



Short-form Feedback

1. I believe we should adopt the technology used by Sweden which helps generate energy from rubbish.

State should help setup these kind of facilities which will be helpful in the long term.

Postcode – 3029

2. Rather than hassling recycling companies regarding how they store their recyclables, it would be better if the government provided funding to assist them and also bought (and mandated the buying of) the products made from the recovered waste, such as bollards, playground equipment, railway sleepers and seats. This would close the loop by ensuring there are markets for those recycled products. Combined with this should be a much greater focus (including strengthened legislation) on producer take-back responsibility. Eg, all producers and suppliers of white goods, computers and peripherals, cars and other large products should be obliged to take them back and recycle them at end of life. Finally, Victoria needs to follow the other states and establish a robust and easy to use container deposit scheme.

Postcode – 3000

3. There is no annual EPA auditing or monitoring process (paid by the facilities) in place to ensure the 886 sites follow the policy or guidelines. Another accident waiting to happen!

I am a concerned resident and country property owner and there is no mention of an annual EPA auditing or monitoring process (paid by the facilities) in place to ensure the 886 sites follow the policy or guidelines. Are there any? If not this is just another accident waiting to happen!

Postcode – 3122

4. There does not seem to be any mention of large recycling companies that stockpile materials (eg plastics, tyres)

I am NOT a business owner. I AM a concerned citizen and from experience in an unrelated field I am concerned that for a number of years the fire risk mitigation is expected to be undertaken entirely by the owners of the relevant businesses, who obviously have strong financial incentives against acting and no obvious incentives outlined here to act. I understand EPA changes are in the pipeline and they will have an as yet unspecified regulatory role to play. I am concerned however that nowhere in the act or guideline are penalties outlined. Fire risk inspections should be carried out externally. At least then you know they are done by someone who knows what they're doing and what changes are needed - these can be ordered, a time frame given and special equipment etc needed also put in the report. I see this as being similar to a visit by the drugs unit to a vet hospital (where I work) - also in the interests of public health (oh by the way also massively under-resourced!) I worked at an animal shelter on Black Saturday and was locuming (I didn't regularly work there) when the CFA came and told us to evacuate I was the only person there who knew where the evacuation point was. Because I had read the fire plan on the wall. Nobody in management did, and they were in charge of numerous volunteers. This is how "in-house" (ie voluntary) guidelines/plans work. Nobody bothers to follow them up or do any drills etc. Then when you need to enact the fire plan it is too late. This is my concern with many of these operators,

same as any other business manager/owner. It needs enforcement of some kind. Like drugs legislation in vet clinics urgently needs more of!

Postcode – 3677

5. Very good project lets hope it gets built.

Postcode – 3001

6. As a manager of small transfer stations and a small rural landfill, I have the following comments regarding the CRWM policy and supporting guideline document.
 - The Policy appears to be a response targeted to issues that specifically occurred in large scale, private facilities of a particular type. The response however is far reaching and impacts on facilities of all sizes and scopes.
 - The Policy and the supporting guideline document need to be strictly risk based so as to allow financially, socially and environmentally responsible planning and implementation to occur. For example the strictly stipulated requirement for 500,000L of water storage for fire fighting is entirely unfeasible in some situations (small transfer stations or even waste disposal bins located in remote areas).
 - While it is acknowledged that the Department would be judicious in its application of the policy and guidelines, the black and white nature of the policy is already being utilised by waste facility management contractors to push additional liabilities back onto facility owners so as to minimise liability where a requirement may not be in place.
 - Evaluation of risks, plans and responses needs to be advised by a third party expert. CFA and MFB have occasionally been problematic by not committing to provide advice (to avoid liability) have been exceedingly conservative (so as to minimise risks to the agency) at the cost of the party being assisted and in some extremely remote cases social issues in small rural towns have impacted on the advice provided.
 - The potential infrastructure costs associated with meeting the requirements of the Guideline are in some cases astronomical especially in regards to the quantities of various products received by rural and regional transfer stations. As the same infrastructure is nominally required between different facilities, a recycling end processor may have to install stockpile separation walls for the handling of thousand of tonnes of material with a small rural transfer station having the same liability for what amounts to kg of the same material.
 - The definition of stockpiles needs to include a scaling system while a stockpile of 1000 car batteries and a stockpile of 10 car batteries are both stockpiles due to being in storage, there is a significantly different risk profile. This difference is not reflected at all currently in the policy or guideline.
 - A toolbox or checklist for establishing risk and appropriate risk mitigation risks based on a risk based scale would be extremely useful for establishing the scale of risk between sites and maintain a level of consistency in evaluating what is required to mitigate risks. An evaluation undertaken by the facility manager could be undertaken with a confirmation/signoff by a third party, independent evaluator.

