Our Ref: D/15/43713

CORANGAMITE SHIRE

EPA Inquiry Secretariat
PO Box 21428
Little Lonsdale Street VIC 8011

Sent via email: info@epa-inquiry.vic.gov.au

Dear Ms Armytage

Re: Submission to the Ministerial Advisory Committee for the Inquiry into the EPA.

Please find attached Corangamite Shire Council's submission to the Ministerial Advisory Committee (MAC) for the Inquiry into the Environment Protection Authority. Council resolved to lodge this submission at the October 27 Ordinary Council meeting and also support the issues contained within the MAV submission.

Corangamite is a large rural Shire of 4200 $km^{2,}$ located in Victoria's south-west and stretches from Skipton in the north to the Southern Ocean in the south. There are 11 rural townships within the Shire, being Camperdown, Port Campbell, Terang, Noorat, Princetown, Derrinallum, Darlington, Lismore, Skipton, Cobden and Timboon.

Council currently operates a regional landfill and composting facility at Naroghid and also manages a closed landfill site at Noorat. The Naroghid facility is identified as a hub of regional significance in the Statewide Waste and Resource Recovery Infrastructure Plan.

Whilst Council appreciates the need for environmental regulation, the current approach being administered by the EPA is not risk based and creates a significant financial burden on the community. The one size fits all approach currently being administered is the most costly system for rural communities and provides limited improvement in environmental protection at many sites. These issues need to be addressed into the future to allow the EPA to provide the most effective and efficient environmental regulation for Victoria.

Corangamite Shire thanks you for considering the matters raised within its submission and would welcome an opportunity to clarify any items with you. Should you require further clarification or would like to discuss our concerns further please contact me on 5593 7100.

Yours sincerely

Andrew Mason
Chief Executive Officer

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Submission to the
Ministerial Advisory Committee for the Inquiry into the EPA

Corangamite Shire welcomes the opportunity to provide a submission to the Ministerial Advisory Committee (MAC) for the Inquiry into the Environment Protection Authority.

Corangamite is a large rural Shire of 4200 km^2 located in Victoria's south-west and stretches from Skipton in the north to the Southern Ocean in the south. There are 11 rural townships within the Shire, being Camperdown, Port Campbell, Terang, Noorat, Princetown, Derrinallum, Darlington, Lismore, Skipton, Cobden and Timboon. The population of Corangamite Shire has remained relatively static in recent times and is not projected to increase into the future. The rural nature of our Shire results in vastly different development pressures when compared to metropolitan areas and those councils which have a major service centre within their boundary.

Corangamite Shire currently operates a regional landfill and composting facility at Naroghid and also manages a closed landfill site at Noorat. The Naroghid facility is identified as a hub of regional significance in the Statewide Waste and Resource Recovery Infrastructure Plan, which is a key document for planning Victoria's waste management future.

While the Corangamite Shire provide this submission for consideration by the MAC, Council's elected members and staff have also participated in a number of the consultation opportunities provided during the public consultation process and have welcomed the opportunity to engage with the MAC at this level and support the issues contained within the MAV submission.

In an effort to assist the MAC to consider the concerns of Corangamite Shire, topics have been grouped around the Terms of Reference with each section supported by recommendations for change that may be implemented to improve the function of the EPA into the future.

1. **The EPA's appropriate role in relation to public health issues, including at least: community concerns such as exposure to asbestos, chemicals and other pollutants; the prevention and management of site contamination, air quality, and water quality in rivers and other waterways;**

Council believes that the future role of the EPA should focus on pollution and environmental issues as the primary objective. The impact on health should be used as one of the measures to establish the thresholds and determine community risk, not drive the application of future programs. This information can then be used by the EPA to establish triggers for acceptable levels of contaminants within the environment, which industry and the community can work towards. If the levels are exceeded and the risk to the environment is sufficient the EPA should act.

It should also be recognised that rural and metropolitan communities are different and therefore have different issues. Regional areas have different growth pressures which results in some areas experiencing declining populations while others have changing demographics. As rural areas contain lower population densities and land uses (which can be considered industrial enterprises) the closest receptor model being applied across the state is not reflective of the true risk.

