

Cleanaway Operations Pty Ltd

Melbourne Energy and Resource Centre

Development Licence Application - Response to community submissions

Reference: MERC-ARU-MEL-CECM-RPT-0002

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Contents

1. APPLICATION OVERVIEW	3
1.1 Introduction.....	3
1.2 Proposal background.....	3
1.3 Purpose	3
2. SUBMISSIONS ANALYSIS	4
2.1 Overview	4
2.2 Respondent representation	4
2.3 Level of support for the Proposal.....	5
2.4 Potential impacts questionnaire	5
2.5 Submission themes	6
3. CONCLUSION AND ONGOING ENGAGEMENT	17
3.1 Ongoing engagement	17

1. Application Overview

1.1 Introduction

Cleanaway Operations Pty Ltd (Cleanaway) is an Australian integrated waste management, recycling, and industrial services company proposing to develop a waste-to-energy (WtE) facility in Victoria known as the Melbourne Energy and Resource Centre (MERC) (the Proposal). The proposed site at 510 Summerhill Road (Wollert) is within an area that is transitioning from agricultural use to urban uses with an employment and industrial focus.

Cleanaway has lodged a Development Licence Application (DLA) for the Proposal with the Environment Protection Authority (EPA) under the *Environment Protection Act 2017* (EP Act). In addition, a Planning Permit Application (PPA) under the *Planning and Environment Act 1987* (P&E Act) has been lodged. The DLA and PPA have been publicly exhibited concurrently on the same Engage Victoria website.

The DLA was submitted to the EPA on 15 December 2023. The PPA was submitted to the Minister for Planning on 18 December 2023. A combined public exhibition process was established for the applications which commenced on 20 February 2024. In consultation with DTP, the EPA decided to extend the public exhibition period to 14 April 2024 to allow additional time for community and stakeholder submissions. Both applications were on public display for a period of 55 days.

During the public exhibition period, community and stakeholders were invited to provide a submission on the MERC Proposal via the Engage Victoria website. In total, 763 submissions were received on the DLA. This report provides an analysis of the submissions received from the community and stakeholders on the DLA.

1.2 Proposal background

The Proposal is designed to thermally treat 380,000 tonnes per annum (tpa) of waste feedstock that would otherwise be sent to landfill, primarily consisting of residual Municipal Solid Waste (MSW) and residual Commercial and Industrial (C&I) waste. Waste processed at the facility will be subject to a Waste Acceptance Protocol to ensure only appropriate and permitted waste is used as feedstock. The Proposal will also incorporate maturation and processing of Incinerator Bottom Ash (IBA), generated from the combustion of waste, to recover recyclable metals and produce an aggregate product suitable for road construction.

The Proposal meets the Prescribed Activity definition for **A08: Waste to Energy** under the EP Act, which triggers the requirement for a Development Licence and an Operating Licence from the EPA.

Table 1: Primary prescribed activity of the Proposal

Code	Summary Description	Description	Permission	Application
A08	Waste to Energy	Recovering energy from waste at a rated capacity of at least 3MW of thermal capacity, or at least 1MW of electrical power	Development Licence	APP024914
			Operating Licence	Future submission

1.3 Purpose

The report has been developed to present Cleanaway's responses to submissions received from the community and stakeholders during exhibition of the DLA. This document has been developed to assist the EPA and members of the public to better understand the Proposal, including proposed controls to manage potential risks to human health and the environment. It also intends to provide the relevant supporting information to the EPA to make an informed assessment of the DLA for the Proposal.

2. Submissions Analysis

2.1 Overview

As part of the exhibition process for the DLA on the Engage Victoria website, the EPA provided an online submission form for respondents to complete. The online submission form required respondents to complete the following fields:

- Personal details (e.g. name, email address, postcode)
- Who the respondent is representing in the submission (drop-down list, selection from; *myself, another person, community organisation, advocacy group, other government organisation*) (refer to Section 1.2)
- Level of support for the Proposal (drop-down list, selection from; *support the proposal, support subject to licence conditions and object to the proposal*) (refer to Section 1.2)
- Provide comment or submission on the application (open field for text)
- Level of concern about the following potential impacts (drop-down list; *no concern, low concern, medium concern, high concern and unsure*) (refer to Section 1.4)
 - Air emissions (including dust)
 - Odour emissions
 - Noise emissions
 - Greenhouse gas emissions and consideration of climate change impacts
 - Impacts on land
 - Impacts on groundwater
 - Impacts on human health
 - Waste management practices
 - Monitoring and reporting of emissions.
- Suggestions or proposed conditions for how concerns could be dealt with (open field)
- Additional information and letter submission (optional upload of document).

2.2 Respondent representation

One submission was received on behalf of a public authority; 16 were submitted by a community organisation or advocacy group and 746 were submitted by community members.