Postcode – 3995

7. The Guidelines are too Black and White and basic require further development. A guideline is not an obligation.

As mentioned below, you have not considered the size of sites/whether they are in rural/regional or metro areas, the range of choice of sites is limited, long-standing sites, planning scheme issues. Fire prevention - many rural sites do not have utility access -

power/water. Storage most products are collected monthly but due to constraints of transport, limited choice of collection companies, volumes, accessibility etc, financials, milk runs etc can only be achieved yearly.

There is no consideration to long-standing rural/regional small unlicensed sites. Nor any reference to site selection applicable to Council Planning Schemes, nor the work conducted around this by other agencies, ie WMGroups. As for site storage, minimal resources - staffing do not allow for protracted data recording. The storage section also does not accommodate that some sites are surface area bigger than others which makes for difficulty in meeting desired space between stockpiles. The storage and size of stockpiles needs to be reconsidered as the shifting of many of these materials does not occur weekly, monthly for all products but sometimes yearly, due to financial constraints, transport constraints - distance, milk-run situations where volumes for collectors, need to be a certain volume before they will conduct a collection and also therefore requiring additional materials from other sites/Councils/facilities.

The physical staffing resources would be great thanks! Checklists, posters,

Yet again, State Government have issued a draft then final document prior to conducting stakeholder engagement; a ridiculous waste of financials and resources.

ARCC

8. My only concern is the fire protection systems being considered do not provide the most earliest form of detection.

Stockpiles/stacks can obstruct the speed at which elements of fire (heat, smoke and light) can be identified by active and passive fire systems

Although a lot of the recommendations are correctly based on the BCA etc, these systems (passive and active) are designed by nature to protect structures not to give the most earliest possible detection to assist the mitigation of environmental risks posed by stockpile fires in metropolitan areas

CCTV monitoring technology is available and widely used through-out the world in warehouses and external applications such as stockpiling and forestry. This provides constant monitoring and immediate warning of issues, although as far as I am aware is not recognised within the framework of essential services (so it will not be raised as a possible solution)

Benalla Rural City Council

9. Some of the obligations are not achievable for smaller sites - requirements need to be relevant to size of site, volume of waste and risk based

Golden Plains Shire Council

10. Councils comments have focused on the guidelines. Councils are of the view that the guidelines have been designed for high risk facilities and that to expect small sites to comply with this is not appropriate. The main feedback is that the guidelines need to be scalable and risk based.

Councils raised concerns about the practicality of the fire mitigation and storage requirements for small rural sites such as transfer stations. For small sites that have a low volume of materials, customers and opening hours the requirements for water supplies, emergency equipment/ infrastructure and separation distances between stockpiles are not practical. One council provided an example of one of their transfer stations that is only open one day a week for 5 hours and on average receives 10 customers on that day. The site is surrounded by farmland, has no power or town water, therefore firefighting requirements and infrastructure

would be difficult to achieve. The storage requirements are also not practical for small sites as often there is not enough physical space onsite or some materials have to have larger stockpiles before a processor will come.

Another councils noted: 'Most of our sites are in rural areas and pose no risk to houses. The reporting and site management requirements are also designed for large sites which are open daily. Some of ours are open fortnightly. Frequency of risk assessments is too onerous and should be at the most every 12 months. The fire management plan is a good guide if you had a very large site but over the top for our little sites. Stormwater and bunding again is over the top.'

Councils believe the solution is for the guide to have an assessment based on the amount of material being stored, throughput and nearest house. This can then allow high risk sites to undertake the full assessment and low risk sites to do something but not so detailed.