Rural communities have a right to expect to be represented by the EPA and receive a level of service and support which is currently not being achieved across the south-west. Service levels for rural areas need to improve to meet the needs of communities and determine which issues pose the largest potential environmental impact, and to address issues that the community would like the EPA to regulate.

Councils across Victoria have a legacy of old “tip” sites from communities that are vastly different from those in rural areas today. These sites have been closed for extended periods and in many instances, particularly in rural areas, provide very low to no risk to the environment and surrounding communities. Our communities are often comfortable with the existence of these sites and how they are currently or have been managed.

The EPA is currently implementing a retrospective compliance program for closed landfills. This is a major concern, as most closed sites have no ability to create income. The retrospective application of new standards creates a direct burden on the community as financial costs are passed to rate payers. The cost of meeting the increased demands of the EPA include both initial upfront costs to undertake new modelling and establish infrastructure for the higher monitoring standard, but then also the recurrent cost of increased monitoring programs. For the Noorat Closed Landfill site, which has been closed and rehabilitated for 15 years and not indicating a change in risk to the environment or community, the changes are expected to cost the community an additional $500,000 (calculated over a 10 year period). The retrospective nature of the application of current standards does not match the risk for specific sites and appears to be a blanket application of rules across the state. This also provides concern for Council as the ability to plan for closure of the still operational site becomes unknown due to EPA inconsistency of future requirements.

Regulation being applied to closed and existing sites needs to ensure the cost to the community is not disproportionate when compared to the benefits being achieved for the environment. The risk and potential pollution for sites with retrospective application should be clear and defined by the EPA to justify retrospective application of increased standards and long term costs of further monitoring. Sites that have been rehabilitated to the standard required at the time of closure and are not specifically creating an identifiable pollution issue should be allowed to remain at the previously required monitoring levels.

Council's concerns for the EPA's current approach to closed landfills includes:

- Increased management of sites when the risk profile has not changed since rehabilitation.
- The application of controls retrospectively, even when rehabilitation has been undertaken to previous EPA requirements.
- Requirements for increased ongoing monitoring - seeking to introduce changes to monitoring regimes without evidence of risk or complaint.
- Increased costs to administer new standards at closed sites that no longer have the ability to attract income.

Council believes these issues need to be reviewed by the EPA with consideration to overall risk for the environment and the application of regulation to closed facilities.

Recommendations:

In the future the EPA needs to apply a regulatory role which considers all factors relating to an issue and not just the potential health or environmental impacts and issues. There needs to be a multi-tiered risk based process applied to EPA considerations which will allow the most suitable management approach to be chosen based on environmental risk and financial cost to the community.

EPA officers should be located within rural areas of Victoria to ensure a consistent approach is applied to all issues and complaints. Council recognise the population differences from rural and metropolitan areas, however there is still a requirement for the EPA to operate and be accessible to rural communities.

The EPA develop a new system that considers the impact of applying environmental regulation retrospectively, to ensure regulation is implemented with consideration of a range of other factors including community expectations (Rural vs Metropolitan).

2. The Victorian community's and industry's expectations of the EPA as its environmental regulator;

Corangamite Shire believes that the current culture of the EPA does not provide the correct environment to allow the organisation to be the best EPA available to the Victorian community. Council has experienced this cultural issue as part of its dealings with staff in an attempt to resolve issues and ensure that risks to the community and environment are understood. Issues that reinforce this culture and need to be addressed include:

- The EPA struggles to balance when they are a partner with Local Government and when it is a regulator.
- Local Government has difficulty contacting staff to report or follow up issues. EPA contact is currently made through the general public EPA number.
- There is a lack of consultation with Local Government (for example issues in relation to enforcement activities and providing further evidence).
- EPA approach to regulation - Often based on one size fits all, not based on risk. Extremely large sites require a higher standard than smaller rural sites due to risk.

This should be acknowledged and a solution found that matches the risk of the site and volumes of waste.

