

Key Issues Summary

for Submissions received in response to Great Southern Waste Technologies Pty Ltd Works Approval Application

A) Environmental concerns (water, land, waste)

A1. Concerns re Water or land contamination and environment

1. Concerns about water quality impacts and risks
2. Concern that medium risks to air, soil, water and land contamination are “Accepted” in the risk assessment
3. Concerns about release of toxic chemicals to water (Dandenong Creek) and soil causing irreversible harm to all living beings
4. Concern about risk of Ground / Aquifer Contamination, including introduction of dioxins, “one of the most dangerous pollutants known to mankind”.
5. Concern that the risk of Aquifer contamination via in-vessel incineration has not been considered in the risk assessment
6. Concern about long term contamination of local ground water and rivers flowing into the eastern treatment plant and the potential contamination of recycled water supplies to residents of Keysborough, Somerfield and surrounding areas, or flows into the bay.
7. Concern about the risk to native wildlife in local and wider areas - including migratory birds like the sharp-tailed sandpiper, the red-necked stint fly, Latham's Snipe and the black-winged stilt as well as many native species like the superb fairy-wren, magpie-lark, red wattlebird, white-plumed honeyeater the black swan, pacific black duck, the blue-billed duck, and the grey and chestnut teal.
8. Concern that the 160 metre distance to Dandenong Creek may not be enough to prevent pollution from the proposed facility, vehicle movements, or windblown rubbish.

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**

A2. Concerns re Waste disposal, litter

1. Concern about rubbish falling off trucks/vehicles and being blown by the wind in many different directions.
2. Concern about the disposal of ashes in landfill and environmental impact from heavy metals caused by this.
3. Concern that the waste will be dumped in the open and that this will accumulate biological and chemical hazards.
4. Support for great initiatives of reducing the waste and changing the way these are disposed of and made use of, but concern that the proposal will create pollution and emissions.
5. Concern that there will be toxic waste leftover.

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**



Environment
Protection
Authority Victoria



B) Air quality, dust, odour, noise

1. Concern that air quality has deteriorated over the last 10 years
2. Concern of increased air quality impacts by adding to existing emissions from nearby landfill and industrial facilities
3. Concern about the safeguards in place to capture and reduce hazardous gas emissions
4. Concern about air quality impacts on families and their neighbours.
5. Concern about toxic air quality causing irreversible harm to all living beings.
6. Concern about effects on the environment from possible air pollution
7. Concern that air quality will become so bad it will not be suitable for residents to live there anymore
8. Concern that the City of Dandenong Council and the EPA are not resourced enough to detect, prove or clean up pollution.
9. Concern about the risk to human health and local farming and chicken and egg production from potential air pollution, including dioxins
10. Concern about whether the proposal is environment-friendly, given it burns materials including plastics, and produces chemical emissions
11. Concern that the Risk Assessment has a risk management strategy to 'Accept' the 'Medium' risks from air quality. Concern that the residual risks are not acceptable.
12. Concern about the effectiveness of pollution control technologies in removing pollutants, including those which are persistent and bioaccumulative; which resist breakdown in the environment and are concentrated in the food chain.
13. Existing odour impacts that residents are complaining about, including chemical smells
14. Odour will be worse than existing levels because of the proposed facility
15. Odour from the stench of waste
16. Children vomiting from existing odour impacts
17. Responses to odour complaints from Council
18. Existing odour impacts force children to stay inside
19. Concern that the second and third most common winds from SSE and SE winds will frequently blow odour and emissions to the residential area and schools
20. Existing odour, which is 'absolutely disgusting'

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**

21. Existing odour prevents the opening of windows to have fresh air, to go running, to comfortably breathe.
22. Concern about increased noise from increases in truck traffic in the morning and afternoon of each day.
23. Concern about increased noise impacts on people in their homes in nearby areas.
24. Concern that noise will devalue the property owned by residents and that no one will want to come and live here.
25. Concern that neighbours are worried about the future air quality and noise levels.
26. That the noise levels are not acceptable for the local residents.