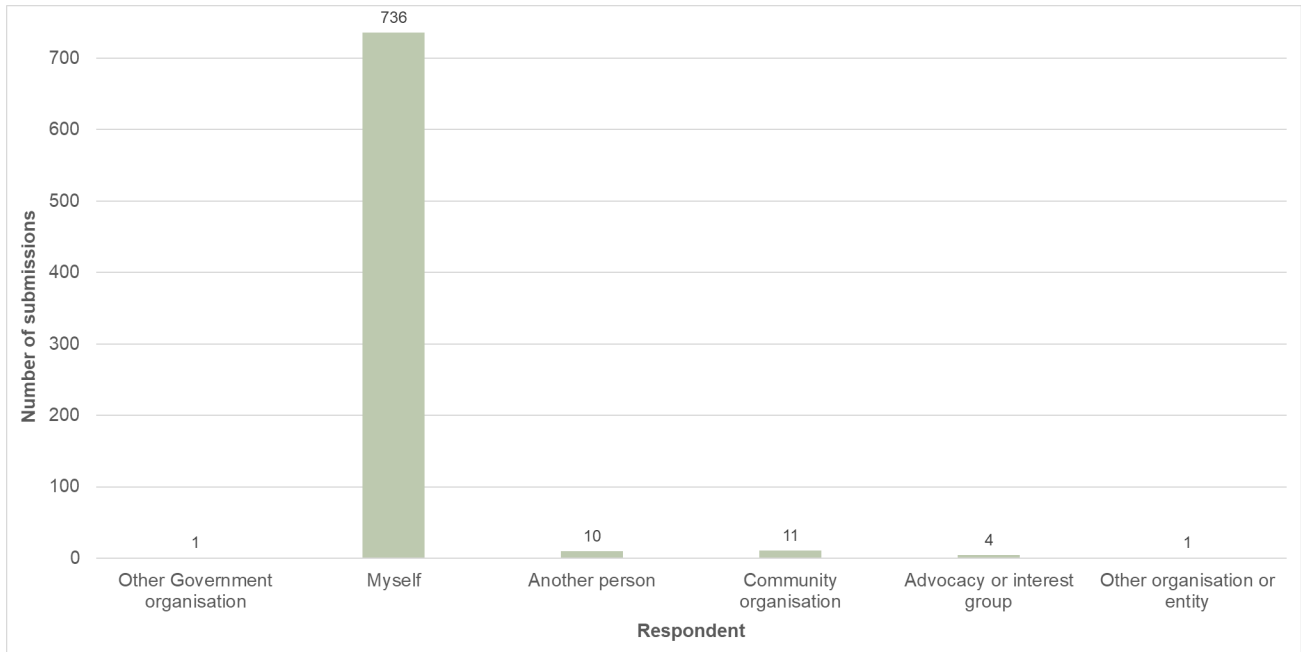


Figure 1: Submissions by respondent type

2.3 Level of support for the Proposal

Community submitters were asked to indicate their position on the Proposal via the Engage Victoria website. Of the 763 submissions received:

- Six submissions were provided in support of the Proposal. Five of these submissions indicated high concern for potential impacts, with two indicating a preference for the Proposal to be relocated to an alternative location and three providing no comment
- Five submissions were provided in support of the Proposal pending licence conditions. Comments from these submissions focused primarily on improved reporting, monitoring, and regulation of emissions and waste outputs
- The remaining 752 submissions provided were in objection of the Proposal. Of these, 197 provided no comment on their objection to the Proposal and therefore were unable to be categorised into an issue category.

2.4 Potential impacts questionnaire

As part of the online submission form on the Engage Victoria website, respondents were asked to rate their level of concern in relation to key aspects of the facility.

Respondents were required to indicate their level of concern using a predefined rating system; *no concern*, *low concern*, *medium concern*, *high concern* and *unsure*. A summary of responses to key concerns is provided in Figure 2.

A total of 6,858 responses were provided (across all the above categories). *High concern* was the primary indication across all categories. Air emissions, odour emissions, and impacts on human health received the most responses with a *high concern* rating, with 747, 734 and 752 responses respectively.