- The risk approach applied by the EPA only focusses on industries and does not drill down to specific sites.
- There is a significant difference between rural and metropolitan areas, community expectations and the issues faced. This is not reflected in the approach of the EPA.
- The EPA has developed a risk aversion process where third parties provide audits and approvals based on a single standard regardless of risk. Review and approval should be the role of the EPA. For example:
    - Landfill 53V audits and construction processes.
    - Septic tank approvals process which will no longer be provided by EPA.
- Reluctance to investigate issues with state level infrastructure (gas plant investigation and monitoring of noise issues).
- Insufficient guidance on applications and investigation of new waste management technologies etc.
- Organisational requirements, enforcement and regulation should consider the cost to the community as part of the risk determination and remedial action for sites.
- Currently there are inconsistent approaches to enforcement with some areas and entities that are heavily controlled while other sites and those on crown land are not.
- Sustainability Victoria and EPA priorities do not align. For example SV focus on diverting organics from landfill, EPA composting guidelines means it is increasingly difficult and costly to treat food organics. Some councils have opted for green organics only collections, with food organics going to landfill.
- Difficult to access expertise in EPA- no communication about who we can talk to for different issues. Going through the EPA hotline does not work (calls are not returned or the person calling back cannot help).
- Difficulty obtaining timely responses. For instance licence amendment for cell 13 took six weeks even though EPA were notified prior to lodgement that the site was short on airspace and needed approval as soon as possible.
- Very little education for and about EPA guidelines. Guidelines are open for interpretation and as operators do not know how they will be applied by the EPA, often operators do not know they are non-compliant until enforcement action is undertaken.

In many instances the discretion of EPA officers has been withdrawn from providing advice and approvals for daily operations undertaken by licence holders and replaced by deferred decision making. The process involves auditors and third party approvals who are required to review and approve significant bodies of work relating to, in many cases, regular requirements for site operation. This creates another cost to licence holders and should be the role of the EPA, not third parties, which have the risk transferred to their organisation if they approve something different from the EPA guidelines.

The EPA should continue to provide the registration and approval system for Domestic Wastewater Management Systems (up to 5,000l). The existing approval system is being transitioned to a reliance on the Australian Standard and Local Government to approve systems and determine compliance. The result of the proposed change will be greater

uncertainty for the community and manufacturers as each council individually applies different processes to achieve approval for installations.

Council's expectation is that the EPA extends the risk based approach beyond industry level assessments and ensures they are used for each individual site. This will allow low risk sites to continue to operate or remain closed with minimal resource input into the future.

Recommendations:

That the culture of the EPA is developed to work with key stakeholders and licence holders towards agreed and common goals. This should be supported by client managers which are the key contact for stakeholders and licence holders and available for support when required. This structure will allow EPA staff to understand the pressures on the licence holders and how best they can achieve compliance.

EPA officers need to be empowered to have the capacity to make decisions which allow smooth application of advice and support for licence holders in relation to site operations.

The EPA needs to work with industries that are undertaking research and investigation to develop better practices or alternative solutions to current issues. This will allow research to better understand what will be expected when the approval process is undertaken and the likelihood of achieving approval.

The EPA should continue to provide a registration and approval system for Domestic Wastewater Management Systems (up to 5,000l). The existing system ensures all systems and consumers across the state are meeting the same standards and the impact of these systems within the community can be understood.

3. The EPA's appropriate role in protecting the environment;

The EPA has an important role to play in protecting the environment, however this should not be considered in isolation from other community factors such as location, demographics and financial burden.

As the Corangamite Shire operate a regional landfill and composting facility it has a unique opportunity to be involved with the EPA as Local Government and as a licence holder achieving compliance for a community asset. It is believed that the current regulatory process and methods being used by the EPA are not appropriate and will need to be improved into the future in an effort to provide the correct platform for the EPA to protect the environment in the most efficient manner.

There are no transitional provisions when standards change and consideration of risk prior to their application. This needs to be considered for all changes in standards, especially when they impact the cost of providing services and entire operations of facilities. Changes should be scheduled over a number of years with clear expectations established to support the transition and consideration of how this impacts rural communities as opposed to metropolitan communities. The introduction of the Landfill BPEM and significantly higher construction standards has increased landfill cell construction costs for Naroghid Landfill from approximately $250,000 per cell to over $2.5m. These costs are recurrent as the landfill continues to provide a service to our community and therefore passed on through significantly higher and unfair gate prices for our rural community.

