

OUT18/7900

Mr Shaun Williams
Industry Assessments
NSW Department of Planning and Environment

By email: shaun.williams@planning.nsw.gov.au

**Orange Waste Project Modification 2 (MP 09_0025 MOD 2)
Comment on the Environmental Assessment**

I refer to the email of 18 May 2018 to the Department of Industry in respect to the above matter. Comment has been sought from relevant branches of the Department of Primary Industries (DPI). Any further referrals to Department of Industry can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

The department has reviewed the report and provides the following comments for consideration in assessment of the proposal.

Impacts to apiculture

The apiary issues that are being reviewed as part of the modification raise the issue of future risk to the apiary industry from the waste management facilities.

The development of the Apiculture Risk Management Plan (ARMP) is noted, as required by Schedule 5, Condition 17 of the Project Approval. It is noted that the project operations have been assessed as posing a low/negligible risk to the apiculture industry. However, the risk assessment also contains an assumption that the risk environment is the same as that of the more rigorously monitored New Zealand operating environment. This presents a higher level of concern associated with some of the modifications to the conditions. The department considers protection of the apiary industry in NSW is paramount and provides the following comments for consideration:

1. The department has no objection to removal of the commitments related to exclusion of non-apiary related equipment and pesticide and chemical containers from disposal. The department notes that the bee keeping equipment information flyer is still to be provided as part of the operation conditions of the waste facilities, in order to deal with apiary related equipment, and the commitment regarding the operations and procedures of the Ophir Road Waste facility. Recently, Tocal College, DPI's Registered Training Organisation created an educational video of a Bee Biosecurity Officer outlining what beekeeping equipment is and why it should be isolated when found in tip waste. This was produced specifically for the Orange Waste Facility and should be used in the training package available for staff.
2. Whilst the ARMP has identified that an alternate bee food source is not required on the Euchareena Road site, the department does not support the removal of these commitments despite approval of the Conservation Management Plan in 2013. The department considers that this condition has the potential to deal with any risk to local apiary operations as part of the waste facility's situation, and previous concerns that arose

in the initial development assessment. The commitment to developing such a planting remains important, and can possibly be integrated into existing landscaping efforts.

3. The department has no objection to removal of commitments relating to baling and wrapping of putrescible waste.
4. The department considers that hive testing is still fundamental to monitoring for any risk to hives as a basis for dealing with any disease risk, and considers this commitment should be retained. This will deal with those factors that are conceded upon, such as that outlined above. Whilst no results are available, there is an opportunity to review and help determine a more appropriate monitoring program for the waste facility's operations risk.
5. As a result of the changes in the commitments and conditions that relate to apiary issues, the department considers a risk management monitoring and reporting process should still be committed to. This enables any potential risk to be identified and mitigated. This is requested as a result of the Euchareena site's location and operation, and the risk of such a facility to apiary interests. Considering the high level of concern at the initial development of the facility and subsequent conditions it is not considered to be useful to totally exclude any attention to apiary issues at this stage of the operation of the waste facilities at Euchareena Road.

To support the continued attention to apiary issues, the department welcomes further consultation particularly over the next few months while Dr Doug Somerville, Technical Specialist Honey Bees is available. Please contact Mary Kovac, Resource Management Officer on phone 6881 1250 or mobile 0427 949 987 for any general enquiries in relation to this response.

Biosecurity

The proponent should ensure they are familiar with the requirements of the *Biosecurity Act 2015*, in particular the general biosecurity duty under [part 3 of the act](#). The general biosecurity duty underpins the operation of the act and supports the principle of biosecurity as a shared responsibility.

Biosecurity risk assessment/s and a biosecurity risk management plan/s (such as plans to manage pest animals and weeds) are tools for biosecurity risks management. For information about biosecurity in NSW, please see www.dpi.nsw.gov.au/biosecurity.

Yours sincerely



Alex King
Director Cabinet and Legislation Services
15 June 2018