

Professor Barbara Norman
Deputy Chair Regional Development Australia
Fund (RDAF) Advisory Panel

Regional Development Australia Fund Advisory Panel Secretariat
Program Delivery Division Department of Regional Australia,
Regional Development Australia and Local Government
GPO Box 803 CANBERRA 2601

Dear Professor Norman

I am writing to you as a concerned ratepayer and citizen of the Sorell Municipality in regards to the proposed C Cell site at Copping .

As a member of the community the C Cell does not have the support of the majority of the Sorell community, the surrounding areas and the broader Tasmanian population.

Community consultation for the proposed C Cell was practically non-existent. The proponents, Southern Waste Solutions, barely met statutory obligations regarding consultation.

I feel as though Sorell ratepayers are being treated as a non-entity and not worthy of acknowledgement considering the Copping C Cell is proposed to contain hazardous waste from the whole of Tasmania and potentially Antarctica waste from Australia, France and possibly other countries. How are we supposed to carry such waste with no Quarantine facility available in Tasmania? If and when there is a spill, who pay's for the clean up? I as a ratepayer certainly do not support this C Cell and refuse to pay for such a clean up.

To conclude, the proposal is in direct opposition to the National Waste Management Policy 2009- where landfill is the least desirable.

I call on you, as a Panel Member for the RDAF 4th Round to exclude the Tasman application or request that the Tasman Council withdraw their application as it does not meet the Round 4 guide's criteria 5.

Sincere regards

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Sincere regards



Mr Justin Hanney
Regional Development Australia Fund
(RDFA) Advisory Panel
C/-

Regional Development Australia Fund Advisory Panel Secretariat
Program Delivery Division Department of Regional Australia,
Regional Development Australia and local Government
GPO Box 803 CANBERRA 2601

Dear Mr Hanney

This letter is in regards to the opposed C Cell at Copping.
I, as many other community members, appose the development of the C Cell.

I strongly urge you, as a Panel Member, to request the withdrawal of the Tasman Council application as it does not meet the Round 4 Guide's criteria.

We as ratepayers and community members have not been respectfully advised on this proposal.

The landfill Sustainability Guide, 2004, recommends:
"the community should be provided with adequate information and opportunity to comment. This may be provided through public meetings , pamphlets, information booths at local events etc. The detail of information provided will vary from proposal to proposal but should always include an assessment of the potential impact s of a proposal on the local community (e.g employment opportunities, altered traffic volumes, noise and odour)."

The impact on Sorell and surrounding communities is horrendous. The extra heavy traffic on our narrow roads and two single lane causeways is a disaster waiting to happen. To add, the "clean up" expenses and cost involved, if and when a spill happens, should not be left up to the ratepayers of the community .

Please take time to hear the people's voices.
We say NO to the Copping C Cell.

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10 Provence Drive
Carlton TAS 7173

14 March 2012

Mr Christian Zahra
Chair Regional Development Australia Fund (RDAF) Advisory Panel
C/-

Regional Development Australia Fund Advisory Panel Secretariat
Program Delivery Division Department of Regional Australia,
Regional Development and Local Government
GPO Box 803 CANBERRA ACT 2601

Dear Mr Zahra

**Re Application: RDAF Round 4, Tasman Council, Copping Landfill Category C
(controlled waste) Cell, Southern Tasmania**

Tasman Council has a minor share (8%) in the four Council Waste Management Authority, Southern Waste Solutions (SWS). Also the proposed C cell site in Copping is in the Sorell Municipality and not in the Tasman Municipality.

The Southern Beaches Conservation Society Inc. (SBCS), as a representative group from within the Sorell community, has great concern regarding the Regional Development Australia Fund (RDAF) Expression of Interest (EOI) and subsequent Application by the Tasman Council for funding of the Controlled Waste C cell in Copping, Southern Tasmania.

SBCS completely oppose this development going ahead and request that you urgently consider our concerns when reviewing any application received for funding of the Copping C cell development.