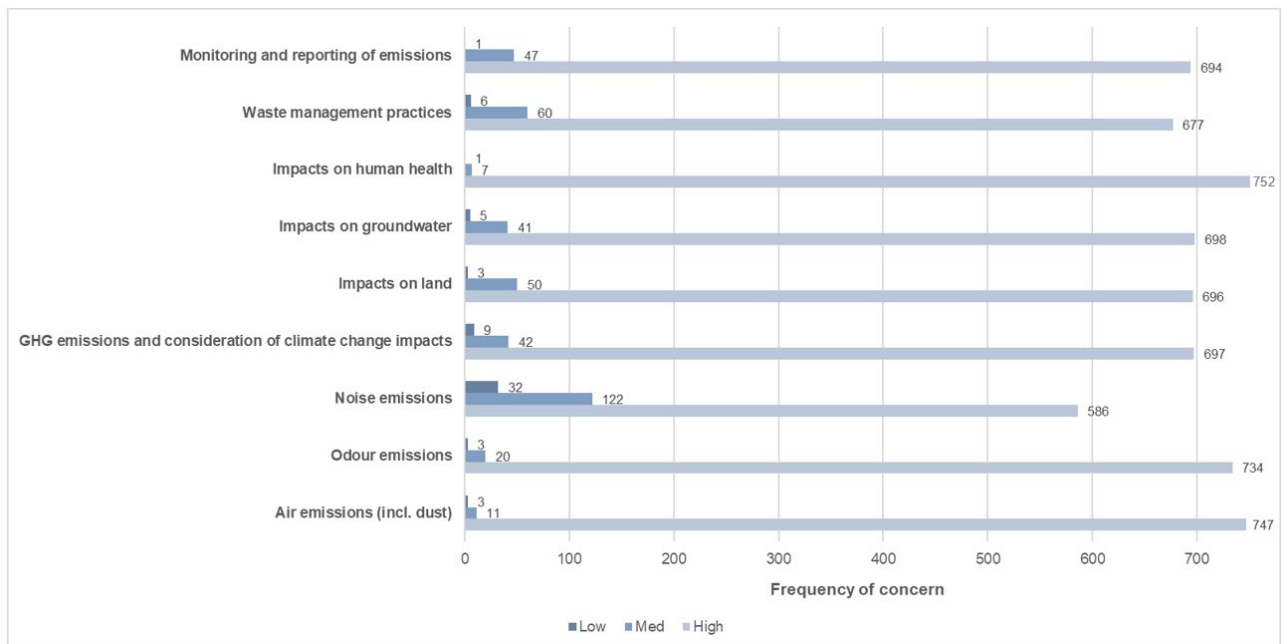


Figure 2: Key concerns raised in community submissions

2.5 Submission themes

A total of 745 submissions were submitted via the online form (with free-form open text provided), 13 were submitted as a letter, and five were submitted as a report.

Theme categorisation

Community submissions were reviewed to categorise themes according to the following steps:

- Reviewing the content of each submission to identify the key themes raised
- Allocation of issues raised to an overall key theme category (e.g. air quality and odour)
- Preparation of a detailed response to each theme identified.

The majority submissions centred around perceived impacts to human health, air quality and odour, facility location and waste feedstock. However, some additional matters were also raised such as impacts to traffic and transport and surrounding environmental values. The theme categorisation process provided an understanding of the frequency of themes raised and key areas of interest.

All submissions have been responded to according to the themes raised. Where no comment has been provided on a submission, a standard acknowledgement of receipt has been detailed.

Summary of themes raised in community submissions

A breakdown of the themes raised in community submissions is provided in Table 1 by category. Given most submissions raised more than one theme or the same theme more than once, the total number of themes identified is greater than the total number of submissions received. A total of 1051 themes were raised in the community submissions. There were 197 submissions with no comment provided, and 48 stating general objections to the Proposal or further industrial development in the Wollert area. As these submissions were not able to be allocated to a theme category, they are not presented in Table 1.

Table 2: Key themes raised in community submissions

Theme category	Number of times theme was raised	Percentage (%) of total themes
Location	413	39.3%
Human health	269	25.6%
Air quality and/or odour	146	13.9%
Environmental impacts	53	5%
Property values	39	3.7%
Waste feedstock	35	3.3%
Traffic	32	3.0%
Cleanaway's track record	22	2.1%
Stakeholder engagement/complaint process	19	1.8%
Light and/or noise pollution	13	1.2%
Circular economy/zero-waste alternatives	10	1.0%

A breakdown of the number of times each theme category was raised is presented in Figure 3.

