

APPENDIX B: Response to Capire's s236 Conference of Interested Persons Report

Thank you for responding to Prospect Hill International's Energy from Waste Works Approval Application. Please continue to participate in ongoing communications regarding this project as PHI remains committed to engagement with local community members and organisations into the future.

In summary, PHI's proposed Lara EfW facility will provide a range of significant benefits:

- The project will process waste that would otherwise go to landfill. The diversion of non-hazardous residual waste from landfill to higher order use (recovery of energy) as per the EPA waste hierarchy has great environmental benefits. Utilising this waste to recover its energy, coupled with the recycling of metals from the bottom ash stream and the future potential to direct the ash material for beneficial re-use as aggregate replacement, is a positive environmental outcome – the project has the potential for 100% diversion of residual waste from landfill.
- Avoiding residual waste from being disposed at landfills reduces the quantity of methane gas produced and has been calculated to have a major reduction in greenhouse gas emissions. The project will have a net reduction in greenhouse gas emissions of over 300,000 tonnes of CO_{2-e} per annum – that's similar to removing 60,000 cars from our roads.
- Leading European countries with the highest levels of recycling also rely heavily on energy from waste solutions to increase the diversion of non-recyclable municipal waste from landfill. These countries utilise recycling and energy from waste as complementary solutions.
- The project will provide the generation of baseload electricity and increase energy security. The project will also reduce the reliance of the electricity grid on fossil fuel generated electricity.
- PHI's Lara EfW project will contribute to the community by creating hundreds of jobs during the construction of the plant and around 30 ongoing roles during its operation. It is anticipated that people for these jobs will be recruited from the Lara/Geelong area.
- The Lara EfW facility would utilise proven, European best practice technology and be a leader in thermal waste management technology in Australia.

Concerns	Number who prioritised this concern	Desired action	Residual question	PHI response	Reference
Capire Report, section 2.1 Location					
Wrong location, health hazard. Far too close to residential (future and current). Even though it's in an industrial area - this site is closest to the residential area	7	New location. Appropriate buffer to future residential areas	<ul style="list-style-type: none"> • How can you control what toxic things are coming out given the uncertainty of what is going in? • How effective is the filtration system? • What monitoring of toxins will there be? 	<p>There are many factors that influence the selection of a suitable site for an energy from waste plant. During the feasibility stage of this project we assessed several potential project sites using the following key criteria:</p> <ul style="list-style-type: none"> • zoning of the land, • road access, • availability of services, • site readiness • potential social and environmental impacts. <p>The selected project site in Lara scored well on all criteria. The key factors that make the Lara site suitable for this project are:</p> <ul style="list-style-type: none"> • The site is located within the Geelong Ring Road Employment Precinct (GREP). The GREP is Geelong's largest designated industrial development precinct and includes over 500 hectares of land zoned for heavy industrial purposes. • The site is located within an industrial planning zone (Industrial 2 Zone or "IN2Z") which is designated for large industrial purposes like an energy from waste plant. Under the planning scheme, one of the purposes of the IN2Z is "To provide for manufacturing industry, the storage and distribution of goods and associated facilities". • Geelong and the surrounding region have suffered from the closure of large manufacturing plants over recent years. Prospect Hill International sees this project as an opportunity to bring back some of those skilled jobs to the area and hopes to employ people who may have been impacted by skilled job losses in recent years. • The site is located close to potential waste sources, including Geelong, the Surf Coast and Bellarine as well as the growing region of western Melbourne. • The site has good transport links, being close to the Princes Freeway and Geelong Bypass. • Trucks that transport waste to the plant will be able to access the site through roads in the industrial zone and not have to travel on residential streets. <p>Experience with these types of plants around the world shows that they have very low amenity impacts to surrounding communities. There are many examples of EfW plants being located within tens or hundreds of metres of large residential populations (tens of thousands of people), such as London, Paris, Tokyo, Zurich and Vienna. Modern energy from waste plants include sophisticated measures to minimise impacts on surrounding communities, like noise reduction and sound proofing design elements, state-of-the-art air emissions controls and advanced odour controls.</p>	<p>Please refer to the Prospect Hill International website for examples of EfW plants located very close to large residential areas: https://prospecthill.com.au/</p> <p>See Appendix D Air Quality Impact Assessment See Appendix F Health Impact Assessment</p>

				<p>We are committed to managing emissions from our energy from waste plant to reduce potential impacts to the community. The air pollution control (APC) system is a sophisticated system that will cover approximately one third of the plant's footprint and accounts for a large proportion of the plant's construction and operational costs.</p> <p>The APC system is designed to utilise the latest best practice technology and will include bag filters, chemical addition (e.g. bicarbonate, activated carbon or lime) and reactors to treat the emissions prior to being exhausted from the chimney (or stack).</p> <p>The important aspect to note is that the APC system will be designed so that the stack emissions comply with the European Union emissions limits (EU IED - Industrial Emissions Directive) and Environment Protection Authority Victoria limits. The APC system will be fitted with a continuous emissions monitoring system (CEMS) which will monitor the performance of the control system and the emissions from the plant. The CEMS will provide constant monitoring of a wide range of emissions to demonstrate compliance with EU IED and EPA limits and will also identify reductions in performance and alert the operators of any issues – before emissions reach limits.</p> <p>Regular calibration checks on equipment and national association of testing authorities (NATA) accredited tests will also occur on the CEMS, and an operation and maintenance program will provide the framework required to undertake regular maintenance on the plant.</p> <p>A Health Impact Assessment (HIA) was completed as part of the Works Approval Application. The HIA concluded that:</p> <ul style="list-style-type: none"> • There are no acute risk issues of concern for health issues related to air quality and inhalation, deposition or multiple pathway exposures • Chronic and incremental carcinogenic risks are negligible and essentially representative of zero risk. <p>Proper operation and maintenance, and monitoring of the pollution control/flue gas equipment are measures that will be implemented to mitigate any potential negative impacts.</p>	
Noise from operation (forklifts, trucks) → evidence that this type of operation will cause an issue (Kocke Brothers). → Night-time noise issue	1	Could be underground or in some form of bunker	-	<p>A Noise Impact Assessment was conducted for the project, including the determination of noise limits (in accordance with EPA Victoria legislation and regulations) and environmental noise modelling of the proposed EfW plant. The assessment concluded that the EfW plant will meet all of the requisite noise limits (Recommended Maximum Noise Levels – RMNLS) under neutral and adverse (worst case for noise propagation) meteorological conditions.</p> <p>Nearly all of the noise generating activities (e.g. unloading waste, machinery noise) will take place within enclosed buildings. The acoustic controls in the Works Approval Application have been specified as the minimum controls necessary to meet the relevant EPA noise limits (RMNLS). During the detailed design, detailed acoustic specifications will be noted in the construction specifications in order to meet the noise limits.</p>	See Appendix E Noise Impact Assessment
Locations linked to all other issues (health, noise, traffic)	-	-	-	PHI is not sure what the concern is – PHI refers to the first concern in this theme (2 rows above).	
No biodiversity study done - how could it effect flora/fauna	-	-	-	<p>With regard to biodiversity at the proposed EfW site, a Flora and Fauna Assessment was conducted of the site and found that the site did not contain any flora and fauna values. It was found that the site had been cleared in the past for other activities (farming) and no ecological values remain.</p> <p>With regard to potential flora and fauna impacts of emissions from the operating plant, the concentration of bioaccumulative pollutants in animals and plants was calculated and concluded to be of negligible risk.</p>	See Appendix H Flora and Fauna Assessment See Appendix F Health Impact Assessment
Not close to a substation → will lose power due to this inefficiency	-	New locations No new powerlines/ high tension cables	<ul style="list-style-type: none"> • How will power efficiently get back to the grid so it can be used by households? • Can the facility work without high tension cables/powerlines? 	To export electricity from the EfW plant to the grid will require an electricity connection utilising powerlines. This is likely to be in the form of 11kV or 22kV power lines, which could be strung from the existing powerlines in the area (e.g. along McManus Rd or Production Way). Discussions will be held with Powercor during the detailed design phase to confirm export requirements and associated infrastructure. If new powerlines are required, the requisite assessments will be conducted at that stage and any requisite approvals will be applied for at that time.	
Light emissions - night-time	1	New location	<ul style="list-style-type: none"> • Is anything planning to mitigate this impact (light emissions)? 	The facility would be designed to mitigate the potential for light pollution, meeting Australian Standard AS/NZS4282:2019 – Control of the obtrusive effects of outdoor lighting. Lighting details will be finalised during the detailed design phase of the project in accordance with DELWP planning requirements.	

Assessment of this location	-	Disclose report/assessment	<ul style="list-style-type: none"> • What alternative locations were considered? • Why was this site chosen? • What criteria was used? 	<p>There are many factors that influence the selection of a suitable site for an energy from waste plant. During the feasibility stage of this project we assessed several potential project sites using the following key criteria:</p> <ul style="list-style-type: none"> • zoning of the land, • road access, • availability of services, • site readiness • potential social and environmental impacts. <p>The selected project site in Lara scored well on all criteria. The key factors that make the Lara site suitable for this project are:</p> <ul style="list-style-type: none"> • The site is located within the Geelong Ring Road Employment Precinct (GREP). The GREP is Geelong's largest designated industrial development precinct and includes over 500 hectares of land zoned for heavy industrial purposes. • The site is located within an industrial planning zone (Industrial 2 Zone or "IN2Z") which is designated for large industrial purposes like an energy from waste plant. Under the planning scheme, one of the purposes of the IN2Z is "To provide for manufacturing industry, the storage and distribution of goods and associated facilities". • Geelong and the surrounding region have suffered from the closure of large manufacturing plants over recent years. Prospect Hill International sees this project as an opportunity to bring back some of those skilled jobs to the area and hopes to employ people who may have been impacted by skilled job losses in recent years. • The site is located close to potential waste sources, including Geelong, the Surf Coast and Bellarine as well as the growing region of western Melbourne. • The site has good transport links, being close to the Princes Freeway and Geelong Bypass. • Trucks that transport waste to the plant will be able to access the site through roads in the industrial zone and not have to travel on residential streets. <p>PHI is currently producing a report that details the business plan and other site locations that were assessed for suitability and will publish the report on our website soon.</p>	
Visual impact of 80 metre (~28 storey) high chimney of the immediate area & from the You Yangs	1	-	<ul style="list-style-type: none"> • Can the design be ameliorated to reduce visual impact / dominance? 	<p>A Landscape and Visual Impact Assessment was conducted for the project. The assessment concluded that these types of planning zones (Industrial 2 Zone) are not considered as being visually sensitive. As the Project is immediately surrounded by cleared farmland and industrial areas, most views toward the site are not considered to be visually sensitive as the landscape is already highly disturbed. Some views, like those close to residential areas and public parks/reserves, may be more visually sensitive. Views are varied, with topography and existing screening/vegetation being the main determinant of whether or not a residence or reserve affords a clear view towards the Project site. Views of the Project from recreational reserves within the study area were assessed to be Low.</p> <p>The project site is subject to the Design Development Overlay (Schedule 18 – Geelong Ring Road Employment Precinct) DDO18. This DDO18 facilitates developments in the IN2Z to provide a high level of amenity for workers and visitors to the estate and to contribute to the amenity of the GREP. The EfW plant has been designed with soft and smooth architectural features to provide an aesthetically pleasing form for people and to also adhere to DDO18.</p> <p>In addition, the project will have numerous mitigation measures to ameliorate visual impact from surrounding sensitive areas, primarily from applying different materials and colours to assist in breaking up the bulk of the built form. The proposed building form is similar to that of an indoor sporting complex such as a basketball or gymnasium centre. Thus the design of the facility can transition the appearance of the industrial zone (where there are no restrictions of height, scale or built form – subject to DDO18) with the surrounding rural residential zone. It will have a more modern and muted appearance compared to the nearby Elgas facility and other buildings/facilities that have been developed in the IN2Z in the past.</p> <p>The highest feature of the facility will be the exhaust stack, which will be 80 metres tall. This is similar to other industrial stacks in proximity to the project, such as the Viva refinery and Incitec Pivot plant which have stacks of around 70-80 metres.</p> <p>The assessment also assessed potential visual impacts related to the You Yangs. The You Yangs Regional Park is a dominant landscape feature within the broader region. The peak of the landform provides panoramic views of Greater Geelong, including views of the GREP area through breaks in vegetation. Views from the peak already overlook a highly disturbed landscape, including other industrial infrastructure such as the Viva Refinery, Corio port and 220kV transmission line. As a result, the predicted visual impact from the Project on this site has been assessed</p>	

