

31 July 2018

The Proper Officer
Resource Recovery Taskforce
Environmental Protection Agency
200 Victoria Street
CARLTON VIC 3053

By email: taskforce@epa.vic.gov.au
cc: contact@epa.vic.gov.au

RE: MANAGEMENT AND STORAGE OF COMBUSTIBLE RECYCLABLE AND WASTE MATERIALS GUIDELINE

Dear Sir/Madam,

Thank you for giving us the opportunity to provide industry feedback to the proposed *Management & Storage of Combustible Recyclable and Waste Materials guideline (Guideline)* document.

At Bingo, we pride ourselves on being committed to a process of continual improvement in our activities which acknowledges our overall responsibilities to the community. We continuously ensure that our operations further promote the health and wellbeing of our local communities and protect our environment.

Accordingly, we acknowledge the importance and guidance the Department of Environment, Land, Water and Planning (*DELWP*) along with the Environment Protection Authority (*EPA*) can provide in assisting the industry to align their practices to protect the environment and human health from the risk of fire.

The subject guideline aimed at managing stored combustible recyclable and waste materials should contain practical guidance aimed at striking a fair balance between the overall policy objectives and the potential barriers arising in implementing such guidelines within the operational scheme applied on site and the ability to replicate such guidelines on various sites.

Careful considerations of the interplay between the various obligations under other statutory schemes and the proposed guidelines, should be borne in mind.

The guidance consider any unfair restrictions to operations as a result of these guidelines and the wide variety of sites and businesses undertaking work in this industry.

We hereby make our recommendations to the proposed guidelines and adopt the numbering contained in the document for ease of reference:

- 3.1. Business require robust safe working practices, and we agree with the majority of the suggestions made in the section. Nevertheless, it may not always be practical to ensure separate / designated areas exist for material drop off, storage and processing. For safety reasons, consideration, must always be given to traffic management operations aimed at minimising the amount of plant & pedestrian movements to ensure everyone's safety on site.
- 4. Risk assessments should form the foundation of all site operations. Risk assessments should be able to be completed in the form of site specific risk register reviewable every 12 months or in the event of a change in operations, whichever is earlier. Centralising risk assessments into a tailored risk register ensures that it is being actively used and referred to by personnel .

- 5.1. Occupiers have the responsibility for providing infrastructure for fire suppression, however this should be in line with the relevant Australian Standards, applicable at the time. Fire detection devices often fail in dusty environments which is counterproductive for the purpose of this Guideline. Furthermore, the certification and maintenance of sprinkler systems can prove cost prohibitive for small operating businesses, where in some instances may be mitigated by more appropriate and cheaper site specific equipment . This section may benefit from including a customised provision encouraging business to firstly assess the infrastructural requirements of their site and secondly, address these requirements with the appropriate equipment (fire hoses, extinguishers etc.) to manage the fire risk on site.
- 5.2. The guideline should clearly distinguish between what is a requirement and a recommendation. We suggest that this be a recommendation of 2 x 250,000 L tanks as it may not be suitable dependant on the size of the site/operation
- 5.4. Onsite equipment may be used to suppress/separate smouldering material if safe to do so, however the safety of personnel on site should prevail . In some instances, it may not practical to retrofit existing equipment in all circumstances. Personnel who are not trained fire fighters should not be putting themselves in positions that require the use of a certified BA.
- 5.6. The fire response section in the emergency management plan (EMP) should be focused on the safety of the personnel in the area, as overly detailed and verbose EMP's with too many sections may restrict the effectiveness of the document during emergency situations. Points in this section should be recommendations rather than requirements. For example, an analysis of water pressure may not be useful in an emergency response document and should be a consideration during site planning stage or the risk register.
- 7. More consideration is required around the type of CRWM being stored with different stockpile restrictions based on the material type/composition. For example dry mulched green waste is a much higher fire risk than a mixed C&D waste (concrete, plastic, soil and timber) pile or a steel pile. Daily stockpile inventories are not practical or realistic, maximum stockpile sizes are already regulated through the DA / planning permit administered by Council. Inventory recommendations are generally recorded via weighbridges in the industry, however material accepted will usually be mixed into stockpiles for processing and is unable to be kept separate.
- 7.2.1.a. Stockpile dimensions should be different for different waste types dependant on the risk assessment completed. Stockpile heights are already regulated via the planning permit / DA.
- 7.2.1.b. Stockpile separation distances should be different for different waste types dependant on the risk assessment completed. Not all stockpiles are square in shape, separation distances are not practical for all metro sites that may be long and narrow in nature. Consideration must be given to other controls already in place. Other safety and environmental risks (traffic management, dust, windblown litter etc.) may result in stockpile separation creating greater risks to the environment and/or human health.
- 7.2.1.d. Stockpiles are often located in close proximity to buildings as the building houses processing equipment (MRF's etc.). It also reduces the amount of onsite traffic required to process material. Relocating material stockpiles further from processing buildings will increase the traffic management risks, windblown dust, litter and pedestrian safety on sites. Separation distances should be mandated by the material type, planning permit, DA & site specific risk assessment. Safe separation distances to buildings, stockpiles and boundary fences will vary greatly from site to site and greater consideration for the differing material types, controls and processes in place is required before implementing broad stockpiling restrictions.

Should you wish to discuss any of the above points in further, please do not hesitate to contact us.

We thank you for the initiative taken by the taskforce and hope that our above recommendations would be conducive to the practical implementation of guidelines where all stakeholders may be able to identify with.

Yours faithfully,

Ben Morgan

Safety, Environment & Quality Manager - Victoria