The reasons for our concern are summarized below:

- 1) **The proposed C cell does not have the support of the majority of the Sorell community and the broader Tasmanian population.**
 - Community consultation for the proposed C cell by the proponent was practically non-existent. The proponents, Southern Waste Solutions (SWS), barely met statutory obligations regarding consultation.
 - Following a complaint letter from a landowner adjoining the proposed site the complainant was advised that the permit had already been granted. The land owner took action and called a public meeting to advise the Community of the intentions of

SWS to construct a 'Controlled' or hazardous waste C cell at the Copping land fill site. This was the first information provided to the Community about the C cell. Over two hundred people crowded into the local hall to hear about the proposed C cell and its implications for the Community.

- From this initial meeting, the proponent SWS, arranged a public meeting at which they insisted they had "done the right thing" in consulting with the community and that they (SWS) would provide a month for feedback from the community, but as they already had their permit to go ahead, nothing would stand in their (SWS) way to go ahead with the development. They also advised that they distributed 500 leaflets within the Community – none of which have ever been found.
- Dump the Toxic Dump (DTTD), a group of concerned Community members, was formed. This soon extended to become Southern Beaches Conservation Society Inc. (SBCS). SBCS has grown exponentially over the ensuing months, mostly out of community concern about the proposed C cell. This is fast becoming not just an issue within the local Sorell Community but is seen as an overall State issue. SBCS membership and support now includes interested parties from all over Tasmania and the mainland.
- Within one month of the initial community meeting, an anti-C cell petition, adhering to Sorell Council by-laws, was signed by over 20 per cent of the Sorell community. The petition was presented to Sorell Council on 5 October 2012 and was accepted by Councilors to be included on the agenda for the next Council meeting on 16 October 2012.
- Following acceptance of the petition by Sorell Council, at the meeting on 16 October, SBCS requested that Council call a community meeting at which Councilors would answer questions regarding the proposed C cell. The then acting Mayor agreed this would occur as soon as practicable and December was mentioned as a possibility.
- Importantly, at the time of writing, even though Council has been approached on numerous occasions regarding their agreement to hold a public community meeting, nothing has come of this request and no meetings or further discussion has been held with the community by Council. As one of the Joint owners of the proponent (SWS), Sorell Council are clearly showing their disregard for their own community, in not responding to this petition by calling a public meeting.
- The Landfill Sustainability Guide, 2004 (P 17, Community Liaison), recommends: "the community should be provided with adequate information and opportunity to comment. This may be provided through public meetings, pamphlets, information booths at local events etc. the detail of information provided will vary from proposal to proposal but should always include an assessment of the potential impacts of a proposal on the local community (e.g. employment opportunities, altered traffic volumes, noise and odour)."
- The impact on the Sorell and surrounding communities will be horrendous. The extra heavy vehicular traffic on the narrow winding road of the Arthur Highway, over the two single lane causeways at Midway Point, following the Port Arthur tourist route, is an accident waiting to happen. Already a high volume of trucks, carting waste from transfer stations throughout the Southern Region, traverse this route, driving up gravel from the sides of the roads into the windscreens of other road users.
- Considering that the Copping C cell is proposed to take all the hazardous waste from the whole of Tasmania and potentially Antarctic waste from Australia and France with a likelihood of other countries being included (although how this is supposed to go ahead with no Quarantine facility in Tasmania is questionable), with what ostensibly, was no consultation, is treating Sorell ratepayers as non-entities, not worthy of acknowledgement. This smacks of the USA in the 1970's, research by Sanjour and of the more recent Australian, 'The Case against the South Cardup Landfill extension',

in Western Australia. Copping has been designated as a LULU (Local Undesirable Land Uses) or Sacrifice Zone.

