from recurrent illegal dumping and illegally dumped wastes will need to be cleared to construct the airport. There is also no detail about how the airport will seek to prevent the dumping of waste by contractors engaged during the construction of the airport.

There is also no consideration given to the generation of litter on and from the airport site. Given the significant number of jobs generated by this project, there is a high likelihood of litter on the site, particularly during construction. While there may be an assumption that litter generated within the airport site during operation is likely to be managed by cleaning staff, there will also be a significantly high likelihood of litter being windblown offsite, and people taking consumables offsite and littering. The National Litter Index shows industrial sites are the most littered sites in NSW, meaning the airport district is at risk of developing into a highly littered site.

Local councils spend significant cost and staff hours cleaning up litter. If there is no consideration given to litter generated and originating from the site, there is likely to be a significant impost on local councils, particularly Liverpool and Penrith City Councils, and councils along transport corridors to the airport. There should also be due consideration for the environmental impacts of litter, and the fire hazard from the littering of cigarette butts, one of the most commonly littered items.

Lack of detail

The components of the Draft EIS addressing waste and resource recovery are lacking the detail sought to understand the impacts of waste management for the airport construction and operation.

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There is little detail regarding the practical application of measures to promote waste avoidance, reuse, recycling or energy recovery according to the waste hierarchy.

No details have been provided regarding the assumptions behind waste generation forecasts. Such information would normally be expected in detail in a background technical report.

The treatment of organics, the second largest anticipated waste stream from the airport construction, and the most likely to impact local government services, is not discussed in detail. There is also a lack of detail of proposed bin systems within the airport, and there is little discussion of the risks associated with asbestos demolition waste and its removal from the site.

Additionally, detailed management and mitigation measures are not provided in the EIS. While it is recognised the preparation of a Waste Management Plan will occur before construction commences, this does not allow for assessment of adequacy of planned waste management and resource recovery. It is likely that Environmental Protection Licensing would be required (for the proposed transfer, recycling, storage and treatment of waste, including on site autoclave) but this is not considered in the EIS.

It has however been detailed that the level of operational solid waste recycling (Table 25.5 of the EIS) appears to be rather low compared to waste to landfill. The recycling of only 710 tonnes per annum compared to the expected 4,108 tonnes per annum disposed to landfill during airport operation at Stage 1 development sees a recycling rate of just 15%. This is far below the NSW Waste and Resource Recovery Strategy target of a recycling rate of 70% for commercial and industrial waste. There is no information in the Draft EIS detailing the levels of resource recovery sought in the construction phase of the airport.

It is also worth noting Chapter 5.6.15 lists expected generation of operational waste to be up to 11,210 tonnes per annum, which is inconsistent with operational waste shown as 5,251 tonnes per annum for Stage 1 operations throughout the EIS.

Related concerns

Cumulative environmental impacts over the long and short term may affect western Sydney councils. Though these are more loosely linked to the Draft EIS process, they are no less of significance:

- Impacts of the presence of the airport related traffic on waste truck routes from council collection areas to the numerous landfills and recycling facilities in the area;
- The effects on waste management of the many satellite businesses and residential areas that are expected to arise in Western Sydney as a result of the new airport; and
- Greenhouse Gas emissions from the airport waste.

Looking forward

The review of the Draft EIS indicates there are a number of issues that, if not considered and managed correctly, have the potential to impact on councils' waste management practices. Whilst a few positive potential outcomes and opportunities were identified, the overwhelming conclusion is that there is generally insufficient information in the Draft EIS for a full and considered assessment of the impacts of the proposed airport on waste and resources management.

For a project of this size, more robust and detailed assessment would be expected. Detailed consideration of waste management is particularly important as it is a complex industry, with high recycling rates hard to achieve without due strategic planning and implementation.

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The following issues which emerged from the review are of most concern to councils in western Sydney. These warrant inclusion in the final EIS:

- No consideration has been given to prevention or mitigation of littering and illegal dumping as a result of the proposed airport; and
- There is no concrete assessment of the capacity of landfills and recycling facilities in the area to accept and dispose of construction and ongoing airport waste. This requires further investigation and may have an impact on councils' usage of these facilities in the future.

Recommendations

- There is a need for greater detail to be provided prior to the issue of the final EIS. Of particular concern to councils is the need for further information of higher order actions in the waste hierarchy, including waste avoidance, reuse and resource recovery, the management of organic waste and the management of asbestos.
- It is strongly suggested that the airport should consider committing to best practice in line with NSW EPA recycling targets of 70% for Commercial and Industrial Waste and 80% for Construction and Demolition waste.
- Inclusion of information on the availability of capacity at the listed facilities to manage airport wastes in the final EIS could provide some certainty to councils that facilities will not be overwhelmed with waste leading to a reduction in markets available to councils for waste streams.
- A review of mitigation measures and management of litter and illegal dumping should be undertaken prior to the issue of the final EIS.
- Clarification is required on the expected generation of operational waste and rectified in references in the various volumes of the EIS.

Councils are keen to ensure that the Final Environmental Impact Statement has given due consideration to waste and resource recovery issues to the construction and operation of the airport, and ensure there any adverse effects on litter, illegal dumping or council's ability to provide waste and resource recovery services are minimised.

-Ends-

Technical components of the Draft EIS have been reviewed with the assistance of MRA Consulting. This submission has been prepared with their assistance.



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