Issues that reinforce Council's concerns with the EPA's current systems and requirements, particularly for landfills and composting facilities, include the:

- Complexity of the construction process for licence holders and the impacts of changing requirements and processes. This creates increased costs to the community, with often limited increase in environmental benefit.
- Inconsistent interpretation of requirements within the BEPM - Officer expectations exceed BEPM (e.g. liner integrity surveys). There is no ability to question or seek review of the officer's determination even when the requirements from one approval to the next are significantly different.
- Onerous audit requirements and auditors that are risk averse. This increases costs and decreases the ability to improve processes.
- Impacts of auditing process are excessive (delays, costs). There have been instances where significant amounts of waste have been stockpiled while the paperwork and approval process is undertaken. This has resulted in waste above contours and waste being moved into cells once approved that should have been deposited into the cell initially.
- Significant financial costs to achieve compliance with increasing standards and costs to rural communities. These costs have typically been reflected in the lower risk construction requirements and landfill levy differential between metropolitan and rural areas. These factors have now been removed which does not support rural communities.

Recommendations:

The EPA review and develop systems that provide the ability for officers to approve and adjust requirements in a sensible and cost effective manner for licence holders. This could include approval of new landfill cells for use outside the audit process, if the situation can be justified and the risk of not using the cell outweighs the risks of using the new cell.

A multi-tiered risk based assessment process should be developed as part of the EPA's process for implementing and changing guidelines, standards and expectations for license holders and previously approved sites. This system needs to consider current and potential risks, financial impacts, community concern and remedial actions required if something is creating an environmental issue. The new process for adopting new guidelines should also include transitional periods and an independent third party review process for the proposed action prior to it being implemented by the EPA.

EPA standards should apply a best practice solution based on the risk level of each sites, with EPA staff trained to understand the varying requirements and the need to have different levels of controls for individual sites and the level of risk.

An internal review process should be available for licence holders where EPA staff have required design features which are not in alignment with the site based risk level and EPA guidance documents.

The auditor process must be reviewed to reduce the financial and resource burden that has moved to local government and licence holders.

4. The ability of the EPA to ensure that the principle of environmental justice is adhered to, the environment is protected for the benefit of the community, and members of the community can be meaningfully involved in, and access fair treatment through, environmental regulation;

Council believes that the principle of environmental justice varies depending on the proximity of the community to the issue. The wider community still require access to waste disposal facilities and industry which should be supported by allocating areas for these types of use and protecting buffer distances. This will allow the facilities to operate without threat of encroachment, targeting by lobby groups and complaints from people who do not want certain types of activity within the community. The EPA needs to have the ability to identify unfounded and vexatious complaints and protect licence holders and industry from unjustified attack.

Communities that have an issue with a facility or pollution event often become frustrated with the variety of guidelines and other enforceable documents which are only loosely linked to the Act. This frustration is shared by operators who try to work within legislative frameworks that refer to guidelines and publications which may or may not be enforceable.

The financial and technical practicality of achieving some EPA guidelines is questionable. This is reflected in the composting guidelines that have established buffer requirements that would be difficult to achieve within most of Victoria. The EPA regulatory approach can also at times directly contradict efforts and programs from Sustainability Victoria. This conflicting approach is evident with Sustainability Victoria's push to remove organics from landfills while the EPA develops restrictive and financially onerous composting guidelines.

Further, the expectations of the EPA often do not align to community expectations. Some communities may have a high level of acceptance for certain activities in rural areas. In these instances alternative tools should be available to the EPA beyond regulation to help educate and support communities and industry to improve practice.

Recommendations:

The EPA and State Government protect existing licensed and operating facilities by establishing development controls within designated buffer areas. This should be supported by refining existing requirements to ensure practical buffer distances are established in planning schemes.

Environmental justice systems need to be developed in a manner that has the ability to identify unfounded complaints and protect facilities that are operating correctly and in accordance with their licence.

The EPA need to be supported in establishing a system that allows the organisation to review its regulatory role to ensure it aligns with wider community expectations, and deal with ongoing issues for specific sites e.g. state infrastructure noise investigations.

Communities should be considered as a key stakeholder in the operation of licenced facilities, while also recognising that prejudices can be developed against sites which are otherwise acceptable and operating correctly.