- 2) The Copping waste disposal site was originally selected for a B cell, general household waste, from a number of sites around southern Tasmania over 20 years ago. It has not been proven that the site is environmentally suitable for a C cell, which will receive 'spadeable' heavy metal, oil and industrial chemical waste. Evidence points to the fact that it clearly is not a viable site, and has only been chosen for convenience.
- There has been no research provided by the proponent SWS or State Government on the suitability of the Copping site to take Controlled waste in the form of a C cell – this in turn means that there has never been an environmental impact study on the proposed C cell location at Copping.
 - Twenty years ago this was not required for the B cell. Twenty years ago Copping and the surrounding area of Carlton and Dodges Ferry was a low population density, rural area. Much has changed in the intervening years but not as far as the proponents and State Government are concerned.
 - The population of the Sorell municipality has increased by 25 per cent in the last 10 years. The Southern Beaches is a popular location, 40 minutes from Hobart, with many trades people, semi professional and professionals, electing to make beach side living a preferred environment in which to raise a family. The Copping site, because of its size and because it already exists as a B cell landfill site operated by the proponent, has been deemed the ONLY site available for a C cell within Tasmania. The C cell proposition has been accepted by Government, with no thought of the changes to waste management requirements over the last 20 years and with no apparent or transparent consideration for any other site. Acceptance of the C cell will condemn Tasmania to no changes to waste management into the future.
- 3) From day one of operation of the C cell an ongoing engineering risk mitigation strategy features in the development of the C cell – a mitigation strategy that will need to run for the life of the C cell and in-perpetuity!
- The proponent has proposed that an engineering solution of pumping the leachate to holding ponds for evaporation is in place from day one of operation, to mitigate the risk of groundwater coming into contact with leachate from the C cell. How long this pumping will be required, even after the closure and capping of the C cell, it is not possible to know but it will need to continue in order to achieve reduction of the liquid in the landfill well into the future.
 - Risk mitigation strategies should be deployed where the risk has been deemed as a high likelihood of occurring. Due to the geological and geographical nature of the proposed site, the risk of leachate escaping into the surrounding environment is deemed high by the Environmental Protection Agency (EPA), and therefore the deployment of this risk mitigation strategy is effective from day one for this proposal.
 - It is clearly apparent from the proponents' permit application (and subsequent documentation), that due consideration of environmental impacts from leachate, ongoing costs of maintaining this 'mitigation' strategy and other risks such as bushfires, have not been fully investigated and the site is being developed ONLY because there is an existing B cell in operation already, with modifications (risk mitigations) made to fit a C cell on site – not that this site is environmentally suitable for a C cell!
 - During the recent Forcett bushfires the Chief Executive Officer of SWS was quoted in local media that the existing Copping B cell site was not impacted by fire, as if this

was further testament to the safety of the facility. That the fire, though extremely fierce, was very fickle and missed many places along its route, was not raised. The fact that the Copping site had to be evacuated for some time and therefore effectively shutdown, was also not mentioned.

- The land surrounding the site is a heavily forested, fire prone location as recently demonstrated. In the future event of the existence of a C cell, fires would be catastrophic, not only causing the cover and liner of the C cell to disintegrate and toxic gasses to escape into the atmosphere, but there would be no leachate pumping as required to maintain a safe facility, thereby causing heavy metal contaminated leachate to leak into the surrounding land, into the water table and consequently the Carlton River catchment, which has a huge flow on effect to the Southern Beaches of Frederick Henry Bay and Bruny Bio-Region.
- SBCS considers that the C cell will fail to Sorell ratepayers, current and future, to maintain and remediate when the proposed C cell membrane ruptures and heavy metal leachate permeates into the environment, including waterways.
 - *(Suppliers of all types of HDPE membrane will not guarantee that there are no faults. In fact they advise that: the membrane will have small holes; and they cannot guarantee the welded joints when it is used as a lining material.)*
- SBCS research clearly articulates that geologically and geographically, the Copping site is not suitable for a controlled waste C cell. I urge you to read a copy of the SBCS report: 'A better Waste Management Future for Tasmania, 2012' (available online at: <https://docs.google.com/file/d/0BwIFxVW4ZD6NbmhzblJhblW1Zlhc/edit> (printed copies to be forwarded as soon as available)).