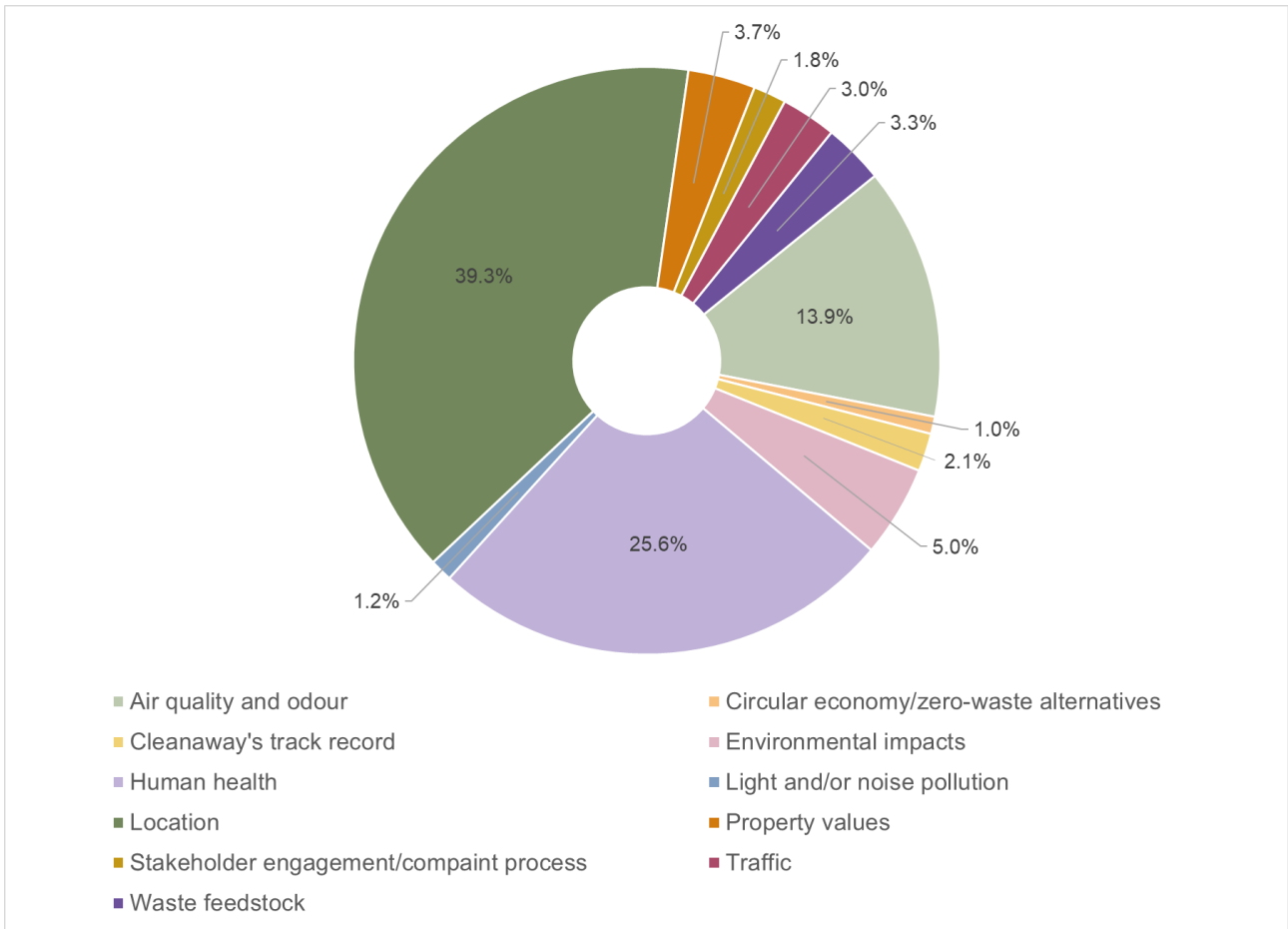


Figure 3: Key themes raised in community submissions

Table 2 outlines Cleanaway’s response to key themes provided as part of the submissions.

Table 3: Key themes identified within the community submissions and standard responses

Key theme	Cleanaway response
Location	<p>Cleanaway conducted a comprehensive site-finding exercise to identify a suitable location for MERC, assessing approximately 200 potential sites for their appropriateness to accommodate the facility from both an operational perspective and with respect to separation from residential areas. Screening criteria included separation distances from sensitive receptors (>1 km), the allowed uses of the planning zone, and whether the site was free from overlays which pose major constraints. The selected site satisfied the above screening criteria and was deemed the most suitable site for development. The site is not located within an area that has been identified for future residential development. It forms part of the future Northern Quarries Precinct Structure Plan area and has existing quarries located directly to the north and south and an approved quarry located on adjoining land to the east. The proposed waste-to-energy facility offers an appropriate and productive use of the land, which is already surrounded by several industrial facilities making it unsuitable for residential development.</p> <p>In terms of proximity to sensitive receptors, the Proposal is located approximately 1.4km from existing residential areas in Wollert, approximately 2km from Epping, approximately 2.5km from Donnybrook, and approximately 3km from Craigieburn, as well as planned future residential developments such as Shenstone Park (approximately 1.2 km) and expansion of Wollert residential area (approximately 1.8 km).</p>
Human health	<p>The Human Health Risk Assessment (HHRA) concluded that there were no unacceptable risks to community health identified where the Proposal is designed to meet the specifications identified, and proposed mitigation measures are implemented. Emissions to air of persistent organic pollutants (POPs) (i.e. dioxins), carcinogens and heavy metals were all included in the HHRA. The HHRA for the MERC facility examined potential risks related to community exposure to emissions from construction and operation of the proposed facility, including air emissions, noise and water. The HHRA was prepared in accordance with Commonwealth and Victorian legislation and is in line with enHealth, National Environmental Protection Council (NEPC) and EPA guidelines. The HHRA concluded:</p> <ul style="list-style-type: none"> • Air Quality: There are no unacceptable risks for criteria pollutants (NO₂, SO₂, CO, PM_{2.5}, PM₁₀), relevant exposure scenarios for rainwater tanks, short term exposures (via inhalation) or long-term exposures (via inhalation and after deposition onto soil and uptake into home grown produce). The risk of odour impacts was also assessed as low. • Noise: Risks to community health will be low and acceptable in line with guidance from Australian health authorities. This is based on consideration of the EPA Victoria requirements for noise assessment and ensuring that the facility is designed to meet the relevant levels and that all identified noise mitigation measures are implemented. • Other matters (water, soil contamination, groundwater, dangerous goods/chemicals hazards): Risks to community health in relation to issues related to water or chemical hazards from this facility will be low and acceptable in line with guidance from Australian health authorities. <p>In relation to other chemicals of concern, the HHRA also considered PFAS and notes:</p>