Municipal Association of Victoria

11. Victoria needs to set up 4 regional waste processing centers that are state of the art. In many countries these actually make a profit. DO IT NOW!!!!

convert waste to energy!

Victorian Ratepayers Action Group

12. 1. - Section 4 Risk Assessment
4b) review risk assessment at least every six months;and
Proposed change
4b) Suggest that the review is completed every 12 months, (its worth noting Worksafe is 5 yrly or when a change to plant or equipment occurs)
2. - Section 7.2.1 A. Stockpile Dimensions
. maximum height of any the stockpile for any type of baled CRWM is 4 metres or 4 bales (whichever is lower in height)
Proposed change
Suggest that the guideline changes to less than 4 metres in height regardless of bales size
3. - The guide is unclear on the process to close out or sign off with the authorities where stocks exceed the guidelines, even with suitable fire fighting equipment to deal with the excess stocks. Our first hand experiences with the Task Force have suggested different course of actions with no detail in the guidelines and indifferent to other EPA officers requests.
4. Related to the interim guideline
We require urgently, assistance from the EPA to intervene with regard to disposal of 'fire water' to the sewer system as the water authorities have inconsistent views across the State. ie Coolaroo has approval from Western Water to dump to sewer yet for Springvale South East Water has declined, we require assistance from the EPA / Task Force to have consistency across the State.

Visy Industries

13. A risk based approach must consider the actual risks. For example summer risk is heightened and consider raw materials.

Our fire management plan considers the risks of summer and winter (stockpile size) and also the type of material (wood). Wood stockpile is not a noxious fire and our plan considers that removing people and buildings to a defendable zone is more appropriate safe workplace action than engaging the contained low noxious emission fire. Wood burning is not a comparable risk to say tires or other fire type that the guideline determines as high risk.

This action plan to the fire risk is commensurate to other industries that have wood stock piles but are not EPA licensed sites.

Greenchip Recycling

14. Overall WM Waste Management Services is happy with the guidelines. However, there are few areas where more information would be useful.

When completing a storage inventory as per Appendix 1:

Is material that is stored in hooklift bins counted as a stockpile? if so what separation distances should there be between bins?

Where product bays are present with walls between the products eg. different types of mulches; would this be considered as one big stockpile or a number of small stockpiles separated by walls but no separation?

WM Waste Management Services

15. The Urban Heat Island (UHI) phenomena is not fully covered.

TCPA

16. It is not obvious from the guidelines how to achieve compliance for a small remote site. How does the EPA conduct the assessment to determine compliance/non compliance? Is there a weighting of the various sections (for example fire mitigation vs risk assessment)

A quick reference table relating to stockpile sizes and distances to assess compliance at Q8 would be helpful (not needing to go back through the document).

Recognition of the various sizes of facilities across the State and that Transfer Stations are managed differently to MRFs.

Appendix 2 relates to small scale facilities, but the self assessment relates to larger operations, there needs to be a consistency in the tools/information provided to assist owner/operators.

Some of the questions combine 2 items but only allow a yes or no answer for the combined items when each item may have a different answer. For example Page 20, Q3.1 Yes to litter but No to dust.

Small rural transfer stations: The guidelines are prescriptive and minimal requirements appear to onerous for small rural and remote resource recovery centers.

Large stockpiles are often required at remote sites to aggregate sufficient quantities of material to allow for viable processing.

The assessment and the guidelines appear suitable for large metropolitan sites where volumes are significantly greater than facilities in regional Victoria. With greater volumes comes increased viability.

The bigger metropolitan sites also pose a greater risk due to the amount and variety of materials stored as well as the close proximity to receptors.

Is there the opportunity to add size scales (facility size) and requirements based on waste volumes to the self- assessment?

A one size fits all approach has been adopted that renders small remote sites immediately

non compliant.

Minimal requirements that apply to small remote sites

North East Waste and Resource Recovery Group on behalf of the north east councils

17. CRWM storage is based mainly on large recycle centres and for small sites in is unreasonable for them to carry large water tanks etc.

Towong Shire Council