5. The ability of the EPA's current governance structures and funding arrangements to enable it to effectively and efficiently discharge its powers, perform its duties and implement its required functions;

The EPA has recently moved to a significantly different model of operation where they are no longer a partner with licence holders. The EPA now uses regulation as the sole motivational tool for achieving environmental protection. The EPA has also removed risk from the organisation and now fully relies on external parties and auditors to provide advice to licence holders and approve landfill designs. This change has shifted considerable cost to licence holders and communities but no alteration to the EPA financial delivery mechanism. The EPA needs to review and change its culture and approach to achieving compliance within Victoria and start working with licence holders.

The levy, which is collected with gate fees from landfills across Victoria, is held in the Sustainability Fund that supports organisations such as the EPA, Sustainability Victoria and Resource Recovery Groups. Financial statements for the year ending 30 June 2014 show there is $311 million remaining in the fund after only $41 million was distributed to projects across Victoria. A key issue for Corangamite Shire is the extent to which the landfill levy returns value to the areas from which it is collected. Corangamite Shire faces significant cost increases to operate its regional landfill and requires additional funding to invest in new resource recovery technologies, closed landfill rehabilitation and on-going maintenance. Council has developed a fact sheet (attached) in relation to landfill levies which highlights its significant increase over time and the lack of investment back into resource recovery projects and support for landfills in rural areas.

There is opportunity for the EPA to use more of the landfill levy for the EPA’s operation, if it was to move back to a supporting agency that is focussed on the best long term outcomes for communities. Strategic investment of the landfill levy should be the main priority for the fund and provide waste management technologies and infrastructure that reduces risk for our communities and improves long term management across Victoria. Without increased investment of the landfill levy and support from the EPA to implement new technologies licence holders will struggle to improve practice beyond meeting the EPA’s ever increasing regulatory approach to environmental outcomes.

There is also a growing issue regarding the loss of disparity between the Metropolitan and Rural landfill levy for industrial waste. This increases waste movement away from smaller rural sites and across state borders.

The key issues relating to landfill levy for Corangamite Shire include:

- Insufficient return of landfill levee to regions.
- Minimal investment and support for waste treatment and new technologies. No research and development consideration.
- The industrial levy rate between metropolitan and rural landfills has reduced and now provides opportunities for rural waste to spill into metropolitan and interstate areas due to economies of scale.

Recommendations:

The distribution of the landfill levy must be significantly increased, with a focus applied to new large scale resource recovery and waste management facilities across Victoria. This will require significant investment and will create market forces that currently do not exist in

rural areas. The levy also needs to support closed landfills that have not been in operation for a number of years and now require rehabilitation.

The differential between metropolitan and rural levies must be reviewed to ensure regional landfills and hubs identified in the SWRRIP are supported and waste does not creep into the metropolitan areas and interstate, as the community attempt to avoid disposal costs and levy.

EPA governance structures should be reviewed to allow greater representation and staffing in rural areas. This should include funding models and polluter pays programs that can support the changes required to allow the EPA delivery model to be adjusted to focus on partnerships.

6. The scope and adequacy of the EPA's statutory powers, and the effectiveness and efficiency of the suite of tools available to and utilised by the EPA, in enabling protection of the Victorian community and the environment, particularly in light of recent, new and emerging risks and issues;

The EPA has a considerable workload and diversity of issues under its control, which continues to increase. It is currently promoted that the EPA has adopted a risk based approach to inspections (focusing on activities most at risk of doing harm to human health). The risk based approach appears to be implemented at a high level and only considers risk at the industry level. This needs to be reviewed and implemented as a site specific approach to regulation and partnerships. The current approach results in over regulation and excessive standards at low risk and well planned facilities. If a truly risk based approach was developed the workload of the EPA would significantly reduce.

The powers and tools currently being used by the EPA have been developed with a single focus and do not consider the entire range of issues and technologies available to industry and Local Government. This prescriptive one size fits all approach restricts licence holders and does not reflect risk levels at specific sites.

The current approvals system allows applicants to propose alternative measures, however when this option is investigated it becomes evident that the cost of developing the evidence to obtain approval for an alternative measure is cost prohibitive and essentially not available to rural and smaller licence holders.

The EPA needs to have greater technical and scientific expertise as well as having appropriate governance arrangements to ensure accountability to the responsible Minister.