Key theme	Cleanaway response
<p>Air quality and / or odour</p>	<p>This facility has the capacity to manage small amounts of such chemicals [e.g. PFAS] appropriately if they were to be present in residual waste. The flue gas treatment technology proposed for this facility can address the presence of these chemicals using the following:</p> <ul style="list-style-type: none"> • Combustion chamber – PFAS are usually present in materials that could be in the waste as mixtures. Within those mixtures, some of this group of chemicals are readily degradable at temperatures easily reached in the chamber. Some do require higher temperatures to breakdown. It is noted that much of the chamber will have temperatures in excess of 1,000°C and these temperatures along with sufficient oxygen will allow for effective combustion of these chemicals. • Acid gas treatment (injection of lime) – the flue gas treatment technology proposed includes a process for removing acid gases from the air. This treatment process will also assist in the removal of the breakdown products from the destruction of PFAS. • Activated carbon treatment – activated carbon is added to the waste gases to remove metals and a range of other chemicals. This technology will also assist in removing PFAS. • Baghouse – chemicals attached to particles (including activated carbon particles) are captured within the baghouse. This will include PFAS. <p>The Air Quality technical assessment was conducted to satisfy a Level 2 Assessment as defined in EPA Victoria’s guideline for assessing and minimising air pollution in Victoria (Publication 1961). The air quality modelling conservatively assumed that both boiler lines were operating at maximum thermal input with emission concentrations at the upper end of the best available technique associated emission level (BAT-AEL) daily average concentrations for each potential pollutant. The BAT-AEL concentrations are associated with implementation of BAT for emission control and flue gas treatment, operating under normal operating conditions, as stated in the European BREF for Waste Incineration (BREF-WI, 2019). A short-term maximum emissions scenario was also considered, which assumed that one boiler line was operating at the half-hour average emission limit concentrations stated in the European Industrial Emissions Directive (IED, 2010), while the other line operated normally at the upper end of the BAT-AEL daily average concentrations for each potential pollutant. The daily average and half-hourly average emissions were evaluated under worst case meteorological conditions. The air quality modelling results indicated that, with proposed emission limit settings (i.e. the upper end of the BREF-WI BAT-AEL daily average concentrations and the IED half-hour average emission limits), the Proposal (in isolation) is predicted to have an insignificant impact on air quality, as measured against the relevant health-based and environmental Air Pollution Assessment Criteria (APAC) in Victoria. Variations in the calorific value of waste fuel were found to not significantly impact emissions due to the Proposal. In addition, a cumulative assessment was also conducted incorporating the adjacent Austral Bricks owned Brickworks and surrounding existing industrial activities identified within a 5km radius of the Proposal. It identified that the Proposal will not have a significant impact on air quality and will not individually exceed limits for any air pollutant, as measured against the relevant health-based and environmental based Air Pollution Assessment Criteria (APACs). Predicted cumulative ground-level concentrations of all air pollutants due to the Proposal comply with the relevant APACs across all sensitive receptors, with the exception of hydrogen fluoride, PM10 and PM2.5. This</p>

Key theme	Cleanaway response
<p>Environmental impacts</p>	<p>exception is a result of elevated background concentrations from surrounding industry and historical monitoring data including bushfire impacts, and not from the contribution of the Proposal.</p> <p>A Continuous (24x7) Emissions Monitoring System (CEMS) will provide real time feedback to the control systems to make automatic adjustments to reagent/adsorbent injection rates for the flue gas cleaning system. The CEMS will analyse the flue gas for all pollutants that must be continuously monitored. For pollutants where continuous monitoring is not feasible or necessary, routine sampling and testing will be established to ensure that the facility complies with environmental obligations. Auxiliary parameters such as flow rate, temperature, pressure, moisture content, oxygen and CO2 will also be measured as part of the CEMS.</p> <p>The Air Quality technical assessment for the MERC Facility included an odour assessment undertaken in accordance with the guidance for assessing odour (EPA Publication 1883) which sets out a risk-based approach to assess the risk posed by odour emission sources. The assessment was conducted to a Level 2 standard using the source-pathway-receiving environment tool. Due to design controls included within the Proposal, odour is not considered a problematic air emission during operation of the Proposal. Overall, the risk to human health and the environment from odour impacts during operation was assessed as low. This is due to the mitigation measures incorporated into design, such as; no unloading of waste outdoors, maintaining a negative air pressure within those areas within the facility where waste received, temporarily stored and thermally treated, and automatic entry and exit roller-doors to contain waste odour within the tipping hall.</p> <p>The Human Health Risk Assessment (HHRA) for the MERC Facility examined potential risks related to community exposure to emissions from the Proposal, including air emissions, noise, and water. The HHRA concluded that there were no unacceptable risks to community health identified where the Proposal is designed to meet the specifications identified, and proposed mitigation measures are implemented. Further details from the HHRA are summarised separately below.</p> <p>The DLA currently being considered by the EPA has required rigorous environmental assessment to ensure that Cleanaway will meet its General Environmental Duty such that it minimises, so far as reasonably practicable, risks of harm to human health and the environment.</p> <p>To demonstrate this, a range of environmental assessments have been undertaken to understand the potential for impacts associated with the Proposal. This includes assessments to understand risks to human health and the environment from air emissions, noise, hydrology, groundwater, bushfire, and ecology (amongst others). Appropriate mitigation and management measures are proposed within each assessment to minimise potential impacts to human health and the environment. These environmental assessments have directly informed the design and proposed operation of the MERC facility.</p> <p>An environmental risk assessment was undertaken to evaluate potential risks to human health and the environment associated with the construction, commissioning and operation of the facility, as well as to identify additional mitigation measures which could be implemented to reduce potential for harm. The environmental risk assessment was undertaken through a method</p>