				to be Low-Negligible.	
Capire Report, section 2.2 Transitioning away from waste, waste policy					
Waste to Energy discourages recycling Not consistent with state policy on recycling	3	Business case – be public as per Department of Treasury and Finance guidance Pro-forma contract to be public	<ul style="list-style-type: none"> Who are the customers? What are the customers paying? 	<p>A business case as per the Department of Treasury and Finance (DTF) guidance is only required for public/government projects funded, delivered or overseen by government departments or agencies. PHI's EfW project is privately funded and for private sector projects using private funding it is extremely rare for a business plan/case to be released publicly. This is because the business plan/case contains commercially sensitive information that can be used by competitors to gain undue advantage. It would be like going to a house auction and telling everyone what your highest bid would be.</p> <p>PHI is aware of the waste stockpile issue at 300-400 Broderick Rd, where the operator of the site abandoned almost 300,000 m³ of waste which has been left to EPA Victoria to manage and clean up. As a result of this concern, PHI is considering whether to release a business plan or business case to the public. PHI will provide further details in the next few weeks.</p>	
Plant is far too big! Not compatible with short - medium - long term future	1	Clarify where the waste is coming From	-	<p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc.</p> <p>With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting residual waste that would otherwise go to landfill.</p> <p>Diverting this residual waste to an Energy from Waste facility provides an opportunity to recover value in the form of energy, which is a part of the Recycling Victoria strategy, and is preferred over containment or disposal (landfills). Modelling shows that with sufficient infrastructure, 45-50% of the waste currently going to landfill could be diverted for reuse, using Waste to Energy technology.</p>	See Section 1.6 and 1.7 of the Works Approval Application report
State Government cap of 1 million tonnes of waste to energy	1	Clarify State Government plans for maximum of 1 million tonnes	• How does Prospect Hill fit in with overall provision?	The EfW projects that have already been granted approvals will not fall into the government's cap of 1,000,000 tonnes per annum. Thus, there are effectively no projects that currently contribute to the 1,000,000 tpa cap.	https://www.mav.asn.au/__data/assets/pdf_file/0003/27966/MAV-Submission-Waste-to-Energy-Framework.pdf
Not circular Not green Not innovative	2	-	-	<p>PHI advocates for a zero waste future. However, Victoria is many years (most likely decades) away from realising zero waste and a fully circular economy. PHI views energy from waste as a transitional technology to help improve the environment while moving towards zero waste.</p> <p>Despite the ambitions of governments and councils for a zero waste society, it is clear that zero waste in Australia will not occur in the near future (10-20 years). This is based on the global experience where numerous jurisdictions have stated ambitions for zero waste over the past 2-3 decades, yet no jurisdiction is close to achieving zero waste. The best performing jurisdictions in the world on waste management, reuse and recycling (Sweden, Denmark, Finland, Netherlands), still produce 43-57% residual waste – Germany is the stand-out producing 'only' 33% residual waste. Based on the European experience over many decades and the comparative superiority in existing reuse/recycling programs, it is unrealistic to believe that Victoria can surpass EU jurisdictions and achieve zero waste within the next 1-2 decades.</p> <p>The current recycling rate in Victoria is approximately 45% and the amount of residual waste (that in Victoria goes to landfill) produced per annum is 1,800,000 tonnes – a figure that MWRRG and the government state is set to rise to ~2,500,000 tonnes per annum in future years. Even with a push for greater reuse and recycling, it will take decades to reduce these amounts to close to zero.</p> <p>In the absence of energy from waste projects, residual waste would continue to be dumped in landfills, compounding a wide range of existing environmental problems such as greenhouse gas emissions, groundwater contamination, soil contamination and amenity issues (dust, odour, traffic, visual). EfW projects present an alternative opportunity where improvements to the environment and climate change can be made, while society transitions to a zero waste future. As an example, PHI's EfW project will reduce GHG emissions from landfills by approximately 300,000 tonnes of CO_{2-e} per annum – so for every year that the PHI EfW project is not in operation, these significant GHG emissions will be released to the atmosphere (equivalent to 60,000 cars on our roads).</p> <p>According to the 2018 SWRRIP, it is estimated the Victorian's population growth will contribute to an estimated 63% more waste in the next 20 years. In addition to this, seven regional reports for Victoria (RWRRIP) have concluded that</p>	<p>See Section 1.6 and 1.7 of the Works Approval Application report</p> <p>For more information on the policy, please visit: https://www.vic.gov.au/transforming-recycling-victoria *Formally known as the State-wide Waste and Resource Recovery Infrastructure Plan.</p> <p>For more information on the MWRRG's SEMAWP project, please visit: https://www.mwrrg.vic.gov.au/smartersolution/latest-news/shortlisted-companies-announced/</p>

				<p>no new landfills are likely to be constructed over the next 10 years to meet waste management needs.</p> <p>PHI's project is very well aligned with government policy. The Victorian Government's circular economy policy, named 'Recycling Victoria: A new economy' (2020), acknowledges the role waste to energy technologies have in an integrated waste and resource recovery system. The policy includes key commitments of encouraging appropriate waste to energy investment and developing a waste to energy framework.</p> <p>On behalf of the Victorian Government, the Metropolitan Waste and Resource Recovery Group (MWRRG) is running a tendering process for a new energy from waste project in south east Melbourne – called the South East Metropolitan Advanced Waste Processing project (SEMAWP). MWRRG is a statutory body responsible for co-ordinating and facilitating the delivery of waste management and resource recovery across metropolitan Melbourne. The SEMAWP project aims "to provide an alternative to landfill for 16 councils in Melbourne's south east."</p> <p>The rationale for the SEMAWP project is similar as for the PHI EfW project (direct quote from MWRRG): <i>"Landfills in the south east of Melbourne are filling up and no more are planned to be built. Household rubbish in the 16 councils is projected to increase by 40% over the next 25 years. Best outcomes will be achieved by minimising our waste, reusing or recycling, and then what is left over can go to advanced waste processing. Advanced waste processing will help the Victorian government deliver on its circular economy strategy – Recycling Victoria – a 10 year plan that will completely overhaul Victoria's recycling sector and reduce waste going to landfill."</i></p> <p><i>Advanced waste processing solutions will play a significant role in achieving the new target to divert 80 per cent of household rubbish from landfill by 2030. The advanced waste processing procurement will ensure facilities:</i></p> <ul style="list-style-type: none"> • meet best-practice environment protection requirements and energy efficiency standards • reduce the amount of waste sent to landfill • do not displace or inhibit innovation to reduce or recycle materials • reduce greenhouse gas emissions compared to the waste and energy services they displace • have sustainable business models creating new jobs and economic development in local communities. <p><i>Advanced waste processing technologies have been used successfully and safely overseas for years as an alternative to landfill."</i></p> <p>Planning for waste to energy facilities will be part of the upcoming review of the Victorian Recycling Infrastructure Plan*. The Victorian Recycling Infrastructure Plan is a 30-year roadmap to improve Victoria's waste and recycling infrastructure.</p>	
<p>Circa 30% of fly ash & bottom ash possibly going to landfill- Not best practice diversion</p>	-	-	<ul style="list-style-type: none"> • Where will ash be disposed? 	<p>Solid residues (called bottom ash and air pollution control residues (APCr) – sometimes referred to as fly ash) will be generated by the EfW process and will be managed as part of the plant operations. Metals will be separated from the bottom ash and recycled or reused. Initially, the remaining bottom ash will be collected in bins (indoors) and APCr in silos for disposal at suitably licensed landfills.</p> <p>Boiler ash and APCr (flue gas treatment residues carried along with flue gasses/boiler ash) will be treated together. Some of the APCr will be recirculated back, and deposition of the APCr from the bag filters that is not recirculated back will be disposed of to an appropriately licensed prescribed waste landfill. The APCr is expected to be classified as Category B or C Reportable Priority Waste (RPW).</p> <p>The bottom ash is expected to be classified as Reportable Priority Waste (RPW) and it is expected that the bottom ash residues will be able to be accepted at numerous landfills as non-hazardous. The APCr is expected to be classified as Category B or C RPW and is expected to be disposed of at the Taylors Rd landfill in Lyndhurst. APCr is expected to be 2-5% of incoming waste (by mass).</p> <p>PHI plans to reuse bottom ash and APCr over time and achieve 100% diversion of residual waste from landfill. PHI will work with EPA and other stakeholders to ensure that the bottom ash and APCr are fit for reuse purposes and do not pose risks to the environment, as is the case in Europe. The reuse of bottom ash and APCr is common in Europe, based on many decades of EfW operation and extensive research. Ash residues from EfW plants in Europe are commonly treated and reused for various aggregate applications, such as road base or cement bound material.</p>	<p>See Section 9 of the Works Approval Application report</p>
<p>Waste characterisation insufficient</p>	1	<p>provide specific audit/analysis of waste- Barwon SW region waste</p>	<ul style="list-style-type: none"> • Will EPA get PHI to collect their own data on seasonal composition and type of waste? 	<p>Waste modelling and assessment undertaken for the project has found that the majority of materials within residual waste includes the following – organics (49%), paper & cardboard (13.05%) and plastics (12.93%). Materials including metals, textiles, glass, earth-based, masonry, miscellaneous non-combustibles & combustibles, hazardous</p>	<p>See Section 8 of the Works Approval Application report</p>

