9 November 2012

Ms Christine Chapman
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Ms Chapman

Subject: **Awaba Landfill Expansion Project, Awaba (MP 10_0139) - Exhibition of Environmental Assessment**

Thank you for the opportunity to make a submission on the Awaba Landfill Expansion Project. Please find below comments from Council's Sustainability Department.

Greenhouse Gas Emissions Assessment

The greenhouse gas assessment has been undertaken in accordance with the *National Greenhouse Accounts (NGA) Factors* (DCCEE, 2010a) and *National Greenhouse and Energy Reporting System Measurement – Technical Guidelines for the Estimation of Greenhouse Gas Emissions by Facilities in Australia* (DCCEE, 2010b).

The proposed landfill extension has the potential to increase landfill gas harvesting and electricity generation on site through the expansion of existing gas extraction infrastructure. The intention of the project is to capture the majority of the greenhouse gases generated by the waste to landfill. Some 36% of the gas will be used to power a gas fired generator generating renewable energy (with 2% of this flared during generator downtimes). These measures are an important contributor to reducing the City's greenhouse gas emissions. It is acknowledged that the predicted increases in emissions will be offset by Council's proposed waste diversion programs for recyclables and green waste, which are not allowed for in the greenhouse gas assessment.

Data collected from the landfill gas monitoring program will be useful for tracking Council's greenhouse gas emissions, and reporting on carbon pollution obligations under the Commonwealth's Clean Energy Future program.

Air Quality Assessment

The air quality assessment has been undertaken using appropriate meteorological modelling and air pollutant dispersion modelling software, and has modelled the correct emissions for the industry and works.

There are no cumulative exceedances of Criteria Air Pollutants, and/ or Odour at any neighbouring sensitive receptors.

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The assessment does not provide calculations for emissions rates used in the modelling (just final figures and some selected calculation inputs) and therefore a verification of the emission rates was not possible.

Noise and Vibration Assessment

The noise assessment indicates no long term operational noise or vibration exceedances at sensitive receptors; however, there are some short term impacts for sensitive receptors during construction of the pipeline.

I support implementation of the proposed noise and vibration mitigation measures in the Construction Environmental Management Plan and/ or the Noise and Vibration Management Plan.

Biodiversity Assessment

Efforts have been made to site the expansion in the least ecological sensitive parts of the site and I understand that there are no other feasible short term alternatives available for waste disposal in the City.

The ecological studies for the project appear to have been undertaken adequate field surveys in accordance with the Lake Macquarie Flora and Fauna Guidelines.

The biobanking legislation will be used to offset the biodiversity impacts of the expansion of the Awaba Waste Management Facility. Council is in the process of establishing a biobank site on the nearby land and is actively negotiating the purchase of additional land to satisfy the required amount of ecosystem credits for the proposal. This approach is consistent with the Biobanking Assessment Methodology, and hence complies with Council's Biodiversity Planning Policy and Guidelines for LEP Rezoning Proposals.

In relation to the Council's draft Biodiversity Offsets Policy, the proposed offset areas are well in excess of those required by the draft calculator (a ratio of around 4.5:1 compared to the draft calculator requirement of 2.5:1). The main affected threatened species is *Tetratheca juncea*, with a loss of 2,302 clumps and 11,632 clumps available in the offset area, a ratio of 5:1 consistent with the draft calculator. Note that there is inconsistency in the report, which refers to 'plants' whereas these are more properly described as 'clumps'.

There is a potential deficiency is in relation to offsets for habitat trees with hollows, which does not appear to have been calculated, but it could be subject to a condition of approval to be resolved later.

While commitments have been made that a BioBanking Agreement will be finalised, no final offset proposal has been made, and the Office of Environment and Heritage has not agreed to the issue of the credits required. In the absence of a BioBank site with credits created and available for retirement, the commitments cannot be fulfilled. It is not known when and how this might proceed, but it could be subject to a condition of approval to be resolved later.

There is potential for inconsistency with offsetting requirements for species listed under the *Environment Protection and Biodiversity Conservation Act 1999*. This will need to be

resolved once Commonwealth approval has been given, and could be subject to a condition of approval to be resolved later

Progressive rehabilitation and revegetation of the landfill area is supported. As indicated in the Statement of Commitments, this should be undertaken in accordance with a detailed Vegetation Management Plan. This plan should address prevention of litter and weed invasion into the adjacent biobank site. The development of protocols prior to clearing the site is also supported. Both the Vegetation and Fauna Management Plan should deal with the management of edge effects along the interface of the biobank and landfill site. The Fauna Management Plan should also deal with the management of pest species and may include the use of hollows and spouts to augment habitat in other areas.

There are a number of management plans referred to in the Environmental Assessment including a BioBank Site Management Plan, a Vegetation Management Plan, and a Fauna Management Plan. It would be preferable to have one management plan covering all of these issues to avoid potential inconsistency and conflict between these plans, which also need to take into account any BioBank site management guidelines.

Should you require further information, please contact me on 02 4921 0337.

Yours faithfully

Dr Alice Howe
Manager Sustainability