4) Tasmania does not have a Statewide Waste levy on controlled waste and overall, a shameful record of meeting criteria and guidelines set out in the National Waste Policy (2009), or the state Waste Management Sustainability Guide (2004).

- A question regarding the introduction of a State waste levy on Controlled Waste was recently put to the Tasmanian State Economic Development Minister, the Hon. David O'Byrne MP, by SBCS members. The Minister could not say that a State per tonne levy on Controlled Waste would be charged in the foreseeable future, even though in other States, very high levies are imposed as a deterrent to landfill in favor of remediation (reduce, reuse, re-process).
- This is one area where Tasmania shamefully falls behind the rest of the Nation - to allow controlled waste to be disposed of in landfill without ANY significant consideration and investment into utilising waste as a resource is not regional development but economic sustainability suppression of the highest order. There is no accountability for waste producers who will be able to cheaply dispose of their toxic legacies into landfill.
- There is also no economic incentive for waste as a viable business to be developed as alternatives to landfill. Those businesses who attempt to develop genuine waste resource remediation opportunities in Tasmania will find themselves undercut by a local Government owned entity (SWS), offering a cheaper and less efficient method for dealing with Controlled waste.
- Tasman Council in their RDAF Application and SWS as the proponent of the C cell, may furnish letters of support from industry and Government, State and Local, from around the State. They have been heavily lobbying, advising that the C cell is the only viable way to clean up legacy waste in Tasmania, but this is in fact misleading and covers the real fact that landfill is being sold as the only alternative to clean up industrial toxic legacy waste and the only viable future option! A sound business case for the C cell development is yet to be provided to the Tasmanian community by the

Tasmanian Government and by the proponent, and the need for a C cell has not yet been proven.

- There are many other criteria through which the proposed Copping C cell does not meet the current National Policy on waste management 2008. It is reliant on state legislation the Environmental Management and Pollution Control Act 1994, which is 19 years old, outdated and in contravention of National Government policy.

5) In closing, I would like to point out that the *Tasmanian State Economic Development Plan 2012*, and particularly the *Southern Regional Development Plan 2012*, purports to have consulted widely with the Tasmanian Community on the major Economic Developments (which includes a C cell at Copping).

- We have found no evidence that any Sorell community member was consulted by the Reference Group for the Tasmanian State Government Economic Development Plan 2012 or the Southern Region Reference Group for the Southern Region Development Plan 2012, on the proposed Copping Controlled waste C cell. In fact consultation for both Economic Development Plans was at such a high level that no specific detail was discussed during consultations.

In conclusion I call on you, as a Panel Member for the RDAF 4th Round to veto the Tasman application or request that the Tasman Council withdraw their application as it does not meet the Round 4 Guide's criteria 5. 'Evidence of community support'.

Please contact me if you require further information.

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(controlled waste) Cell, Southern Tasmania**

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- Risk mitigation strategies should be deployed where the risk has been deemed as a high likelihood of occurring. Due to the geological and geographical nature of the proposed site, the risk of leachate escaping into the surrounding environment is deemed high by the Environmental Protection Agency (EPA), and therefore the deployment of this risk mitigation strategy is effective from day one for this proposal.
- It is clearly apparent from the proponents' permit application (and subsequent documentation), that due consideration of environmental impacts from leachate, ongoing costs of maintaining this 'mitigation' strategy and other risks such as bushfires, have not been fully investigated and the site is being developed ONLY because there is an existing B cell in operation already, with modifications (risk mitigations) made to fit a C cell on site – not that this site is environmentally suitable for a C cell!
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Tasmanian Government and by the proponent, and the need for a C cell has not yet been proven.

- There are many other criteria through which the proposed Copping C cell does not meet the current National Policy on waste management 2009. It is reliant on state legislation the Environmental Management and Pollution Control Act 1994, which is 19 years old, outdated and in contravention of National Government policy.