		not the same as metropolitan Melbourne		<p>finest and e-waste were also identified at much lower contributions.</p> <p>The waste feedstock composition assumptions for the Project will be refined once further datasets are available from the specific councils who are likely to become suppliers for the Project. Further details regarding the waste modelling undertaken and the expected feedstock materials as a percentage per annum is presented in the Works Approval Application Section 8, Table 8.2.</p> <p>Based on PHI's experience with UK and EU EFW projects, the composition of waste from metropolitan Melbourne is not expected to be different to the waste in the Geelong and surrounding region.</p> <p>If EPA grants an approval for the project, PHI expects that there will be a condition in the approval requiring seasonal waste compositional data and assessment.</p>	
Capire Report, section 2.3 Sustainability					
Sustainability of maintain level of waste over course of project	1	Justify 1.2 million tonnes in presentation	<ul style="list-style-type: none"> How have Prospect Hill arrived at the figures? 	The figures used in PHI's presentation at the Conference have been sourced from data in government policies and documents. The data sources include the Statewide Waste and Resource Recovery Infrastructure Plan (SWRRIP) and the Sustainability Victoria (SV) Victorian kerbside waste data portal.	<p>https://www.sustainability.vic.gov.au/about-us/our-mission/our-strategies/statewide-waste-and-resource-recovery-infrastructure-plan-swrrip</p> <p>https://app.powerbi.com/view?r=eyJrIjoiYThiOWFkMzYtODQwMS00ODE2LTgxYzctNDgyZTJmZjAyZGY0IiwidCI6ImIwNzZjZTYwLWNhMmEtNDE4NS05MDQxLTg1MWQxYjdiYzAxYSIsImMiOiJlEwQ%3D%3D</p>
Proposal uses too much potable drinking water. Research water restrictions. Not circular water supply Also contaminated ground water not adequately addressed.	2	Alternative chiller technology. Air cooled chillers. Recycled water	-	<p>PHI has reached out to Barwon Water to discuss the project since July 2020. In that time, we have been corresponding with Barwon Water numerous times and we have also held a virtual meeting with numerous Barwon Water personnel.</p> <p>In our interactions to date, the possibility of alternative water sources has been raised and discussed (e.g. recycled water). PHI is very open to the possibility of using alternative water sources besides potable water. We intend to continue engagement with Barwon Water as the project progresses through the design.</p> <p>A Land and Groundwater Contamination Assessment was conducted which demonstrated that the groundwater level on site was approximately 9 metres below the surface. The construction contract will specify measures to protect groundwater and to meet all EPA requirements, including:</p> <ul style="list-style-type: none"> appropriate management of groundwater (if encountered) no disposal of water to groundwater the use of impervious surfaces (e.g. concrete slabs) in the design to prevent any pathway from the plant to the soil and groundwater 	See Appendix J Land and Groundwater Contamination Assessment
Size of Plant – 400,000 – 600,000 tonne waste facility	1	Clarity around volume on actual permit	<ul style="list-style-type: none"> What permit will be applied for 400 or 600? Where is feedstock come from? 	<p>PHI is proposing the project as a 400,000 tonne per annum (tpa) facility. Provision has been made for an additional future train to the east of the main process plant, which could increase the waste input by a further 200,000 tpa to 600,000 tpa in total. If plans eventuate for an additional train (to a total of 600,000 tpa), an application will be submitted at that time and in accordance with the relevant regulations and standards of that time, however this is beyond the scope of the current proposal.</p> <p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc.</p> <p>With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting</p>	See Section 1.6 and 1.7 of the Works Approval Application report

				residual waste that would otherwise go to landfill.	
Infrastructure - Who will bear the cost/ where will resources come from for infrastructure - roads, gas, water, sewer, consumables etc.	1	Clarity how Prospect Hill will have services to size of site.	• Who will pay for infrastructure services?	The project will require the connection of gas, water and electricity services as well as a road upgrade to Production Way and/or McManus Rd. The gas, water and electricity services are anticipated to be connected at a localised level as there are existing gas, water and electricity services within metres of the site. All of the connections to the services and possible upgrade of Production Way and/or McManus Rd are anticipated to be part of the project cost and hence will be borne by PHI.	
Source of feedstock - purity – assessing waste and contamination	1	Clarity on exact sources of waste	• Who will do quality control?	<p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc.</p> <p>With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting residual waste that would otherwise go to landfill.</p> <p>Prospect Hill International will implement a waste delivery protocol that will involve a range of measures to assess if waste meets the plant's acceptance standards. The plant will be operated under an operational management plan during the operations phase. This will include measures to manage feedstock, including:</p> <ul style="list-style-type: none"> • Number plate recognition software to track incoming and outgoing vehicles. The location of waste origin and vehicle will be recorded for auditing purposes and to identify trends (if any) in the disposal of waste • Before entering the tipping hall, waste will be visually inspected by staff for any obvious contamination, problems or hazards. If a problem or hazard is suspected, the vehicle will move to an inspection area. If the waste is unsuitable but not hazardous (e.g. oversized waste like fridges) it will be loaded into a skip, and if hazardous (e.g. batteries) it will be loaded into a hazardous waste storage container. Waste will be inspected again as it is tipped into the bunker and removed to a separate area if necessary • Random waste delivery audits for quality control • Even after this process, we know that small amounts of harmful materials, like batteries, can be found in household waste. The design of the plant takes this into account, and the high temperature of the boiler and the emissions control equipment mean these materials can be processed and harmful substances removed. • One third of the plant is taken up by emissions control equipment like filters and reactors. Sophisticated control systems set the emissions levels below strict European and Victorian emissions limits and can adjust automatically if pollutant levels from the boiler increase toward licence limits. 	<p>See Section 1.6 and 1.7 of the Works Approval Application report</p> <p>See Section 9 of the Works Approval Application report</p>
Not preventing source/origins of waste. Not creative solution to waste generation	2	<p>Legislate and tax producers of waste especially when its unnecessary. Victorian Government and EPA need to have a plan to draw down carbon. Professional development in project drawdown and permaculture ethics and principles.</p>	<ul style="list-style-type: none"> • Do the Victorian Government and EPA staff know we are in a climate and ecological emergency and headed towards an uninhabitable Earth? • We must cut emissions to zero AND draw down the carbon legacy from the last few decades by leaving trees alone and using the principles of the Australian Landscape Science Institute. • Do staff also know we are in the sixth mass extinction of species? We must support the creation of jobs that regenerate ecosystems and massively reduce demand for energy. 	<p>PHI advocates for a zero waste future. However, Victoria is many years (most likely decades) away from realising zero waste and a fully circular economy. PHI views energy from waste as a transitional technology to help improve the environment while moving towards zero waste.</p> <p>Despite the ambitions of governments and councils for a zero waste society, it is clear that zero waste in Australia will not occur in the near future (10-20 years). This is based on the global experience where numerous jurisdictions have stated ambitions for zero waste over the past 2-3 decades, yet no jurisdiction is close to achieving zero waste. The best performing jurisdictions in the world on waste management, reuse and recycling (Sweden, Denmark, Finland, Netherlands), still produce 43-57% residual waste – Germany is the stand-out producing 'only' 33% residual waste. Based on the European experience over many decades and the comparative superiority in existing reuse/recycling programs, it is unrealistic to believe that Victoria can surpass EU jurisdictions and achieve zero waste within the next 1-2 decades.</p> <p>The current recycling rate in Victoria is approximately 45% and the amount of residual waste (that in Victoria goes to landfill) produced per annum is 1,800,000 tonnes – a figure that MWRRG and the government state is set to rise to ~2,500,000 tonnes per annum in future years. Even with a push for greater reuse and recycling, it will take decades to reduce these amounts to close to zero.</p> <p>In the absence of energy from waste projects, residual waste would continue to be dumped in landfills, compounding a wide range of existing environmental problems such as greenhouse gas emissions, groundwater contamination, soil contamination and amenity issues (dust, odour, traffic, visual). EfW projects present an alternative opportunity where improvements to the environment and climate change can be made, while society transitions to a zero waste future. As an example, PHI's EfW project will reduce GHG emissions from landfills by approximately 300,000 tonnes of CO_{2-e} per annum – so for every year that the PHI EfW project is not in operation, these significant GHG emissions will be</p>	<p>See Section 1.6 and 1.7 of the Works Approval Application report</p> <p>For more information on the policy, please visit: https://www.vic.gov.au/transforming-recycling-victoria *Formally known as the State-wide Waste and Resource Recovery Infrastructure Plan.</p> <p>For more information on the MWRRG's SEMAWP project, please visit: https://www.mwrrg.vic.gov.au/smartersolution/latest-news/shortlisted-companies-announced/</p>

				<p>released to the atmosphere (equivalent to 60,000 cars on our roads).</p> <p>According to the 2018 SWRRIP, it is estimated the Victorian's population growth will contribute to an estimated 63% more waste in the next 20 years. In addition to this, seven regional reports for Victoria (RWRRIP) have concluded that no new landfills are likely to be constructed over the next 10 years to meet waste management needs.</p> <p>PHI's project is very well aligned with government policy. The Victorian Government's circular economy policy, named 'Recycling Victoria: A new economy' (2020), acknowledges the role waste to energy technologies have in an integrated waste and resource recovery system. The policy includes key commitments of encouraging appropriate waste to energy investment and developing a waste to energy framework.</p> <p>On behalf of the Victorian Government, the Metropolitan Waste and Resource Recovery Group (MWRRG) is running a tendering process for a new energy from waste project in south east Melbourne – called the South East Metropolitan Advanced Waste Processing project (SEMAWP). MWRRG is a statutory body responsible for co-ordinating and facilitating the delivery of waste management and resource recovery across metropolitan Melbourne. The SEMAWP project aims "to provide an alternative to landfill for 16 councils in Melbourne's south east."</p> <p>The rationale for the SEMAWP project is similar as for the PHI EfW project (direct quote from MWRRG): <i>"Landfills in the south east of Melbourne are filling up and no more are planned to be built. Household rubbish in the 16 councils is projected to increase by 40% over the next 25 years. Best outcomes will be achieved by minimising our waste, reusing or recycling, and then what is left over can go to advanced waste processing. Advanced waste processing will help the Victorian government deliver on its circular economy strategy – Recycling Victoria – a 10 year plan that will completely overhaul Victoria's recycling sector and reduce waste going to landfill."</i></p> <p><i>Advanced waste processing solutions will play a significant role in achieving the new target to divert 80 per cent of household rubbish from landfill by 2030. The advanced waste processing procurement will ensure facilities:</i></p> <ul style="list-style-type: none"> • <i>meet best-practice environment protection requirements and energy efficiency standards</i> • <i>reduce the amount of waste sent to landfill</i> • <i>do not displace or inhibit innovation to reduce or recycle materials</i> • <i>reduce greenhouse gas emissions compared to the waste and energy services they displace</i> • <i>have sustainable business models creating new jobs and economic development in local communities.</i> <p><i>Advanced waste processing technologies have been used successfully and safely overseas for years as an alternative to landfill."</i></p> <p>Planning for waste to energy facilities will be part of the upcoming review of the Victorian Recycling Infrastructure Plan*. The Victorian Recycling Infrastructure Plan is a 30-year roadmap to improve Victoria's waste and recycling infrastructure.</p> <p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc.</p> <p>With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting residual waste that would otherwise go to landfill.</p> <p>Diverting this residual waste to an Energy from Waste facility provides an opportunity to recover value in the form of energy, which is a part of the Recycling Victoria strategy, and is preferred over containment or disposal (landfills). Modelling shows that with sufficient infrastructure, 45-50% of the waste currently going to landfill could be diverted for reuse, using Waste to Energy technology.</p>	
Are truck/transport emissions factored into the CO ₂ calculations and lifecycle supply chain (total emissions)?	-	Transparent accounting CO ₂ & CH ₄ and toxic chemicals prior to ANY approval	-	Truck and transport emissions are factored into the CO ₂ calculations, for the full life cycle of the project; i.e. from the construction phase and through the operating life of the plant. These emissions combined with all other greenhouse gas emissions from the construction and operation of the plant are still much lower than the emissions of greenhouse gases from the waste if the waste continues to be disposed at landfills – the EfW project will have a net reduction in greenhouse gas emissions for the state and have a positive environmental benefit.	See Appendix C Greenhouse Gas Assessment
Impacts on climate and global warming of project	-	-	-	The Greenhouse Gas Assessment demonstrates that the installation of the EfW Plant will have a net reduction in GHG emissions. Although the project will have direct emissions of approximately 192,000 tonnes CO ₂ e per year when	See Appendix C Greenhouse Gas Assessment