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**



Environment
Protection
Authority Victoria



C) Human health concerns

1. Close to residential areas and schools. Potential human health effects from emissions of combustion gases, dust, odour. Suggestion that the technology should be built and trialled long-term in country areas without residents and schools, to ensure it's safe for the public and environment.
2. Concern about the ability to compare health impacts between Melbourne and Norway due to differences in allergy triggers from air emissions
3. Concern about impacts on young people and children
4. Concern about the health of the high number of young families and children at home and at school
5. Concern about health impacts of dioxins and furans emissions to air and land.
6. Concern that the pollution will badly damage people's health.
7. Concern that my kids' health is in danger.
8. Concern that kids, adults and elderly people will get sick from toxic gas.
9. Concern that there could be a plant malfunction, toxic gas could escape and potentially kill people nearby, without enough warning for people to evacuate.
10. Concern that control measures are unlikely to mitigate all the risks and that health effects are significant
11. it would affect the environment we are raising our vulnerable children, by products of the energy plant may affect our children's health.
12. Concern about developing any diseases, asthma or cancers from nearby residents
13. Concern about whether the health of children was considered in the proposal.
14. Concern about being able to live healthily if the air quality worsens because of the facility
15. Concern about the health impact on human development and young people, as well as older people
16. Concern that people will be unable to avoid the air quality impacts
17. Concern about new school opening and increasing numbers of young people moving to the area that will be impacted

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**

D) Concerns about the location of facility and road/traffic impacts

D1. Concerns re location or separation distance

1. Concern it is so close to a densely populated residential area.
2. Concern that nearby areas have been marked for high density development with more residential buildings (houses, townhouses and apartments) being built along with childcares and schools
3. Concern it is close to new built community, mainly young families.
4. Concern that the nearby is large and growing quickly - more than 7000 families in Keysborough in 2016. Somerfield also growing.
5. Concern that all the childcare, primary schools and colleges are so close, all within 5km.
6. Concern that the location for this facility is only 1.4 km from the closest local residents and school (Mt . Hira college) and there are 2 primary schools, 2 colleges, 3 kindergartens and 1 maternal and child health centre are within 5 km radius from this location, over 280 local residents have signed a petition to stop this happening.
7. Concern that people had no idea about the proposal before making the decision to move to the area.
8. Concern that the technology will have health impacts from air emissions and that the technology should be trialled to demonstrate safety in a country area with no residents
9. Suggestion to move this plan to a remote area with less people living there.
10. Concern about inter-generational equity
11. Concern about proximity to the existing South East Green Wedge (and area specifically designated for agricultural activity)
12. Concern that the potential impact to residential community health will be outweighed by any energy generated in the future.
13. Concern the location is too close to homes and people, but support for the need for the technology or facility in another location
14. Concern that local residents are being ignored in their concerns about how close the plant is
15. Concern about the VCAT planning decision and whether EPA decision affects
16. Concern that residential planning and development activities showed no sign of a WTE plant being planned nearby

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**

D2. Concerns re road/traffic impacts

1. Concern about traffic impacts in school hours at Greens Rd and Chapel Rd, with new townhouses being built, a new school and increased truck traffic.
2. Concern about a significantly increased risk of traffic accidents, noise and odour.
3. Concern about leaks, spills, or fire from trucking of waste and the hazard to children at nearby school.
4. Concern about traffic noise.
5. Concerns about traffic congestion getting worse than it is now.