Key theme	Cleanaway response
	<p>consistent with International Standard ISO 31000:2009, Risk management - Principles and guidelines (Standards Australia, 2009) and HB203:2006 – Environmental Risk Management, Principles and Process (Standards Australia, 2006).</p> <p>Summary of the Risk Assessment:</p> <ul style="list-style-type: none"> • The Proposal will not have a significant impact on air quality and will not individually exceed limits for any air pollution, as measured against the relevant health-based and environmental based Air Pollution Assessment Criteria. The Proposal has also been designed to provide an enclosed waste receipt hall, temporary storage and thermal treatment process, and assessment has therefore found that the risk of adverse odour impacts is low. • The Proposal will reduce net greenhouse gas emissions by around 230,000t of CO₂-e per year (compared with current practices) and provides the potential to avoid indirect greenhouse gas emissions from other sources, including avoiding methane emissions from landfill by diverting waste and generating electricity at a lower emissions intensity than the current Victorian electricity grid. The MERC will generate electricity at an emissions intensity of between 0.53-0.59tCO₂-e/MWh compared to Victorian coal-fired power stations at an emissions intensity of between 1.14-1.33tCO₂-e/MWh¹. • Siting of the facility (within an area of established and future extractive industries, approximately 2km away from existing and over 1km way from future zoned residential areas) and enclosing of key plant and equipment within the main buildings provides a primary basis for mitigation against noise impacts during operation of the facility. The addition of a noise barrier will provide further mitigation to residential receptor 475 Summerhill Road • No unacceptable risks to community health have been identified where the Proposal is designed to meet the specifications identified, and proposed mitigation measures are implemented. • Risks to surrounding waterways and drinking water quality within the Yarra River Basin are considered very low. There will be no discharge to the Merri Creek from the proposed MERC facility. The facility will have a closed loop design, ensuring no discharge of process wastewater under normal operating conditions. Rainwater harvested from building roofs will be directed to rainwater tanks to facilitate reuse within the process as an alternative to fresh raw water make-up. In addition, runoff from sensitive areas, where there is a risk of spills of chemicals or hydrocarbons, will either be housed indoors or bunded to prevent an overflow or discharge to surrounding areas. An onsite Integrated Water Management Strategy will also be considered for the Proposal, including vegetated detention basins and swales, permeable surfaces, tree planting and a recycled water system for on-site landscape irrigation. Early discussions between Melbourne Water and the design team have commenced and will continue occur to progress potential measures. Overall, the risk to surface water is considered to be low. • Risks to land and groundwater from the Proposal are primarily linked to contamination following fuel or chemical spills during construction and operation or dewatering during construction. These risks will be managed through standard environmental

¹ <https://cer.gov.au/markets/reports-and-data/nger-reporting-data-and-registers/electricity-sector-emissions-and-2#electricity-sector-emissions-and-production-data-2019%E2%80%9320>

Key theme	Cleanaway response
	<p>management practices during construction, through the appropriate design of chemical and auxiliary fuel storage areas and development of spill management procedures for implementation during operation of the MERC.</p> <ul style="list-style-type: none"> • The MERC facility also includes a stabilisation facility for Air Pollution Control residue, a necessary treatment step to immobilise leachable components prior to removal from site by vehicle and disposal at an appropriately licenced landfill. • The potential effects on native vegetation and other biodiversity values are not significant due to the siting of the project on cleared agricultural land. Offsets for limited impacts to native vegetation and biodiversity values can be readily addressed in accordance with the Whittlesea Planning Scheme. • Risks to Aboriginal cultural heritage are being managed through a Cultural Heritage Management Plan, approved by the Wurundjeri Woi Wurrung Aboriginal Corporation.
<p>Property values</p>	<p>The site is not suitable for ongoing agricultural purposes and the land has been identified as part of a precinct that will transition to urban industrial/employment purposes over time.</p> <p>This transition is expected to be supported by necessary infrastructure through the State Government’s Precinct Structure Planning process, to ensure the precinct is well connected to services, access, customers and suppliers, and also to ensure that the precinct flourishes as a desirable location for businesses to establish and grow. The MERC will be one of many commercial and industrial buildings in a location that is appropriately connected to residential areas.</p> <p>Delivering an employment precinct in this location will ensure that the new communities establishing in Melbourne’s north have convenient access to jobs. Over time, this should positively impact the value of residential land located within and surrounding the Northern Quarries PSP area.</p>
<p>Waste Feedstock</p>	<p>The primary objective of the MERC is to support best practice waste management by upholding the waste hierarchy, which recognises recycling and recovery as higher order actions than disposal. The waste feedstock to be processed at the facility will include:</p> <ul style="list-style-type: none"> • Residual Municipal Solid Waste (MSW) waste (that is ‘permitted’ waste under the Victorian waste to energy framework, 2021 (WtE framework)) • Residual commercial waste, including residual Commercial & Industrial (C&I) waste and residual combustible Construction & Demolition (C&D) waste that cannot be practicably recycled (that is ‘permitted’ waste under the Victorian WtE framework) • Any other waste streams defined as ‘acceptable’ in the waste acceptance protocol (that may be ‘permitted’ or ‘exempt’ wastes under the Victorian WtE framework). <p>The majority of the waste to be processed will be residual MSW and residual C&I waste, with smaller fractions of pre-sorted residual combustible C&D and other wastes. All waste received at the facility will be subject to the MERC Waste Acceptance Protocol, which requires source-separated recyclable materials, Food Organic and Garden Organic (FOGO) waste and other non-permitted/unacceptable waste streams such as e-Waste and hazardous waste and focuses the feedstock on waste which would</p>

