



Our reference: EF13/ 3800 DOC17/86962-01
Contact: Mark Enright 02 6022 0603

The Team Leader
Industry Assessments
Planning and Environment
PO Box 39
SYDNEY NSW 2001

Attention: Bianca Thornton

Dear Ms Bakopanos

Re Visy Pulp and Paper Pty Ltd – section 75w Modification of Consent (MP 06_0159 Mod 3)

I refer to your electronic mail dated 30 January 2017 seeking a submission from the Environment Protection Authority (EPA) in relation to the proposed modification to the development consent for Visy Pulp and Paper Pty Ltd (Visy) Mill at Tumut (MP 06_0159 Mod 3).

The proposed modification is to permit an increase in production capacity from 700,000 tonnes per annum to 800,000 tonnes per annum.

The EPA has reviewed the Environmental Assessment (EA) report prepared by GHD dated January 2017 and as discussed with you on 10 February 2017 we make the following comments.

- Based on a review of the information presented in the EA, we consider the proposed increase in production will not cause a significant increase in air, water or noise emissions;
- The current Environment Protection Licence conditions are sufficient to regulate the proposed activity;
- We note there will be an increase in the volume of waste generated at the site for disposal should the modification be approved. We consider this to be an issue that the Department of Planning and Environment should seek further advice on. Similar issues were raised in our submission to the Department of Planning dated 5 March 2007 (Our reference DOC07/4108 - Your reference 9043050 copy attached) for Visy's Stage 2 expansion and we consider these issues to still be relevant.

This issue becomes even more important given the impending closure of the landfill at Burra Road Gundagai that has exclusively received up to 40 000 tonnes per annum of paper machine waste, grits, dregs and fly ash waste from Visy since August 2013. The operator is currently going through a closure process with the EPA as the landfill is expected to reach capacity during 2017.

We have detailed our issues and recommendations about the waste issue at Attachment A for your consideration.

If you have any further enquiries about this matter please contact Mark Enright by telephoning 02 6022 0603.

Yours sincerely

 14.2.2017

CRAIG BRETHERTON
Manager Regional Operations South West
Environment Protection Authority

Attachment A

Waste Management

The Environmental Assessment (EA) states the waste requiring off-site reuse or disposal is anticipated to increase from 71,245 tonnes per annum to 84,515 tonnes per annum based upon the requested increase in production capacity from 700 000 tonnes per annum (tpa) to 800 000 tpa.

The EA states –

“Approval of use of non-standard fuels in the multi-fuel boiler has not been obtained and Visy are investigating the implementation of numerous reuse or recycling options for the waste streams. Visy is also investigating potential resource recovery exemptions for dregs, grit and fly ash.”

The EPA can confirm for the Department of Planning and Environment that Visy have no current applications for resource recovery exemptions for using dregs, grit and fly ash from the Visy Tumut Mill. Carbon Mate Organic Recycling (Carbon Mate) at Wagga did have an exemption for the use of fly ash from the Visy Tumut Mill but this expired in August 2016.

To date, Carbon Mate has received 1 780 tonnes of Visy fly ash for land application as a constituent for a hardstand material under a resource recovery exemption. The EPA understands approximately 3,000 tonnes of fly ash are produced per year at the Visy Tumut Mill.

Carbon Mate has made application to the EPA for the same reuse proposal. The EPA is currently considering this application. Should the exemption be approved about 6,000 tonnes of Visy fly ash will be supplied to Carbon Mate over a two year period.

Other than a general statement in the EA that Visy will work with suppliers to reduce contamination in the waste paper bales and to investigate resource recovery opportunities, the proposed management of the increased volume of waste requiring off-site disposal is limited to the continuation of existing reuse and disposal practices.

The EPA has concerns about the lack of a strategic approach to the management of waste at this site together with the lack of clarity in the EA to the management of waste from the site.

It is worth noting that since 2013, 40 000 tonnes per annum of waste from the Visy Tumut Mill has been disposed of to the landfill at 303 Burra Road Gundagai. This landfill is expected to reach life time capacity shortly and is currently going through a closure process with the EPA. In 2016 an application by the operators of this landfill for a major expansion was rejected by the Southern Joint Region Planning Panel.

The EPA's concerns in relation to the limited information provided in the EA are as follows.

- The disposal of waste to landfill as detailed in the EA lacks a clear overall strategic and long term perspective;
- No specific details are provided on the five landfills Visy propose to use for the landfilling of their waste nor evidence of the arrangements between Visy and the landfills. As such the EPA is unable to determine if the landfills can lawfully accept and manage the waste types and quantities over the life of the project;
- In the absence of adequate details in regard to the landfill locations, the EPA also cannot assess if the disposal proposals will comply with the proximity principal in the *Protection of the Environment Operations (Waste) Regulation 2014* (the Waste Regulation);

We recommend that should the proposed increase in production capacity be approved the conditions of consent include the requirement for the development of both short term and long term waste management strategies.

These strategies should at a minimum include the following –

General

- How Visy intends to manage the waste in accordance with the waste hierarchy for the life of the Visy Tumut Mill project. The guiding principles of the waste hierarchy include waste avoidance, reuse and resource recovery, with the least preferable being waste disposal. Further advice on this can be found at <http://www.epa.nsw.gov.au/wastestrategy/waste-hierarchy.htm>.
- A detailed assessment of measures that can be implemented to reduce the level of contamination of the raw materials with comingled waste. The assessment should include clear objectives and targets with ongoing monitoring of performance.

Recycling and reuse

- A detailed investigation of reuse and recycling opportunities for the waste, including identifying any approvals that are required to undertake these activities;
- Commitments and timeframes for Visy to lodge applications for any approvals required for reuse of the waste;
- Timeframes for implementation of any approved reuse and recycling options;
- A commitment to report back to the Department of Planning and Environment once approval have been received and the reuse and recycling options have been implemented, including details of the volume of waste material to be captured by these activities.

Disposal to landfill

- Once the reuse and recycling options are implemented details of the volumes of waste to be disposed to landfill for the life of the project;
- An assessment of the capacity that exists for the ongoing disposal of waste generated from the facility including contingencies in the event that these disposal options reach capacity.