5) In closing, I would like to point out that the *Tasmanian State Economic Development Plan 2012*, and particularly the *Southern Regional Development Plan 2012*, purports to have consulted widely with the Tasmanian Community on the major Economic Developments (which includes a C cell at Copping).

- We have found no evidence that any Sorell community member was consulted by the Reference Group for the Tasmanian State Government Economic Development Plan 2012 or the Southern Region Reference Group for the Southern Region Development Plan 2012, on the proposed Copping Controlled waste C cell. In fact consultation for both Economic Development Plans was at such a high level that no specific detail was discussed during consultations.



In conclusion I call on you, as a Panel Member for the RDAF 4th Round to veto the Tasman application or request that the Tasman Council withdraw their application as it does not meet the Round 4 Guide's criteria 5. 'Evidence of community support'.

Please contact me if you require further information.

Sincere regards

Angela Marsh
President,
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10 Provenance Drive
Carlton TAS 7173

14 March 2012

Professor Barbara Norman
Deputy Chair Regional Development Australia Fund (RDAF) Advisory Panel
C/-

Regional Development Australia Fund Advisory Panel Secretariat
Program Delivery Division Department of Regional Australia,
Regional Development and Local Government
GPO Box 803 CANBERRA ACT 2601

Dear Professor Norman

**Re Application: RDAF Round 4, Tasman Council, Copping Landfill Category C
(controlled waste) Cell, Southern Tasmania**

Tasman Council has a minor share (8%) in the four Council Waste Management Authority, Southern Waste Solutions (SWS). Also the proposed C cell site in Copping is in the Sorell Municipality and not in the Tasman Municipality.

The Southern Beaches Conservation Society Inc, (SBCS), as a representative group from within the Sorell community, has great concern regarding the Regional Development Australia Fund (RDAF) Expression of Interest (EOI) and subsequent Application by the Tasman Council for funding of the Controlled Waste C cell in Copping, Southern Tasmania.

SBCS completely oppose this development going ahead and request that you urgently consider our concerns when reviewing any application received for funding of the Copping C cell development.

The reasons for our concern are summarized below:

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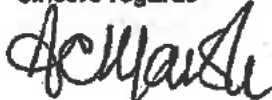
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10 Provence Drive
Carlton TAS 7173

14 March 2012

Doctor Fiona McKenzie
Regional Development Australia Fund (RDAF) Advisory Panel
C/-

Regional Development Australia Fund Advisory Panel Secretariat
Program Delivery Division Department of Regional Australia,
Regional Development and Local Government
GPO Box 803 CANBERRA ACT 2601

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 - Risk mitigation strategies should be deployed where the risk has been deemed as a high likelihood of occurring. Due to the geological and geographical nature of the proposed site, the risk of leachate escaping into the surrounding environment is deemed high by the Environmental Protection Agency (EPA), and therefore the deployment of this risk mitigation strategy is effective from day one for this proposal.
 - It is clearly apparent from the proponents' permit application (and subsequent documentation), that due consideration of environmental impacts from leachate, ongoing costs of maintaining this 'mitigation' strategy and other risks such as bushfires, have not been fully investigated and the site is being developed ONLY because there is an existing B cell in operation already, with modifications (risk mitigations) made to fit a C cell on site – not that this site is environmentally suitable for a C cell!
 - During the recent Forcett bushfires the Chief Executive Officer of SWS was quoted in local media that the existing Copping B cell site was not impacted by fire, as if this

was further testament to the safety of the facility. That the fire, though extremely fierce, was very fickle and missed many places along its route, was not raised. The fact that the Copping site had to be evacuated for some time and therefore effectively shutdown, was also not mentioned.