The EPA has developed a wide range of guidelines and supporting information which have become enforceable documents for the EPA. Comment is typically sought on the documents prior to development, but very few, if any, changes are made to the documents after the stakeholder comment process. These guidelines and documents have been developed with a single focus of environmental impact and should consider other factors such as cost to the community. There is no review process for these documents or ministerial approval prior to them becoming enforceable. These documents should be subject to a community impact assessment to ensure they achieve the expectations of the community.

Recommendations:

The EPA should be resourced to develop risk based systems that are capable of applying an appropriate operational standard to protect the environment and community while also considering financial impact. This system must include the re-development of guidelines and standards which currently appear to be developed with a single focus. This could be achieved through a community/financial impact analysis being applied to the risk model and then an independent review process prior to approval.

The EPA needs to have greater technical and scientific expertise and authority for staff to provide support to licence holders to overcome issues and achieve compliance.

Ministerial accountability of the EPA needs to be increased to ensure that the EPA is achieving outcomes in the best interest of the wider community and if issues arise that are outside the existing processes they can be dealt with.

The EPA is the Environmental Protection Agency and should not have the ability to take a risk and cost shifting approach to regulation. The use of external auditors for all works and approvals needs to stop and the responsibility for approvals and review be diverted back to appropriately qualified staff within the EPA.

Attached Document: Landfill Levy Fact Sheet

Returning Landfill Levy for Infrastructure Investment and Rehabilitation of Closed Landfills

CORANGAMITE SHIRE

Introduction

The State Government collected $1.2 million in landfill levy from the Corangamite Regional Landfill during 2013-2014. It is estimated $1.3 million will be collected in 2014-2015.

The levy, which is collected with gate fees from landfills across Victoria, is held in the Sustainability Fund that supports organisations such as the EPA, Sustainability Victoria and Resource Recovery Groups. Financial statements for the year ending 30 June 2014 show there is $311 million remaining in the fund after only $41 million was distributed to projects across Victoria.

A key issue is the extent to which the landfill levy returns value to the areas from which it is collected. Corangamite Shire faces significant cost increases to operate its regional landfill and needs additional funding to invest in new resource recovery technologies, closed landfill rehabilitation and on-going maintenance.

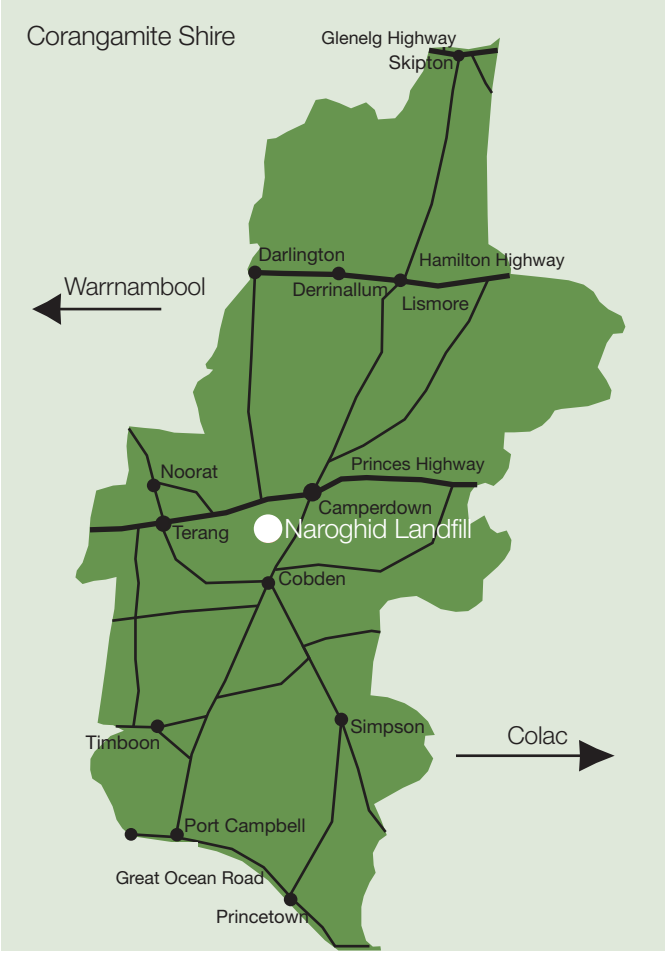
The landfill levy represents a real and significant cost to Corangamite Shire and our residents, for which we receive little in return. We call on the State Government to increase distribution of the landfill levy to support greater investment in large scale local projects, to improve resource recovery at Regional Facilities and investment to assist in managing and rehabilitating closed landfills..