need to have plan for greenhouse gases				combined with other operational emissions, the net benefit (emissions that will be avoided) of the project, is approximately 300,000 tonnes CO2e per year. By comparison, landfill of the waste would result in emissions of 300,000 tonnes CO2e per year.	
Localise our goods and services, to reduce emissions!	-	Professional development for councillors, EPA, and Victorian Government staff in the transition town/permaculture principles. Remove barriers for initiatives that have or will design waste out of their systems. Microgrids and good design of all new buildings to reduce demand for energy. Use basic passive solar principles including orientation i.e. raise the rating system for all new homes & reduce the allowable size of homes and BANGAs.	-	This comment would be best addressed by EPA or government.	
What is the financial burden on council/ratepayer?	-	Financial transparency before project approved	-	PHI's EfW project is privately funded so there will be no burden on the council/rate payer for the project's construction. During the operational phase of the project, it is anticipated that the project will generate revenue from waste suppliers (e.g. councils, schools, shopping centres, offices, waste management companies, etc) and that this revenue would be funded by diverting funds away from the costs of disposing waste to landfill. PHI anticipates that the costs of waste disposal for councils would be cheaper for the EfW project compared to the status quo of disposal to landfill. PHI expects the cost of waste management to decrease for ratepayers as a result of the project.	
What would be the impact on local wildlife and ecosystems?	-	Work with relevant bodies to explore and produce the impact potentially on all the species who currently live here	-	<p>With regard to biodiversity at the proposed EfW site, a Flora and Fauna Assessment was conducted of the site and found that the site did not contain any flora and fauna values. It was found that the site had been cleared in the past for other activities (farming) and no ecological values remain.</p> <p>With regard to potential flora and fauna impacts of emissions from the operating plant, the concentration of bioaccumulative pollutants in animals and plants was calculated and concluded to be of negligible risk.</p> <p>Nearly all plant and equipment at the site will be housed within enclosed buildings, so the risk of injury to animals is extremely low. The site will be similar in building form to other industrial premises currently operating in the Geelong Ring Road Employment Precinct (GREP) – such as Rocke Transport, SNF chemical manufacturing plant, CivilMart, Clariant Specialty Chemicals manufacturing plant, Geelong Galvanizing and Thorton Steel Fabrication.</p>	See Appendix H Flora and Fauna Assessment See Appendix F Health Impact Assessment
What is the target rubbish - feedstock? In order to understand source	1	Provide transparency prior to any approval about what the waste is Be creative about how to get rid of the source of the problem. Whole cities may not have creative solutions but small communities do!!! Be creative about other energy options that are sustainable	• Won't it subconsciously or consciously tie us into keeping on producing waste if our energy is reliant on it?	<p>PHI advocates for a zero waste future. However, Victoria is many years (most likely decades) away from realising zero waste and a fully circular economy. PHI views energy from waste as a transitional technology to help improve the environment while moving towards zero waste.</p> <p>Despite the ambitions of governments and councils for a zero waste society, it is clear that zero waste in Australia will not occur in the near future (10-20 years). This is based on the global experience where numerous jurisdictions have stated ambitions for zero waste over the past 2-3 decades, yet no jurisdiction is close to achieving zero waste. The best performing jurisdictions in the world on waste management, reuse and recycling (Sweden, Denmark, Finland, Netherlands), still produce 43-57% residual waste – Germany is the stand-out producing 'only' 33% residual waste. Based on the European experience over many decades and the comparative superiority in existing reuse/recycling programs, it is unrealistic to believe that Victoria can surpass EU jurisdictions and achieve zero waste within the next 1-2 decades.</p> <p>The current recycling rate in Victoria is approximately 45% and the amount of residual waste (that in Victoria goes to landfill) produced per annum is 1,800,000 tonnes – a figure that MWRRG and the government state is set to rise to ~2,500,000 tonnes per annum in future years. Even with a push for greater reuse and recycling, it will take decades to reduce these amounts to close to zero.</p>	<p>See Section 1.6 and 1.7 of the Works Approval Application report</p> <p>For more information on the policy, please visit: https://www.vic.gov.au/transforming-recycling-victoria *Formally known as the State-wide Waste and Resource Recovery Infrastructure Plan.</p> <p>For more information on the MWRRG's SEMAWP project, please visit: https://www.mwrrg.vic.gov.a</p>

			<p>In the absence of energy from waste projects, residual waste would continue to be dumped in landfills, compounding a wide range of existing environmental problems such as greenhouse gas emissions, groundwater contamination, soil contamination and amenity issues (dust, odour, traffic, visual). EfW projects present an alternative opportunity where improvements to the environment and climate change can be made, while society transitions to a zero waste future. As an example, PHI's EfW project will reduce GHG emissions from landfills by approximately 300,000 tonnes of CO₂-e per annum – so for every year that the PHI EfW project is not in operation, these significant GHG emissions will be released to the atmosphere (equivalent to 60,000 cars on our roads).</p> <p>According to the 2018 SWRRIP, it is estimated the Victorian's population growth will contribute to an estimated 63% more waste in the next 20 years. In addition to this, seven regional reports for Victoria (RWRRIP) have concluded that no new landfills are likely to be constructed over the next 10 years to meet waste management needs.</p> <p>PHI's project is very well aligned with government policy. The Victorian Government's circular economy policy, named 'Recycling Victoria: A new economy' (2020), acknowledges the role waste to energy technologies have in an integrated waste and resource recovery system. The policy includes key commitments of encouraging appropriate waste to energy investment and developing a waste to energy framework.</p> <p>On behalf of the Victorian Government, the Metropolitan Waste and Resource Recovery Group (MWRRG) is running a tendering process for a new energy from waste project in south east Melbourne – called the South East Metropolitan Advanced Waste Processing project (SEMAWP). MWRRG is a statutory body responsible for co-ordinating and facilitating the delivery of waste management and resource recovery across metropolitan Melbourne. The SEMAWP project aims " to provide an alternative to landfill for 16 councils in Melbourne's south east."</p> <p>The rationale for the SEMAWP project is similar as for the PHI EfW project (direct quote from MWRRG): <i>"Landfills in the south east of Melbourne are filling up and no more are planned to be built. Household rubbish in the 16 councils is projected to increase by 40% over the next 25 years. Best outcomes will be achieved by minimising our waste, reusing or recycling, and then what is left over can go to advanced waste processing. Advanced waste processing will help the Victorian government deliver on its circular economy strategy – Recycling Victoria – a 10 year plan that will completely overhaul Victoria's recycling sector and reduce waste going to landfill."</i></p> <p><i>Advanced waste processing solutions will play a significant role in achieving the new target to divert 80 per cent of household rubbish from landfill by 2030. The advanced waste processing procurement will ensure facilities:</i></p> <ul style="list-style-type: none"> • <i>meet best-practice environment protection requirements and energy efficiency standards</i> • <i>reduce the amount of waste sent to landfill</i> • <i>do not displace or inhibit innovation to reduce or recycle materials</i> • <i>reduce greenhouse gas emissions compared to the waste and energy services they displace</i> • <i>have sustainable business models creating new jobs and economic development in local communities.</i> <p><i>Advanced waste processing technologies have been used successfully and safely overseas for years as an alternative to landfill."</i></p> <p>Planning for waste to energy facilities will be part of the upcoming review of the Victorian Recycling Infrastructure Plan*. The Victorian Recycling Infrastructure Plan is a 30-year roadmap to improve Victoria's waste and recycling infrastructure.</p> <p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc. With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting residual waste that would otherwise go to landfill.</p> <p>Diverting this residual waste to an Energy from Waste facility provides an opportunity to recover value in the form of energy, which is a part of the Recycling Victoria strategy, and is preferred over containment or disposal (landfills). Modelling shows that with sufficient infrastructure, 45-50% of the waste currently going to landfill could be diverted for reuse, using Waste to Energy technology.</p>	<p>u/smartersolution/latest-news/shortlisted-companies-announced/</p>
--	--	--	---	---

				PHI's EfW project will work in concert with reuse and recycling policies to reduce the generation and disposal of residual waste.	
This project is not helping people reduce energy demand. Not sustainable energy	-	Encourage/remove barriers and approve hyperlocal initiative to reduce demand for energy e.g. transition town movement	<ul style="list-style-type: none"> • What is the Victorian Government doing to support localisation of goods and services? • What is the Victorian Government doing to legislate production of waste? 	This comment would be best addressed by EPA or government.	
Could 20 hectares be used for drawing down carbon and regenerate ecologies	-	Work with Council to organise a proactive visioning process with Lara residents based on the most innovative climate and ecological solutions.	-	<p>In the Australian context, energy from waste is an innovative solution to waste management problems. There are currently no large-scale EfW projects utilising municipal waste in Australia. However, these facilities have been operating in Europe and around the world for many decades.</p> <p>PHI advocates for a zero waste future. However, Victoria is many years (most likely decades) away from realising zero waste and a fully circular economy. PHI views energy from waste as a transitional technology to help improve the environment while moving towards zero waste.</p> <p>Despite the ambitions of governments and councils for a zero waste society, it is clear that zero waste in Australia will not occur in the near future (10-20 years). This is based on the global experience where numerous jurisdictions have stated ambitions for zero waste over the past 2-3 decades, yet no jurisdiction is close to achieving zero waste. The best performing jurisdictions in the world on waste management, reuse and recycling (Sweden, Denmark, Finland, Netherlands), still produce 43-57% residual waste – Germany is the stand-out producing 'only' 33% residual waste. Based on the European experience over many decades and the comparative superiority in existing reuse/recycling programs, it is unrealistic to believe that Victoria can surpass EU jurisdictions and achieve zero waste within the next 1-2 decades.</p> <p>The current recycling rate in Victoria is approximately 45% and the amount of residual waste (that in Victoria goes to landfill) produced per annum is 1,800,000 tonnes – a figure that MWRRG and the government state is set to rise to ~2,500,000 tonnes per annum in future years. Even with a push for greater reuse and recycling, it will take decades to reduce these amounts to close to zero.</p> <p>In the absence of energy from waste projects, residual waste would continue to be dumped in landfills, compounding a wide range of existing environmental problems such as greenhouse gas emissions, groundwater contamination, soil contamination and amenity issues (dust, odour, traffic, visual). EfW projects present an alternative opportunity where improvements to the environment and climate change can be made, while society transitions to a zero waste future. As an example, PHI's EfW project will reduce GHG emissions from landfills by approximately 300,000 tonnes of CO_{2-e} per annum – so for every year that the PHI EfW project is not in operation, these significant GHG emissions will be released to the atmosphere (equivalent to 60,000 cars on our roads).</p>	
Contaminants in groundwater and wastewater management	-	Proper treatment plant for waste/ground water and monitoring (independent)	-	<p>A Land and Groundwater Contamination Assessment was conducted which demonstrated that the groundwater level on site was approximately 9 metres below the surface. The construction contract will specify measures to protect groundwater and to meet all EPA requirements, including:</p> <ul style="list-style-type: none"> • appropriate management of groundwater (if encountered) • no disposal of water to groundwater • the use of impervious surfaces (e.g. concrete slabs) in the design to prevent any pathway from the plant to the soil and groundwater 	See Appendix J Land and Groundwater Contamination Assessment
Live data around emissions and environmental and health data for the public	-	Continuous Environment Monitoring System should be implemented as part of the project	-	<p>We are committed to managing emissions from our energy from waste plant to reduce potential impacts to the community. The air pollution control (APC) system is a sophisticated system that will cover approximately one third of the plant's footprint and accounts for a large proportion of the plant's construction and operational costs.</p> <p>The APC system is designed to utilise the latest best practice technology and will include bag filters, chemical addition (e.g. bicarbonate, activated carbon or lime) and reactors to treat the emissions prior to being exhausted from the chimney (or stack).</p> <p>The important aspect to note is that the APC system will be designed so that the stack emissions comply with the European Union emissions limits (EU IED - Industrial Emissions Directive) and Environment Protection Authority Victoria limits. The APC system will be fitted with a continuous emissions monitoring system (CEMS) which will monitor the performance of the control system and the emissions from the plant. The CEMS will provide constant</p>	See Appendix D Air Quality Impact Assessment See Section 7 of the Works Approval Application report