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**



Environment
Protection
Authority Victoria



E) Other concerns

E1. Concerns re Climate Change and Greenhouse gases

1. Concern that by “destroying resources rather than conserving them” there will be significant and unnecessary lifecycle Greenhouse gas emissions.
2. Concern about global warming and pollution and whether producing energy by creating and releasing harmful and deadly contaminants is really the way to go?
3. Concern that the argument that gasification can reuse carbon emissions fails to mention the creation of additional greenhouse gases.
4. Concern that Australia’s climate has changed dramatically, that recent bushfires seriously affected air quality in Dandenong and Keysborough areas and that the fire risk of waste storage in proposed plant location will increase the risk to public.

E2. Concerns re Impact on society and economy

1. Concern about destruction of economic development opportunities in the surrounding areas
2. Concern that residents will move out and shops and schools will close
3. Concern that the surrounding area will be less attractive to the public to live and study
4. Concern that impacts may force owner occupier residents to move out
5. Concern that the local crime rate will increase and the local business market will decrease
6. Concern that council investments on the local community hub, parks, playgrounds, and libraries will go waste if the proposal goes ahead and people leave because of the impacts.
7. Concern that the Council and the EPA are not resourced enough to detect pollution or enforce compliance.
8. Concern about air quality impacts on local farming, including chicken and egg production

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**

E3. Concerns re Property devaluation

1. Concern that the proposal will impact house prices.
2. Concern about not being able to afford to move away.
3. Concern about people who are disadvantaged and need to stay.
4. Concern about the “possibility of our homes being ruined”.
5. Concern that property will be devalued due to traffic, noise pollution, health hazards and because no one will want to come live here.
6. Concern that the proposal wasn’t communicated before buying our property

E4. Concerns re Technology and regulation

1. Concern that the imported technology is experimental and that the risk is unknown and uncertain.
2. Concern that the size of the proposed facility is larger than European facilities
3. Concern that there are no clear guidelines and assessment regulations for the gasification waste to energy technology in Australia.
4. Concern that the proposal cannot be protective of health and environment in the location due to the current regulations in Australia.
5. Concern that waste to energy [WTE] is not a one and all solution for waste management
6. Concern that WTE does not solve the waste management crisis
7. Concern that WTE will mean that improvements in recycling to minimise municipal solid waste [MSW] will be impacted
8. Concern about whether the trade-off of reducing one type of landfill waste for another, and pumping toxic, persistent and bio-accumulative poisons into the air, ground and (potentially) water supplies, is worth it.
9. Concern about how the resulting ashes will be treated, transported, stored and disposed
10. Concern that the waste audit results were hidden as 'commercial-in-confidence' and not available
11. Concern that the proposal needs to explore the reasons for opposition to similar overseas projects by residents
12. Concern that the application is at odds with the Council aim to "promote a healthy, active and safe community..."

THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE

13. Concern that the Council cannot choose to promote health and at the same time allow the risk of pollution.
14. Concern that the management of GSWT by the EPA or Council to "meet best practice and mitigate impacts" (as per MWRRG [Metropolitan Waste Resource Recovery Group] Hub Plan Action point 5) is subjective and will in time become open to negotiation
15. Concern that compliance to the Stockholm conventions, which requires rigorous controls, has been proven to be entirely inadequate at a local government and global level for this type of industry in the past - especially for airborne or groundwater based pollution coming from private facilities.
16. Concern that lessons from mistakes in countries with an established WTE industry need to be considered
17. Concern that at least a 10 km buffer zone from cities and residential areas is needed to prevent health impacts caused by exposure to toxic flue emissions that contain furan, dioxin, and other heavy metals
18. Concern that the technology will have health impacts from air emissions and that the technology should be first trialled to demonstrate safety in a country area with no residents

E5. Concerns re Other issues

1. Concern about the short notice (October 2019) of the proposal.
2. Concern that people had no idea about the proposal before making the decision to move to the area.
3. Concern about the safety of the proposal and the risks of dangerous accidents, fires or explosions

**THESE ARE A LIST OF ISSUES RAISED IN THE SUBMISSIONS
EPA NEITHER AGREES NOR DISAGREES WITH
THE ITEMS LISTED ABOVE**