About Corangamite Regional Landfill and the landfill levy

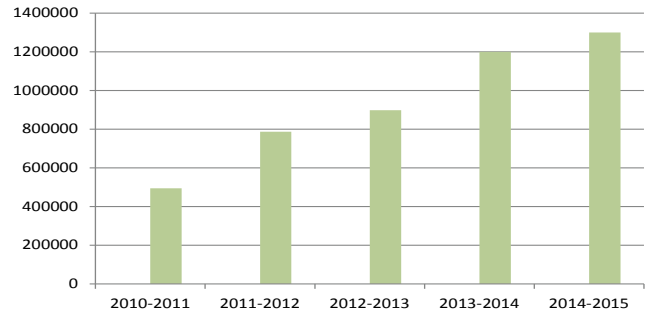
Corangamite Regional Landfill has been identified as a hub of regional significance in the Statewide Waste and Resource Recovery Infrastructure Plan. The landfill currently services Corangamite Shire and receives waste from commercial customers as well as kerbside collections from Moyne, Golden Plains, Colac Otway Shires and the City of Warrnambool. The landfill receives approximately 34,000 tonnes of waste annually.

In 2010, the State Government announced it was increasing the levy on all waste going into landfill across the state. Councils collect this levy from ratepayers through garbage charges for kerbside collection services and gate fees to dispose of waste at landfills.

The intention of the levy, held in the Sustainability Fund, was to support the EPA, Sustainability Victoria and Resource Recovery Groups, as well as investing back to the waste industry to improve local landfills and communities contributing to the fund.



Rise of the Naroghid Landfill Levy



It is essential that significant investment is now returned to sites like Naroghid to ensure they continue to provide improved waste management into the future. In Corangamite Shire 24% of the cost per tonne to dispose of waste at the landfill is attributed to the levy.

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Issues

In the past five years, Corangamite Shire has contributed $4.48 million to the Sustainability Fund through the landfill levy and received $532,000 in direct grants, representing 12% return of levy back to the landfill of what Council have collected from residents and landfill users on behalf of the State Government.

Financial statements for the Sustainability Fund show that there was $311 million in the fund in the year ending 30 June 2014. It is important to recognise that the landfill levy provides important funding for the Barwon South West Waste and Resource Recovery Group. In 2013-2014 the group received approximately $300,000.

Corangamite Shire has received four direct grants from the Sustainability Fund over the past five years. These were distributed at the discretion of the Minister for Environment via Sustainability Victoria.

- $250,000 to help achieve compliance with the Best Practice Environmental Management Guidelines
- $60,000 to improve organics waste processing
- $200,000 to assist with a business case for innovation at the regional landfill
- $22,000 for upgrades to a transfer station

While these grants have helped Council to make small steps towards improving resource recovery, there has been little support towards investment in large scale capital projects to improve resource recovery at Regional Facilities and investment to assist in managing and rehabilitating closed landfills.