Key theme	Cleanaway response
<p>Traffic</p>	<p>otherwise have been destined for landfill disposal. The MERC will therefore divert residual waste from landfill disposal, supporting the Victorian Government targets for recycling and landfill diversion, responsible waste management and reducing the burden of landfills on the environment and communities.</p> <p>The Victorian WtE framework describes how the thermal WtE feedstock cap will operate and defines appropriate waste categories for thermal WtE facilities. The MERC’s proposed feedstock streams (residual MSW and residual commercial waste) are permitted waste streams for thermal WtE and will be subject to the provisions of a cap licence. Banned waste streams for thermal WtE include FOGO waste; glass; mixed recycling; also C&I and C&D waste that can be practicably recycled.</p> <p>During construction, transport routes and access to the site will be carefully directed away from residential areas and sensitive receptors. Furthermore, hours of operation will be strategically planned to minimise impacts, and efforts will be made to limit the number of construction vehicles. During operation, vehicles transporting waste to and from the site will be appropriately licensed with controls in place. Additional measures such as driver awareness training and fleet improvements may further reduce off-site traffic impact on nearby residents.</p> <p>Both a Construction Traffic Management Plan (CTMP) and an Operational Traffic Management Plan (OTMP) will be developed with measures to reduce traffic impacts such as adjusting shift patterns and encouraging car sharing.</p>
<p>Cleanaway’s track record</p>	<p>Cleanaway takes compliance with regulatory requirements relating to the operations of facilities very seriously. Protection of the environment and safety are foundational principles for Cleanaway. Following any historical incidents, Cleanaway has carried out full investigations into the root cause. This has given Cleanaway the opportunity to learn and consider means to prevent recurrence. Additionally, this has granted the opportunity for lessons learned to improve environmental risk management and risk mitigation. This process is documented and undertaken with a view to sharing information across all relevant Cleanaway sites.</p> <p>Operating in Australia for over 50 years, Cleanaway is a total waste management, industrial, environmental and health services company. Over its history, Cleanaway has grown its diverse portfolio of infrastructure assets and currently manages approximately 330 sites, 125 of which are licensed (by the relevant regulator, e.g. EPA for those in Victoria) facilities. The scale and complexity of these operations should not be understated. Within Victoria, Cleanaway runs 69 facilities, including Melbourne Regional Landfill (MRL), Melbourne’s largest landfill operation. The MRL receives over 2,500,000 tonnes of waste each year from Council’s, business and public customers and is a critical facility in the management of Victoria’s waste. The EPA has closely monitored the MRL since 2013, conducting inspections at least once per month, and states on its website that the facility is generally well managed. This track record is the product of Cleanaway’s diligent, safe and responsible operational practices and its capability to comply with regulator requirements.</p>
<p>Stakeholder engagement / complaint process</p>	<p>Since December 2021, Cleanaway has been engaging with key stakeholders to provide project updates and seek their feedback on various stages of the Proposal development. Engagement activities included site visits, targeted meetings and briefings. Cleanaway will continue to engage with the community and key stakeholders during and beyond the DLA process.</p>

Key theme	Cleanaway response
<p>Light and / or noise pollution</p>	<p>Cleanaway is committed to the construction and operation of the MERC facility in line with international best practices and the Victorian WtE Framework. Communication channels to advise of any complaints or issues will be established and shared with Stakeholders and the Community prior to commencement of construction. During construction, it is planned that the appointed Contractor will be responsible for managing complaints, with the appointed Contractor either receiving complaints directly or having them referred to them for actioning by Cleanaway. After completion of the appointed Contractor's contract term, Cleanaway will be responsible for managing any complaints.</p> <p>Any complaints received will be treated with respect and will be reported to Cleanaway. Complaints will be received by or directed to designated staff of the appointed Contractor, who will record the complainant details, date, location, and nature of the complaint. The appointed Contractor will have in place procedures for dealing with complaints that will be required to align with a standard for community engagement and complaint response set down in the future construction contract. The appointed Contractor's procedures will include expectations around timely response to complainants and appropriate remediation, respite, or compensation for impacts.</p> <p>Any complaint made to a statutory authority, of which Cleanaway or the appointed Contractor are then informed, will be managed in accordance with the processes set down by that authority to respond to complaints.</p> <p>The Proposal will be located in a precinct of established and future approved extractive industries (quarries) that make the site at 510 Summerhill Road unsuitable for residential development. Siting of the facility in this location provides a long term 'buffer' that reduces risks of harm from noise emissions to sensitive receptors such as residential areas, schools and care facilities. To further reduce the risk of harm, the Proposal has undertaken a detailed noise assessment and sought to implement reasonably practicable mitigation measures. The efficacy of these measures has been confirmed through acoustic modelling and comparison with relevant guideline levels, including the Noise Protocol.</p> <ul style="list-style-type: none"> • Key risks relating to noise and vibration during construction of the WtE facility are related to construction vehicles and the use of plant and equipment during excavations and earthworks, and construction of structures and ancillary structures. The resultant risk of impacts to human health and the environment will be managed through specific measures in the Construction Noise and Vibration Management Plan (CNVMP) and Construction Transport Management Plan (CTMP). Construction vibration can additionally present a key risk to buildings housing sensitive contents, or those located onsite. Mitigation measures such as safe working distances and suitable equipment selection to minimise vibration risks are to be considered based on specific construction activity type and location. • Acoustic modelling for operation of the facility (day-time, evening and night-time periods) concluded that without additional mitigations, there are no expected exceedances of the Noise Protocol limits for surrounding sensitive receptors, with the exception of a habitable building at 475 Summerhill Road. The modelling has confirmed that predicted noise exceedances at 475 Summerhill Road are primarily caused by vehicular movements in and out of the facility. To mitigate these impacts, a noise barrier along the south-east boundary of the Proposal site has been designed and is included in the Proposal. Modelling has confirmed that inclusion of the noise barrier will achieve compliance with Noise Protocol limits at 475 Summerhill Road for

