www.southhobart.org
secretary@southhobart.org
ARBN: IA10232

11 January 2016

Nick Heath
General Manager
Hobart City Council

Representation relating to the permit application - McRobies

Dear Mr Heath,

I am writing on behalf of the South Hobart Sustainable Community, an organisation formed in 2007 that has led a number of community projects. Since August we have been speaking with South Hobart residents and business owners, and seeking their feedback (via a well-attended public forum, email, newsletters, social media, etc.) about the plan to extend the life of the McRobies Gully landfill by 23 years to 2030. The South Hobart community has hosted landfill sites (and the associated contamination, traffic, smells, etc.) for Greater Hobart for over fifty years.

We would like the City of Hobart and the EPA Board to consider the following points in relation to Council's application for environmental approval to increase the final fill height of the McRobies Gully Landfill in South Hobart, from the currently permitted maximum fill level of 184 metres above sea level (AHD) to 200 metres AHD, and the resultant increase in capacity of approximately half a million tonnes of waste (plus 'cleanfill').

1) Despite the great work the City has done to improve waste management and their long-term vision for zero waste, we believe that the City of Hobart, as one of the big-six Tasmanian landfills, should not get environmental approval to increase the life of the McRobies landfill site until burying materials in landfills across Tasmania has been accurately priced (through higher gate fees and a State-wide waste levy) to encourage diversion.

2) Large quantities of food and green waste (26%), cardboard and paper (10%), building material (21%), recyclable plastics (9%) and other recyclable materials are currently being buried in Tasmanian landfills (figures based on the NTWM Landfill audit 2011, the Waste Advisory committee have more accurate State-wide figures). These materials could easily be diverted, rather than create unnecessary long-term pollution to land, air and water.

3) A number of Councils collect or will collect green waste and plan to collect food waste in the future. This is not an adequate solution as there is uncertainty as to when they will be able to implement food waste collection. Both food and green waste need to be diverted as soon as possible. The State Government will need to plan for increased commercial composting capacity.

4) The environmental impacts of a landfill site go beyond pollution to land, air and water in the immediate area. They are also present in the resources wasted and lost opportunity. Approximately 426,000 tonnes of materials has been buried in Tasmanian landfills each year since 2007, the majority has been compostable, reusable or recyclable (source: EPA Annual Report 2013/14, WAC Tasmanian Waste Review 2014).

5) Based on the mainland trend of a $133/tonne landfill levy, a Tasmanian waste levy should be introduced incrementally to a comparable amount over the coming five years, this will provide time for recycling businesses to establish. The effect of accurately pricing landfill, as has been done in NSW and other States, has been to drive waste costs for most companies from 1% of operating costs towards 2-3% (The State of Waste 2015, MRA Consulting). This may be perceived as a business impost or an opportunity. We see it as the latter. Accurately reflecting the true costs of landfilling materials creates the headroom for recyclers to operate competitively and so leads to many new business opportunities. It also removes the onus from rate-paying households who effectively subsidise big commercial waste generators like clubs and pubs, retailers and building companies, as well as all past users. A token $20 levy is not an option, effective waste diversion relies on strong cues.

6) Contrary to the mainland States, reporting on quantities of construction and demolition waste materials such as concrete rubble, road pavement, glass, bricks, etc. is currently not required under the Tasmanian Waste Classification System (source: EPA Annual Report 2013/14). We believe that these materials need to be reported and must be included in the State-wide waste levy, so that they can be better managed. They currently do not attract a gate fee but represent significant amounts of embodied energy and should be directed to reuse schemes.

7) Currently approximately 40% of the weight received at Derwent Park Materials Recycling Facilities is glass. 75% of used glass packaging ends up in various landfills around the State (only 25% is used in bricks and as road base, and none is made back into glass). The low and misleading reported kerbside recycling bin contamination rates (e.g. 7% in Southern Tasmania) need to be corrected to more accurately reflect the true outcome of the communities misguided recycling efforts (and associated costs).

8) As per the objectives of the Resource Management and Planning System of Tasmania, we believe that it is important "to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State". As evidenced by the large quantities of compostable and recyclable resources being buried throughout Tasmania, the community and industry spheres need the assistance of the

www.southhobart.org
secretary@southhobart.org
ARBN: IA10232

Government sphere (through a waste levy) to more responsibly manage waste.

9) As per the Environmental Management and Pollution Control System, We believe that it is important to achieve the following objectives from that System (Schedule 1 Part 2):

(b) to prevent environmental degradation and adverse risks to human and ecosystem health by promoting pollution prevention, clean production technology, reuse and recycling of materials and waste minimization programmes; and

(d) to allocate the costs of environmental protection and restoration equitably and in a manner that encourages responsible use of, and reduces harm to, the environment, with polluters bearing the appropriate share of the costs that arise from their activities; and

(e) to require persons engaging in polluting activities to make progressive environmental improvements, including reductions of pollution at source, as such improvements become practicable through technological and economic development; and

(g) to control the generation, storage, collection, transportation, treatment and disposal of waste with a view to reducing, minimizing and, where practicable, eliminating harm to the environment; and

(k) to co-ordinate all activities as are necessary to protect, restore or improve the Tasmanian environment.

Thank you for the opportunity to make these comments.

Yours sincerely

Ben Clark
President