What we need

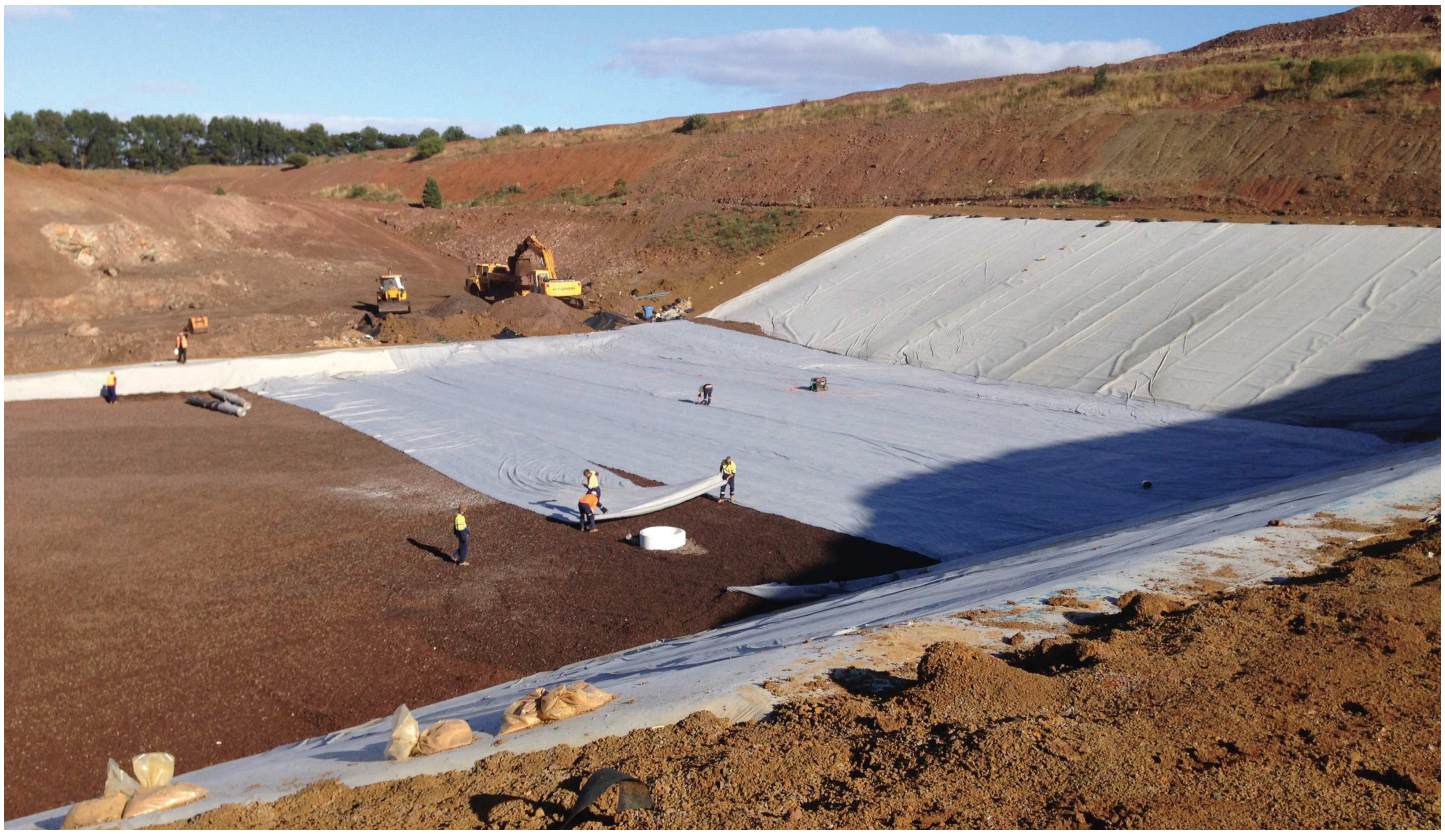
While we have been able to secure minor support for projects such as composting improvements, a compost turner, horizontal grinder and feasibility study, these projects remain under-invested.

Councils who operate landfills need access to dollars to improve and innovate. There have been few funding programs to implement large scale capital projects that will significantly improve management of the landfill facility or provide alternative recovery and recycling opportunities. As a regional facility, this investment is difficult to achieve and significant support is required across the state to ensure new technologies are able to be developed.

Another major challenge facing many Councils is the very significant costs associated with the rehabilitation and management of closed landfills. Because these landfills are closed (in some cases for many years) there is no income stream to offset the costs of investigation and rehabilitation.

The Sustainability Fund holds a significant reserve of money which is collected on behalf of the State Government by Local Government and landfill operators. We want more of the levy to return value to facilities such as the Corangamite Regional Landfill which needs large scale investment to improve resource recovery and for Councils to rehabilitate and manage closed landfill sites.

Don't let Victoria fall further behind other states when it comes to investment in large scale capital projects to improve resource recovery at Regional Facilities and investment to assist in managing and rehabilitating closed landfills. The solution is sitting right in front of us, in the Sustainability Fund.



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