				<p>monitoring of a wide range of emissions to demonstrate compliance with EU IED and EPA limits and will also identify reductions in performance and alert the operators of any issues – before emissions reach limits.</p> <p>Regular calibration checks on equipment and national association of testing authorities (NATA) accredited tests will also occur on the CEMS, and an operation and maintenance program will provide the framework required to undertake regular maintenance on the plant.</p> <p>To comply with EPA licence conditions, licence holders (i.e. Prospect Hill International) must report on environmental performance for the previous financial year. This is an annual performance statement (APS) which will list performance against each licence condition and requires an explanation of all non-compliance incidents and what actions have been taken to address the issue. In accordance with EPA regulations, APS reporting does not replace the need for immediate reporting of non-compliances to EPA.</p> <p>As well as periodic reporting to EPA, PHI intends to provide data on the plant's operational emissions available to the public.</p>	
Lara feels like a dumping ground for unattractive, polluting industries and so are defensive of what is proposed	-	A combined visioning session that is inspiring for Lara residents and business with the relevant bodies who make big decisions i.e. State Government, EPA council, Lara residents and businesses - Lara could be a world leader in regenerative living & jobs! - Provide visual material in plans, renderings, photographs, illustrations	-	<p>Prospect Hill International wants to regenerate employment opportunities in the industrial sector. Geelong and the surrounding region have suffered from the closure of large manufacturing plants over recent years. PHI sees this project as an opportunity to bring back some of those skilled jobs to the area and hopes to employ people who may have been impacted by skilled job losses in recent years. The project will create hundreds of new jobs during construction and more than 30 jobs during operation.</p> <p>A Landscape and Visual Impact Assessment was conducted for the project. The assessment concluded that these types of planning zones (Industrial 2 Zone) are not considered as being visually sensitive. As the Project is immediately surrounded by cleared farmland and industrial areas, most views toward the site are not considered to be visually sensitive as the landscape is already highly disturbed. The assessment also includes a full suite of plans, renderings and photomontages to provide a comprehensive artistic impression of the proposed appearance of the plant.</p>	
Water	-	-	<ul style="list-style-type: none"> • How much water is needed to drive the turbine? • Where does it come from? • How does it get there? 	<p>The EfW plant will use approximately 2.5ML of water per day for operational purposes, including for the turbines, cooling water, flue gas treatment and amenities. The GREP area is well set up for industrial uses and there are suitable water mains already existing close to the EfW site.</p> <p>PHI has reached out to Barwon Water to discuss the project since July 2020. In that time, we have been corresponding with Barwon Water numerous times and we have also held a virtual meeting with numerous Barwon Water personnel.</p> <p>In our interactions to date, the possibility of alternative water sources has been raised and discussed (e.g. recycled water). PHI is very open to the possibility of using alternative water sources besides potable water. We intend to continue engagement with Barwon Water as the project progresses through the design.</p>	See Section 10 of the Works Approval Application report
Capire Report, section 2.4 Governance, responsibility, transparency					
Lack of external accountability (during engineering and post-deployment)	4	Independent auditing/monitoring	This has been asked before - what about our previous questions?	<p>If approvals are granted, PHI expects very stringent conditions of approval for the construction AND operation of the EfW plant. PHI expects that there will be conditions for reviewing and approving elements of the design to permit for construction as well as conditions for operations such as waste monitoring/auditing and control and reporting of emissions.</p> <p>Regardless of the conditions likely to be imposed on PHI, we will construct and operate the plant to the highest EU and Victorian standards. Management plans will include auditing and compliance checking, including the use of independent third-party reviewers.</p>	
Lack of financial accountability (who will pay?)	-	Proof/legal binding contracts and transparency	Who foots the bill? For example, illegal construction and demolition waste stockpile precedent	PHI's EfW project is privately funded so there will be no burden on the council/rate payer for the project's construction. During the operational phase of the project, it is anticipated that the project will generate revenue from waste suppliers (e.g. councils, schools, shopping centres, offices, waste management companies, etc) and that this revenue would be funded by diverting funds away from the costs of disposing waste to landfill. PHI anticipates that the costs of waste disposal for councils would be cheaper for the EfW project compared to the status quo of disposal to landfill. PHI expects the cost of waste management to decrease for ratepayers as a result of the project.	

Who is Prospect Hill International? Offshore?	7	Make ownership information public. Ledger of finances ongoing	<ul style="list-style-type: none"> • It's a new company. • How have they developed up until now? • 5 years of registration (2017)...where is their bank account statement- what have they been doing for 5 years to make money to finance this? • What is the cost of plant construction? 	<p>Prospect Hill International is an energy from waste company located in Melbourne, Victoria. We are committed to developing a state-of-the-art energy from waste facility to support the creation of a more sustainable world. We believe that energy from waste forms a crucial part of the wider sustainable waste management chain, supporting the diversion of waste from landfill and contributing to energy security.</p> <p>PHI is an Australian-owned company. Utilising our combined project experience and industry contacts, we are partnering with various companies to deliver a world-class EFW project that adheres to the highest global, EU and Victorian standards.</p> <p>Details about PHI's company structure are readily available to the public on the various ASIC and Australian company websites and databases. PHI's three directors are:</p> <p>Honourable Ken Smith, AM. Mr Smith has had an outstanding political career in the Victorian Parliament having served as the Member for South Eastern Province from 1988-2002 and as the Member for Bass from 2002-2014 and as Speaker of the Legislative Assembly from 2010-2014. During his time in Parliament Mr Smith served as the Shadow Minister for Local Government, Gaming and Fisheries. He also served as Chairman of Government and Parliamentary Committees.</p> <p>Mr Smith brings to the Project his vast experience in working with State and Local Government. He is passionate about finding a solution to the waste crisis in Australia and is driven to bring Investment and jobs to Victoria and the Geelong region through this excellent proposal.</p> <p>Mr. Jian Qi. Mr Qi is a chemical engineer and petrochemical expert who gained decades of experience in large scale engineering and industrial projects while working with Petrochina, Shell Global Solutions, and GE Oil & Gas. He brings vast experience in project development, including feasibility, design, construction and commissioning phases for heavy industrial projects. Mr Qi's vision is to bring the best energy from waste technology from around the world to Victoria.</p> <p>Mr. Wendong Huang. Mr Huang has had a career in the mining and construction development industry which has provided him with a rich experience in engineering and project development. In recent years, he has been involved in environment protection in Tasmania and Victoria and is passionate about finding a sustainable waste solution for Victoria.</p>	
Transparency of location (technical assessment)	-	A public report and list of alternatives	<ul style="list-style-type: none"> • If there were alternatives, why Lara? 	<p>There are many factors that influence the selection of a suitable site for an energy from waste plant. During the feasibility stage of this project we assessed several potential project sites using the following key criteria:</p> <ul style="list-style-type: none"> • zoning of the land, • road access, • availability of services, • site readiness • potential social and environmental impacts. <p>The selected project site in Lara scored well on all criteria. The key factors that make the Lara site suitable for this project are:</p> <ul style="list-style-type: none"> • The site is located within the Geelong Ring Road Employment Precinct (GREP). The GREP is Geelong's largest designated industrial development precinct and includes over 500 hectares of land zoned for heavy industrial purposes. • The site is located within an industrial planning zone (Industrial 2 Zone or "IN2Z") which is designated for large industrial purposes like an energy from waste plant. Under the planning scheme, one of the purposes of the IN2Z is "To provide for manufacturing industry, the storage and distribution of goods and associated facilities". • Geelong and the surrounding region have suffered from the closure of large manufacturing plants over recent years. Prospect Hill International sees this project as an opportunity to bring back some of those skilled jobs to the area and hopes to employ people who may have been impacted by skilled job losses in recent years. • The site is located close to potential waste sources, including Geelong, the Surf Coast and Bellarine as well as the growing region of western Melbourne. • The site has good transport links, being close to the Princes Freeway and Geelong Bypass. • Trucks that transport waste to the plant will be able to access the site through roads in the industrial zone and not have to travel on residential streets. <p>Experience with these types of plants around the world shows that they have very low amenity impacts to surrounding communities. There are many examples of EFW plants being located within tens or hundreds of metres of large residential populations (tens of thousands of people), such as London, Paris, Tokyo, Zurich and Vienna.</p>	