- The land surrounding the site is a heavily forested, fire prone location as recently demonstrated. In the future event of the existence of a C cell, fires would be catastrophic, not only causing the cover and liner of the C cell to disintegrate and toxic gasses to escape into the atmosphere, but there would be no leachate pumping as required to maintain a safe facility, thereby causing heavy metal contaminated leachate to leak into the surrounding land, into the water table and consequently the Carlton River catchment, which has a huge flow on effect to the Southern Beaches of Frederick Henry Bay and Bruny Bio-Region.
 - SBCS considers that the C cell will fail to Sorell ratepayers, current and future, to maintain and remediate when the proposed C cell membrane ruptures and heavy metal leachate permeates into the environment, including waterways.
 - *(Suppliers of all types of HDPE membrane will not guarantee that there are no faults. In fact they advise that: the membrane will have small holes; and they cannot guarantee the welded joints when it is used as a lining material.)*
 - SBCS research clearly articulates that geologically and geographically, the Copping site is not suitable for a controlled waste C cell. I urge you to read a copy of the SBCS report: 'A better Waste Management Future for Tasmania, 2012' (available online at: <https://docs.google.com/file/d/0BwIFxW4ZD6NbmhzBUh1bW1ZeHc/edit> (printed copies to be forwarded as soon as available)).
- 4) **Tasmania does not have a Statewide Waste levy on controlled waste and overall, a shameful record of meeting criteria and guidelines set out in the National Waste Policy (2009), or the state Waste Management Sustainability Guide (2004).**
- A question regarding the introduction of a State waste levy on Controlled Waste was recently put to the Tasmanian State Economic Development Minister, the Hon. David O'Byrne MP, by SBCS members. The Minister could not say that a State per tonne levy on Controlled Waste would be charged in the foreseeable future, even though in other States, very high levies are imposed as a deterrent to landfill in favor of remediation (reduce, reuse, re-process).
 - This is one area where Tasmania shamefully falls behind the rest of the Nation - to allow controlled waste to be disposed of in landfill without ANY significant consideration and investment into utilising waste as a resource is not regional development but economic sustainability suppression of the highest order. There is no accountability for waste producers who will be able to cheaply dispose of their toxic legacies into landfill.
 - There is also no economic incentive for waste as a viable business to be developed as alternatives to landfill. Those businesses who attempt to develop genuine waste resource remediation opportunities in Tasmania will find themselves undercut by a local Government owned entity (SWS), offering a cheaper and less efficient method for dealing with Controlled waste.
 - Tasman Council in their RDAF Application and SWS as the proponent of the C cell, may furnish letters of support from industry and Government, State and Local, from around the State. They have been heavily lobbying, advising that the C cell is the only viable way to clean up legacy waste in Tasmania, but this is in fact misleading and covers the real fact that landfill is being sold as the only alternative to clean up industrial toxic legacy waste and the only viable future option! A sound business case for the C cell development is yet to be provided to the Tasmanian community by the

Tasmanian Government and by the proponent, and the need for a C cell has not yet been proven.

- There are many other criteria through which the proposed Copping C cell does not meet the current National Policy on waste management 2009. It is reliant on state legislation the Environmental Management and Pollution Control Act 1994, which is 19 years old, outdated and in contravention of National Government policy.
- 5) In closing, I would like to point out that the *Tasmanian State Economic Development Plan 2012*, and particularly the *Southern Regional Development Plan 2012*, purports to have consulted widely with the Tasmanian Community on the major Economic Developments (which includes a C cell at Copping).
- We have found no evidence that any Sorell community member was consulted by the Reference Group for the Tasmanian State Government Economic Development Plan 2012 or the Southern Region Reference Group for the Southern Region Development Plan 2012, on the proposed Copping Controlled waste C cell. In fact consultation for both Economic Development Plans was at such a high level that no specific detail was discussed during consultations.

In conclusion I call on you, as a Panel Member for the RDAF 4th Round to veto the Tasman application or request that the Tasman Council withdraw their application as it does not meet the Round 4 Guide's criteria 5. 'Evidence of community support'.

Please contact me if you require further information.

Sincere regards



Angela Marsh
President,
Southern Beaches Conservation Society Inc.