Key theme	Cleanaway response
<p>Circular economy /zero-waste alternatives</p>	<p>day, evening and night periods. A noise barrier would no longer be considered reasonably practicable if this residential dwelling was removed and/or no longer met the definition of a noise sensitive area.</p> <p>The facility will minimise light pollution through limited use of outdoor lighting. Any external lighting of the facility will be designed to improve site safety and to illuminate the key functions of the building and will be suitably buffered to ensure that it does not unreasonably extend beyond the site.</p> <p>The primary objective of the MERC is to support best practice waste management by upholding the waste hierarchy, which recognises recycling and recovery as higher order actions than disposal. The facility will recover energy from residual waste and increase recovery of valuable resources (including ferrous and non-ferrous metals and potential re-use pathways for ash as a construction aggregate), whilst providing environmental and land use planning benefits from diverting waste from landfill in the transition to net zero, and also providing economic opportunities and increasing social awareness of waste management and resource recovery. Waste-to-energy forms part of the solution in the transition to net zero greenhouse gas emissions by avoiding a greater amount of greenhouse gas emissions that they emit. All waste received at the facility will be subject to the MERC Waste Acceptance Protocol, which requires source-separated recyclable materials, FOGO and other non-permitted/unacceptable waste streams such as e-Waste and hazardous waste and focuses the feedstock on waste which would otherwise have been destined for landfill disposal.</p> <p>The MERC will therefore divert residual waste from landfill, supporting the Victorian Government targets for recycling and landfill diversion, responsible waste management and reducing the burden of landfills on the environment and communities. The Proposal will also produce enough energy to power over 70,000 homes and reduce net greenhouse gas emissions by around 230,000t of CO₂-e per year (compared to current practices)², equivalent to taking at least 50,000 petrol-powered passenger cars off the road each year.</p>

² From Table 9: weighted average of Victorian DNSP data, in the Residential Energy Consumption Benchmarks (Australian Energy Regulator, 2020).

3. Conclusion and Ongoing Engagement

The DLA and PPA were placed on joint exhibition on the Engage Victoria website for 55 days from 20 February 2024 to 14 April 2024. The exhibition of the DLA and receipt of submissions was coordinated by the EPA. A total of 831 submissions were received, consisting of 763 public community submissions, and 68 submissions from government agencies (including local councils).

We acknowledge this number of submissions highlights the genuine interest, and in many cases reservations the community has with regards to the MERC facility. This has prompted Cleanaway to provide clarifications to information contained in the DLA and undertake additional technical assessments supported by ongoing consultation with relevant agencies to resolve technical matters.

Cleanaway has undertaken extensive assessment of the key issues such as air quality and odour emissions, greenhouse gas and climate change, noise emissions, human health, surface water, land and groundwater and waste management. Technical specialist reports submitted with the DLA demonstrate that the Proposal can operate safely and within stringent environmental performance standards, including for air quality and human health, through applying the best available techniques as defined in the EU BREF for Waste Incineration (BREF-WI, 2019).

The Proposal acknowledges that while WtE is a reputable and proven approach to waste management in other jurisdictions, it is a relatively new technology for Victoria, and that the community has reservations in a number of areas.

Cleanaway is confident that with the selection of tried and commercially proven technology, consistent with recognised best available techniques, and the application of appropriate controls, potential risks of harm to human health and the environment can be eliminated, or where elimination is not reasonably practicable, mitigated or managed to an acceptable level.

3.1 Ongoing engagement

Cleanaway is committed to continuing its engagement with the community and key stakeholders following lodgement of the DLA and PPA and (if approved) throughout the construction and operational phases of the facility.

Table 8 outlines potential future engagement opportunities. These will be reviewed and adapted as the project progresses.

Table 4: Potential ongoing and future engagement opportunities

Activity	Timing
Attendance at EPA/ DTP led community events	As required
E-newsletters	Ongoing
Enquiries email and phone hotline	Ongoing
Continuous engagement with the Stakeholder Reference Group	Led by SRG members. The group will meet four times a year. Additional sessions/ activities could be organised if the group requests.
Information forums	As required

Activity	Timing
Letterbox drops (for key milestones, i.e. Construction notifications, as required)	Relevant milestones (e.g. construction notifications)
Social media campaigns	Ongoing
Stakeholder project update briefings	Relevant milestones
Website updates	Ongoing

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