				Modern energy from waste plants include sophisticated measures to minimise impacts on surrounding communities, like noise reduction and sound proofing design elements, state-of-the-art air emissions controls and advanced odour controls.	
Transparency about in-coming waste	1	Public records of the waste inputs/waste forecasts	-	<p>Prospect Hill International's energy from waste facility plans to divert ~400,000 tonnes per annum of Municipal Solid Waste (MSW) from landfills. The waste feedstock will be sourced from residual household and commercial waste and will only comprise of residual waste that is not destined for recycling.</p> <p>PHI advocates for a zero waste future. However, Victoria is many years (most likely decades) away from realising zero waste and a fully circular economy. PHI views energy from waste as a transitional technology to help improve the environment while moving towards zero waste.</p> <p>Despite the ambitions of governments and councils for a zero waste society, it is clear that zero waste in Australia will not occur in the near future (10-20 years). This is based on the global experience where numerous jurisdictions have stated ambitions for zero waste over the past 2-3 decades, yet no jurisdiction is close to achieving zero waste. The best performing jurisdictions in the world on waste management, reuse and recycling (Sweden, Denmark, Finland, Netherlands), still produce 43-57% residual waste – Germany is the stand-out producing 'only' 33% residual waste. Based on the European experience over many decades and the comparative superiority in existing reuse/recycling programs, it is unrealistic to believe that Victoria can surpass EU jurisdictions and achieve zero waste within the next 1-2 decades.</p> <p>The current recycling rate in Victoria is approximately 45% and the amount of residual waste (that in Victoria goes to landfill) produced per annum is 1,800,000 tonnes – a figure that MWRRG and the government state is set to rise to ~2,500,000 tonnes per annum in future years. Even with a push for greater reuse and recycling, it will take decades to reduce these amounts to close to zero.</p> <p>According to the 2018 SWRRIP, it is estimated the Victorian's population growth will contribute to an estimated 63% more waste in the next 20 years. In addition to this, seven regional reports for Victoria (RWRRIP) have concluded that no new landfills are likely to be constructed over the next 10 years to meet waste management needs.</p>	<p>See Section 1.6 and 1.7 of the Works Approval Application report</p> <p>For more information on the policy, please visit: https://www.vic.gov.au/trans-forming-recycling-victoria *Formally known as the State-wide Waste and Resource Recovery Infrastructure Plan.</p>
Speed of incidence response	2	Public incidence Action Plan	-	As part of the construction and operations, PHI will have an emergency management plan to manage potential emergency incidents that could arise. It is anticipated that the plan will be reviewed by EPA and potentially other relevant bodies (e.g. CFA).	
Capire Report, section 2.5 Human health and/or hazards					
Fly ash management	6	-	<ul style="list-style-type: none"> • Where will it be taken to? (which licensed facility) • Who will transport the waste? • Who is managing where its being taken to? • What safeguards are in place for the movement? • Frequency of waste being transported? 	<p>Solid residues (called bottom ash and air pollution control residues (APCr) – sometimes referred to as fly ash) will be generated by the EfW process and will be managed as part of the plant operations. Metals will be separated from the bottom ash and recycled or reused. Initially, the remaining bottom ash will be collected in bins (indoors) and APCr in silos for disposal at suitably licensed landfills.</p> <p>Boiler ash and APCr (flue gas treatment residues carried along with flue gasses/boiler ash) will be treated together. Some of the APCr will be recirculated back, and deposition of the APCr from the bag filters that is not recirculated back will be disposed of to an appropriately licensed prescribed waste landfill. The APCr is expected to be classified as Category B or C Reportable Priority Waste (RPW).</p> <p>The bottom ash is expected to be classified as Reportable Priority Waste (RPW) and it is expected that the bottom ash residues will be able to be accepted at numerous landfills as non-hazardous. The APCr is expected to be classified as Category B or C RPW and is expected to be disposed of at the Taylors Rd landfill in Lyndhurst. APCr is expected to be 2-5% of incoming waste (by mass).</p> <p>PHI will only use EPA-licensed transporters to transport the ash residues to landfills.</p> <p>PHI plans to reuse bottom ash and APCr over time and achieve 100% diversion of residual waste from landfill. PHI will work with EPA and other stakeholders to ensure that the bottom ash and APCr are fit for reuse purposes and do not pose risks to the environment, as is the case in Europe. The reuse of bottom ash and APCr is common in Europe, based on many decades of EfW operation and extensive research. Ash residues from EfW plants in Europe are commonly treated and reused for various aggregate applications, such as road base or cement bound material.</p>	See Section 9 of the Works Approval Application report

<p>Waste source Industrial waste? Kerbside waste?</p>	<p>7</p>	<p>If inappropriate waste is accepted, how is this managed? Waste separation at the site? Who is supplying the Waste to energy facility approved in Laverton, concerning the proposed councils can't supply the volumes? Potential to receive hazardous waste, how will this be sorted? from kerbside especially. Present examples of emissions/health impacts from Europe.</p>	<ul style="list-style-type: none"> • How was the estimated 100,000 tonnes from G21 locations derived at? • Council of Greater Geelong predict only 16,000 tonnes once food and garden organics and other initiatives have been implemented (garden organics already in place). 	<p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc. With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting residual waste that would otherwise go to landfill.</p> <p>PHI will implement a waste delivery protocol that will involve a range of measures to assess if waste meets the plant's acceptance standards. The plant will be operated under an operational management plan during the operations phase. This will include measures to manage feedstock, including:</p> <ul style="list-style-type: none"> • Number plate recognition software to track incoming and outgoing vehicles. The location of waste origin and vehicle will be recorded for auditing purposes and to identify trends (if any) in the disposal of waste • Before entering the tipping hall, waste will be visually inspected by staff for any obvious contamination, problems or hazards. If a problem or hazard is suspected, the vehicle will move to an inspection area. If the waste is unsuitable but not hazardous (e.g. oversized waste like fridges) it will be loaded into a skip, and if hazardous (e.g. batteries) it will be loaded into a hazardous waste storage container. Waste will be inspected again as it is tipped into the bunker and removed to a separate area if necessary • Random waste delivery audits for quality control • Even after this process, we know that small amounts of harmful materials, like batteries, can be found in household waste. The design of the plant takes this into account, and the high temperature of the boiler and the emissions control equipment mean these materials can be processed and harmful substances removed. • One third of the plant is taken up by emissions control equipment like filters and reactors. Sophisticated control systems set the emissions levels below strict European and Victorian emissions limits and can adjust automatically if pollutant levels from the boiler increase toward licence limits. <p>The figures used by PHI to derive likely waste tonnages and trends in waste generation/management have been sourced from data in government policies and documents. The data sources include the Statewide Waste and Resource Recovery Infrastructure Plan (SWRRIP) and the Sustainability Victoria (SV) Victorian kerbside waste data portal.</p>	<p>See Section 1.6 and 1.7 of the Works Approval Application report</p> <p>See Section 9 of the Works Approval Application report</p> <p>https://www.sustainability.vic.gov.au/about-us/our-mission/our-strategies/statewide-waste-and-resource-recovery-infrastructure-plan-swrrip</p> <p>https://app.powerbi.com/view?r=eyJrJoiYThiOWFkMzYtODQwMS00ODE2LTgxYzctNDgyZTJmZjAyZGY0IiwidCI6ImIwNzZjZTYwLWNhMmEtNDEN4NS05MDQxLTg1MWQxYjdiYzAxYSIsImMiOiJlEwFwQ%3D%3D</p>
<p>Negative social impacts</p>	<p>-</p>	<p>Recognition of human impact - Community already dealing with another local waste issue - Covid stress - Now a new hazardous facility</p>	<p>-</p>	<p>PHI recognises that some community members are dealing with stresses from the Broderick Rd waste stockpile issue and COVID-19. PHI is proposing a positive project to develop a state-of-the-art energy from waste facility to support the creation of a more sustainable world. The project will provide environmental and greenhouse gas benefits for society and also provide local jobs and economic development for the Lara community.</p> <p>PHI's project is intended to be a beacon for how to conduct waste management properly. This is why PHI is proposing a technology that is proven and reliable and has a track record of over 500 plants around the world operating for many decades and with excellent environmental and economic benefits.</p>	
<p>Jacobs offered Health Impact Assessment is rubbish. Ditto risk assessment</p>	<p>-</p>	<p>Go away and don't come back → refusal of permit</p>	<p>-</p>	<p>A comprehensive Health Impact Assessment (HIA) was conducted and the assessment considered potential impacts from pollutants and impacts related to air emissions, odours, noise, economics, waste and transport. Multiple exposure pathways relevant to both adults and children were assessed and the risks have been calculated on the basis of the maximum predicted deposition rate for all of the sensitive receptors in the surrounding community. As a result, this approach is representative of the maximum impacted rural residential location and provides a conservative estimation of risks relevant to other rural residential and urban residential areas.</p> <p>The HIA found the risk of potential health impacts on the community would be low to negligible. The health impact assessment considered potential impacts due to air emissions, noise and particulate deposition (i.e. where particulates may deposit on to pasture or soils and be ingested by human or animals). The HIA concluded that:</p> <ul style="list-style-type: none"> • There are no acute risk issues of concern for health issues related to air quality and inhalation, deposition or multiple pathway exposures • Chronic and incremental carcinogenic risks are negligible and essentially representative of zero risk. <p>Proper operation and maintenance, and monitoring of the pollution control/flue gas equipment are measures that will be implemented to mitigate any potential negative impacts.</p> <p>The Risk Assessment included in the Works Approval Application presents the key risks – predominantly risks of the project to the surrounding environment and community. The risk assessment presents various risks, potential impact</p>	<p>See Appendix F Health Impact Assessment See Section 6.3 of the Works Approval Application report</p>

				of these risks, proposed mitigation measures and the residual risk when mitigations are included. The results of this risk assessment were used to focus the best practice assessment of mitigation measures. This led to most of the Medium and High operational risks being reduced to Low residual risks.													
Proposal is selective about which parts of the 2019 BREF will be complied with	-	Particular attention needs to be paid to BAT11 and BAT25. That is, BAT eleven and BAT twenty-five.	-	PHI intends to adhere to all of the Best Available Techniques as outlined in the 2019 BREF under the EU IED, including BAT11 (waste acceptance procedures) and BAT25 (emissions of dust, metals and metalloids).													
Speed of incidence response	2	Action plan	-	As part of the construction and operations, PHI will have an emergency management plan to manage potential emergency incidents that could arise. It is anticipated that the plan will be reviewed by EPA and potentially other relevant bodies (e.g. CFA).													
Capire Report, section 2.6 Emissions, pollution, air quality																	
400,000 tonnes of waste going up the flume into the atmosphere	1	More information	• Where does the airborne mass (400,000 tonnes/year) land eventually?	<p>The Air Quality Assessment demonstrates that there is a low risk of air quality impact from the project's emissions. The assessment shows that the emissions of all substances from the EfW Plant will meet all EU IED (European Union - Industrial Emissions Directive) and EPA emission limits. The assessment also shows that the EfW Plant emissions will meet all ground level concentration design criteria for all substances, as specified in EPA requirements.</p> <p>Emissions of air toxics such as IARC Group 1 carcinogens hexavalent chromium (Cr (VI)), cadmium (Cd) and mercury (Hg) were investigated for this assessment. Model results for all of the carcinogens showed that the ground level concentrations due to the EfW Plant are below the relevant EPA criteria, mostly many times below their criterion.</p> <p>A Health Impact Assessment (HIA) was completed as part of the Works Approval Application. The HIA concluded that:</p> <ul style="list-style-type: none"> • There are no acute risk issues of concern for health issues related to air quality and inhalation, deposition or multiple pathway exposures • Chronic and incremental carcinogenic risks are negligible and essentially representative of zero risk. <p>Proper operation and maintenance, and monitoring of the pollution control/flue gas equipment are measures that will be implemented to mitigate any potential negative impacts.</p>	See Appendix D Air Quality Impact Assessment See Appendix F Health Impact Assessment												
Lack of an Environmental Effects Statement prepared. Section 3.1 of the Works Submissions says that it is not required?!	6	EPA to ensure that an EES is triggered/requested	• Why do they consider an EES is not required?	<p>PHI reviewed the need for referral for an Environment Effects Statement (EES) for the project, in accordance with the "Ministerial guidelines for assessment of environmental effects under the <i>Environment Effects Act 1978</i>". In the guidelines, there is a list of referral criteria which is used to help determine if a project would need an EES. Most of the criteria relate to potential effects on native vegetation, threatened flora/fauna species, ecological impacts and there is a criterion for health effects and one for greenhouse gas emissions.</p> <p>PHI engaged with the Department of Environment, Land, Water and Planning (DELWP) to see whether the project would require a referral for an EES. Advice from DELWP was that since the project did not trigger any of the criteria, a referral was not required. Note that one of the criteria is potential greenhouse gas emissions exceeding 200,000 tonnes of CO_{2-e} per annum. The project's gross GHG emissions were tabulated as ~192,000 tpa CO_{2-e}, however this figure does not include the GHG savings due to diversion of waste from landfill. The project will have a net reduction in GHG emissions of ~300,000 tpa CO_{2-e}. Thus the project did not require referral for an EES.</p> <p>It is important to note that even if a criterion is triggered, it does not necessarily mean that the project would require an EES.</p>	Please refer to: https://www.planning.vic.gov.au/__data/assets/pdf_file/0/026/95237/DSE097_EES_FA.pdf												
Release of trapped carbon from plastics that will not decompose	1	Refusal of permit	• What does the proposal reduce carbon overall when some materials would retain indefinitely?	<p>The Greenhouse Gas Assessment demonstrates that the installation of the EfW Plant will have a net reduction in GHG emissions. Although the project will have direct operational emissions of approximately 194,000 tonnes CO_{2-e} per year, the net benefit (emissions that will be avoided) of the project, is approximately 315,000 tonnes CO_{2-e} per year. In other words, PHI's EfW plant will reduce the state's greenhouse gas emissions by approximately 315,000 tonnes CO_{2-e} per year.</p> <table border="1"> <thead> <tr> <th>Emissions type</th> <th>GHG emissions generated (tonnes CO_{2-e})</th> <th>GHG emissions avoided/saved (tonnes CO_{2-e})</th> </tr> </thead> <tbody> <tr> <td>EfW plant operational emissions</td> <td>192,034</td> <td></td> </tr> <tr> <td>Transport emissions</td> <td>2,500</td> <td></td> </tr> <tr> <td>Emissions offset from displaced electricity</td> <td></td> <td>209,359</td> </tr> </tbody> </table>	Emissions type	GHG emissions generated (tonnes CO _{2-e})	GHG emissions avoided/saved (tonnes CO _{2-e})	EfW plant operational emissions	192,034		Transport emissions	2,500		Emissions offset from displaced electricity		209,359	See Appendix C Greenhouse Gas Assessment
Emissions type	GHG emissions generated (tonnes CO _{2-e})	GHG emissions avoided/saved (tonnes CO _{2-e})															
EfW plant operational emissions	192,034																
Transport emissions	2,500																
Emissions offset from displaced electricity		209,359															

				<table border="1"> <tr> <td>Emissions offset from avoided landfill emissions</td> <td>300,051</td> </tr> <tr> <td>Total operational emissions (net benefit)</td> <td>314,876 tCO_{2-e} avoided/saved per annum</td> </tr> </table> <p>The Assessment included calculations of emissions from all materials, including plastics.</p>	Emissions offset from avoided landfill emissions	300,051	Total operational emissions (net benefit)	314,876 tCO _{2-e} avoided/saved per annum	
Emissions offset from avoided landfill emissions	300,051								
Total operational emissions (net benefit)	314,876 tCO _{2-e} avoided/saved per annum								
Odour!	-	-	<ul style="list-style-type: none"> • Who will monitor it? • How will results be published? • Will they wait for complaints? • Who do we go to for complaints? 	<p>The main source of odour from the EfW plant will be the tipping hall and waste bunker, which are the areas that will receive waste. These areas will be fully indoors and will be where the waste trucks will unload the waste. The tipping hall and waste bunker will be fitted with fast-action roller doors that will open and close when trucks enter and exit the building. To control fugitive emissions, the tipping hall and waste bunker will be maintained under negative air pressure, continuously controlling odour emissions whilst one of the boilers is operational. In other words, outside air is drawn into the building, so air from inside the building (and associated odour) will not escape outside.</p> <p>Odour monitoring will be conducted as part of the standard environmental management for the operations. There will be a phone number and email address for members of the public to contact the company for any queries, questions or complaints.</p> <p>Energy from waste facilities around the world have demonstrated that odour is managed successfully without adverse impacts on surrounding residents or other neighbours. A good example is the Amager Bakke EfW plant in Copenhagen, Denmark. This facility has a grass skiing area on its roof as well as a restaurant and café, clearly demonstrating that these plants can be operated without odour and amenity impacts.</p>	<p>See Section 4 of the Works Approval Application report</p> <p>https://www.copenhill.dk/aktiviteter/caffe-afterski</p> <p>https://www.rte.ie/news/news-slens/2019/0216/1030915-copenhagen/</p>				
Technology description too general with options too vague (a "trust me" approach)	1	Specific equipment and process to be defined to inform EPA	-	<p>The Works Approval Application report provides detailed descriptions and explanations of the technology, concept design and project implementation processes for the project. The specific plant and equipment to use in the EfW facility will be refined as the detailed design is progressed. It is expected that if EPA grants approval, the approval conditions will stipulate conditions to ensure that any changes made during detailed design will have to meet the overall approval conditions and will need to be reviewed and approved by EPA.</p>	See Section 7 of the Works Approval Application report				
Does the EPA recognise/acknowledge we are in a climate and ecological emergency (as the context for the decision)? We are NOT dealing with the cause!	2	Full environmental study (emissions and ecology) Look at opportunities to draw down carbon	-	<p>At the heart of this project is the diversion of residual waste from landfills and a large reduction in Victoria's greenhouse gas emissions. In the absence of energy from waste projects, residual waste would continue to be dumped in landfills, compounding a wide range of existing environmental problems such as greenhouse gas emissions, groundwater contamination, soil contamination and amenity issues (dust, odour, traffic, visual). EfW projects present an alternative opportunity where improvements to the environment and climate change can be made, while society transitions to a zero waste future. As an example, PHI's EfW project will reduce GHG emissions from landfills by approximately 300,000 tonnes of CO_{2-e} per annum – so for every year that the PHI EfW project is not in operation, these significant GHG emissions will be released to the atmosphere (equivalent to 60,000 cars on our roads).</p>	See Appendix C Greenhouse Gas Assessment				
It is not all residential waste [80% from residential]	-	-	<ul style="list-style-type: none"> • What is the industrial/commercial waste? • Where does the industrial and commercial waste come from? 	<p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc.</p> <p>With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting residual waste that would otherwise go to landfill.</p>	See Section 1.6 and 1.7 of the Works Approval Application report				
There will be an increase in air pollution in Lara (despite apparent reduction)	5	Find a different location	-	<p>There are many factors that influence the selection of a suitable site for an energy from waste plant. During the feasibility stage of this project we assessed several potential project sites using the following key criteria:</p> <ul style="list-style-type: none"> • zoning of the land, • road access, • availability of services, • site readiness • potential social and environmental impacts. <p>The selected project site in Lara scored well on all criteria. The key factors that make the Lara site suitable for this project are:</p> <ul style="list-style-type: none"> • The site is located within the Geelong Ring Road Employment Precinct (GREP). The GREP is Geelong's largest designated industrial development precinct and includes over 500 hectares of land zoned for heavy industrial 	<p>Please refer to the Prospect Hill International website for examples of EfW plants located very close to large residential areas: https://prospecthill.com.au/</p> <p>See Appendix D Air Quality Impact Assessment See Appendix F Health Impact Assessment</p>				

				<p>purposes.</p> <ul style="list-style-type: none"> The site is located within an industrial planning zone (Industrial 2 Zone or "IN2Z") which is designated for large industrial purposes like an energy from waste plant. Under the planning scheme, one of the purposes of the IN2Z is "To provide for manufacturing industry, the storage and distribution of goods and associated facilities". Geelong and the surrounding region have suffered from the closure of large manufacturing plants over recent years. Prospect Hill International sees this project as an opportunity to bring back some of those skilled jobs to the area and hopes to employ people who may have been impacted by skilled job losses in recent years. The site is located close to potential waste sources, including Geelong, the Surf Coast and Bellarine as well as the growing region of western Melbourne. The site has good transport links, being close to the Princes Freeway and Geelong Bypass. Trucks that transport waste to the plant will be able to access the site through roads in the industrial zone and not have to travel on residential streets. <p>Experience with these types of plants around the world shows that they have very low amenity impacts to surrounding communities. There are many examples of EfW plants being located within tens or hundreds of metres of large residential populations (tens of thousands of people), such as London, Paris, Tokyo, Zurich and Vienna. Modern energy from waste plants include sophisticated measures to minimise impacts on surrounding communities, like noise reduction and sound proofing design elements, state-of-the-art air emissions controls and advanced odour controls.</p>	
No emission reference plants (China)	1	Provide data from the plants used in China	-	<p>The Works Approval Application report provides detailed descriptions and explanations of the technology, concept design and project implementation processes for the project. The report also provides relevant reference plant data for comparison to the proposed project. The reference plants used in the report compare EfW facilities in the UK – this is because the waste composition of household waste in the UK is similar to the composition of Australian/Victorian household waste. Household waste in China is quite different to UK and Australia/Victorian waste – Chinese waste has a lower calorific value, higher moisture content and higher organic content. Since the technology and equipment for moving grate EfW plants is similar around the world, it was better to use reference plants on the basis of similar waste, rather than origin of manufacture.</p>	See Section 7 of the Works Approval Application report
Composition of emissions will be different over time - current models will be wrong	3	On-going independent monitoring process in place	• What controls will be in place to control the inputs?	<p>The waste to be accepted by the facility will consist of Metropolitan Solid Waste (MSW) and Commercial & Industrial (C&I) waste. It is acknowledged that the waste composition of MSW and C&I is likely to change over time. Changes in feedstock composition have been modelled to review impacts on projected waste tonnes given changes to waste collection systems and changes to mass flow due to different waste service compositions and varying proportions of waste provided by individual councils.</p> <p>Scenarios modelled include the roll out of food and garden organics collections, the introduction of a container deposit scheme and improvements to recycling. Expected outcomes of such changes have been (and continue to be) reviewed. PHI has incorporated the outputs of this modelling into its business planning so that it is aware that it will need to manage and monitor these changes in the future, and adapt as required.</p> <p>Furthermore, the EfW plant is designed to accommodate these changes and to operate at a range of calorific value and waste throughputs. The EfW Plant is designed to operate under a range of feedstock calorific values, inert content and moisture content.</p>	See Section 7.4 of the Works Approval Application report
References don't comply to NOx → no controls on radioactivity	-	Control radio material Include a gantry over way bridge	-	<p>The only potential sources of radioactivity that could emanate from household waste are smoke detectors. Some domestic smoke detectors contain a radioactive source (americium-241), however this radiation source is about 3,000 times less than the radiation dose from natural background radiation (https://www2.health.vic.gov.au/Api/downloadmedia/%7BF2A96E0-CA0D-46B5-81DD-9D02C895A896%7D#:text=The%20risk%20of%20harm%20from,the%20chamber%20of%20the%20detector).</p> <p>Prospect Hill International will implement a waste delivery protocol that will involve a range of measures to assess if waste meets the plant's acceptance standards. If there are smoke detectors in the waste stream, they will be removed and sent to smoke detector suppliers for recycling (in accordance with DHHS guidance). If a smoke detector is not observed in the waste stream and ends up being processed in the EfW process, it is expected that the impact will be negligible, due to the very low dose of radiation in a smoke detector.</p> <p>The Air Quality Assessment demonstrates that there is a low risk of air quality impact from the project's emissions. The assessment shows that the emissions of all substances from the EfW Plant will meet all EU IED (European Union - Industrial Emissions Directive) and EPA emission limits. The assessment also shows that the EfW Plant emissions will meet all ground level concentration design criteria for all substances, as specified in EPA requirements. This includes</p>	See Appendix D Air Quality Impact Assessment

				emissions of nitrogen oxides (NOx).	
Impact on bird life → pollution of air quality	2	Locate the plant elsewhere- important wetlands at Avalon The You Youngs	Filters?	<p>With regard to biodiversity at the proposed EfW site, a Flora and Fauna Assessment was conducted of the site and found that the site did not contain any flora and fauna values. It was found that the site had been cleared in the past for other activities (farming) and no ecological values remain.</p> <p>With regard to potential flora and fauna impacts of emissions from the operating plant, the concentration of bioaccumulative pollutants in animals and plants was calculated and concluded to be of negligible risk. The air pollution controls systems contain large bag filters to filter the exhaust gases prior to emission from the stack.</p> <p>Nearly all plant and equipment at the site will be housed within enclosed buildings, so the risk of injury to animals is extremely low. The site will be similar in building form to other industrial premises currently operating in the Geelong Ring Road Employment Precinct (GREP) – such as Rocke Transport, SNF chemical manufacturing plant, CivilMart, Clariant Specialty Chemicals manufacturing plant, Geelong Galvanizing and Thorton Steel Fabrication.</p>	See Appendix H Flora and Fauna Assessment See Appendix F Health Impact Assessment
What emission standard does the plant have to meet	-	Answer these Questions	<ul style="list-style-type: none"> • Australia does not have a carbon tax. Will the plant meet the same standards as Europe? • Can you tell me the regulation so I can research? <p>The EU emission standards are getting exponentially stricter.</p> <ul style="list-style-type: none"> • Will the EU still be using WTE as emission standards tighten? • How will this plant meet future Australian Emission Standards? 	<p>The Air Quality Assessment demonstrates that there is a low risk of air quality impact from the project's emissions. The assessment shows that the emissions of all substances from the EfW Plant will meet all EU IED (European Union - Industrial Emissions Directive) and EPA emission limits. The assessment also shows that the EfW Plant emissions will meet all ground level concentration design criteria for all substances, as specified in EPA requirements. So the project will meet EU standards and Victorian standards.</p> <p>The EU standards (EU IED (European Union - Industrial Emissions Directive 2010/75/EU)) can be found here: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010L0075</p> <p>The EU Best Available Technology Reference document for Waste Incineration (WI BREF) can be found here: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3A0J.L_.2019.312.01.0055.01.ENG&toc=OJ%3AL%3A2019%3A312%3ATOC</p> <p>The EPA Victoria Energy from Waste Guideline can be found here: https://www.epa.vic.gov.au/about-epa/publications/1559-1</p> <p>It is likely that emissions standards (both EU and Victorian) will tighten in the future. The plant has been designed to allow for plant and equipment items to be upgraded where necessary. For example, the air pollution controls (APC) system will be fitted with a continuous emissions monitoring system (CEMS) which will monitor the performance of the control system and the emissions from the plant. The CEMS unit can be removed, upgraded and re-installed at a time in the future where standards are tightened or when monitoring technology improves.</p>	See Appendix D Air Quality Impact Assessment
Travel of pollutions	1	implies higher pollution land that required disposition	<ul style="list-style-type: none"> • How far can pollution travel on high wind days? 	<p>The Air Quality Assessment demonstrates that there is a low risk of air quality impact from the project's emissions. The assessment shows that the emissions of all substances from the EfW Plant will meet all EU IED (European Union - Industrial Emissions Directive) and EPA emission limits. The assessment also shows that the EfW Plant emissions will meet all ground level concentration design criteria for all substances, as specified in EPA requirements.</p> <p>The Air Quality Assessment provides very detailed information on the modelling and results. In section 6 there are modelling plots which show the ground level concentrations of each of the key pollutants modelled. The key pollutants are nitrogen dioxide (NO2) and particulate matter (PM10 and PM2.5). The assessment shows that the levels of NO2, PM10 and PM2.5 at the nearest residence are well below the EPA limits. For example, the PM10 plot below shows that the level of PM10 at ground level at the nearest residence will be below 4 ug/m3, where the EPA limit is 80 ug/m3. For each of the pollutants modelled, the assessment shows the emissions from the project will be meet the EU IED and EPA standards.</p> <p>With regard to high wind days, high wind conditions are more conducive to the dispersion of pollutants meaning that potential pollutants in the stack exhaust would be much less likely to fall to ground.</p> <p>A comprehensive Health Impact Assessment (HIA) was conducted and the assessment considered potential impacts from pollutants and impacts related to air emissions, odours, noise, economics, waste and transport. Multiple exposure pathways relevant to both adults and children were assessed and the risks have been calculated on the basis of the maximum predicted deposition rate for all of the sensitive receptors in the surrounding community. As a result, this approach is representative of the maximum impacted rural residential location and provides a conservative estimation of risks relevant to other rural residential and urban residential areas.</p>	See Appendix D Air Quality Impact Assessment See Appendix F Health Impact Assessment

				<p>The HIA found the risk of potential health impacts on the community would be low to negligible. The health impact assessment considered potential impacts due to air emissions, noise and particulate deposition (i.e. where particulates may deposit on to pasture or soils and be ingested by human or animals). The HIA concluded that:</p> <ul style="list-style-type: none"> • There are no acute risk issues of concern for health issues related to air quality and inhalation, deposition or multiple pathway exposures • Chronic and incremental carcinogenic risks are negligible and essentially representative of zero risk. <p>Proper operation and maintenance, and monitoring of the pollution control/flue gas equipment are measures that will be implemented to mitigate any potential negative impacts.</p>	
Capire Report, section 2.7 Traffic and logistics					
Enforcing truck routes	3	Trucks from Melbourne use Lara already Suggestion: should be in contracts with transport companies	<ul style="list-style-type: none"> • Who does this? • Current experience is trucks already cut through Lara • What sizes are the trucks? 	<p>The use of trucks on roads is enforced by VicRoads and councils. The project is ideally located within the Geelong Ring Road Employment Precinct (GREP), which has been planned by council to allow for large industrial development to facilitate economic growth. The GREP has also been designed to utilise existing excellent road transport routes and to avoid residential roads.</p> <p>The project is located close to major transport routes in the Greater Geelong region, meaning traffic can avoid small local roads during construction and operations.</p> <p>The key transport routes from Melbourne to the site are anticipated to be:</p> <ul style="list-style-type: none"> • Princes Freeway, Geelong CBD exit, Broderick Rd, Production Way • Princes Freeway, Geelong Ring Rd, Bacchus Marsh Rd, Heales Rd, Broderick Rd, Production Way <p>From the Geelong direction the transport route is anticipated to be:</p> <ul style="list-style-type: none"> • Princes Highway, Bacchus Marsh Rd, Heales Rd, Broderick Rd, Production Way <p>During the operational phase of the project, there will be a mix of trucks used, including</p> <ul style="list-style-type: none"> • 200,000 tpa (i.e. 50% of all waste) is delivered by 26m B-double bulk haul vehicles • 100,000 tpa (i.e. 25% of all waste) is delivered by 19m semi-trailer bulk haul vehicles • 100,000 tpa (i.e. 25% of all waste) is delivered by collection compactors (Refuse Collection Vehicles or RCVs) 	See Appendix K Traffic Impact Assessment
Feedstock ability - given council's zero-waste policy and construction of similar facility in Laverton	3	Confirmation of what would happen in this case, not wanting to see new or riskier feedstock introduced	<ul style="list-style-type: none"> • What is the business case? • What would stop new or riskier waste streams being received? 	<p>A business case as per the Department of Treasury and Finance (DTF) guidance is only required for public/government projects funded, delivered or overseen by government departments or agencies. PHI's EfW project is privately funded and for private sector projects using private funding it is extremely rare for a business plan/case to be released publicly. This is because the business plan/case contains commercially sensitive information that can be used by competitors to gain undue advantage. It would be like going to a house auction and telling everyone what your highest bid would be.</p> <p>PHI is aware of the waste stockpile issue at 300-400 Broderick Rd, where the operator of the site abandoned almost 300,000 m³ of waste which has been left to EPA Victoria to manage and clean up. As a result of this concern, PHI is considering whether to release a business plan or business case to the public. PHI will provide further details in the next few weeks.</p> <p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc.</p> <p>With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting residual waste that would otherwise go to landfill.</p> <p>PHI expects that if an approval is granted by EPA, the approval will have conditions about the types of waste that could be accepted by the project – and that only MSW and MSW-like waste will be accepted. Changing the types of waste that can be utilised in the plant will likely require further approval from EPA.</p> <p>It should also be noted that the plant is being designed for MSW waste. Other waste feedstocks such as heavy industrial waste would not be suitable for the plant and could cause damage. Recyclables are not desirable in the waste streams as they have a higher calorific value. Thus only MSW and MSW-like residual waste is being targeted.</p>	See Section 8 of the Works Approval Application report
Statistics shown were 2017 and didn't show current trend to phase out post-2019 standards	-	-	<ul style="list-style-type: none"> • If Geelong Council doesn't want to use it, why build it here? 	<p>The statistics shown during the Conference presentation were based on the latest available data from the Victorian government. More recent government statistics are not available, but the trends in the data from previous years is clear – the amount of waste and recyclable generation is proportionate to the growth in population. Although population growth has stalled due to COVID-19, it is expected to grow strongly again once national and state borders</p>	

				<p>are relaxed.</p> <p>The key factors that make the Lara site suitable for this project are:</p> <ul style="list-style-type: none"> • The site is located within the Geelong Ring Road Employment Precinct (GREP). The GREP is Geelong's largest designated industrial development precinct and includes over 500 hectares of land zoned for heavy industrial purposes. • The site is located within an industrial planning zone (Industrial 2 Zone or "IN2Z") which is designated for large industrial purposes like an energy from waste plant. Under the planning scheme, one of the purposes of the IN2Z is "To provide for manufacturing industry, the storage and distribution of goods and associated facilities". • Geelong and the surrounding region have suffered from the closure of large manufacturing plants over recent years. Prospect Hill International sees this project as an opportunity to bring back some of those skilled jobs to the area and hopes to employ people who may have been impacted by skilled job losses in recent years. • The site is located close to potential waste sources, including Geelong, the Surf Coast and Bellarine as well as the growing region of western Melbourne. • The site has good transport links, being close to the Princes Freeway and Geelong Bypass. • Trucks that transport waste to the plant will be able to access the site through roads in the industrial zone and not have to travel on residential streets. 	
Hours of operation – trucks - plant itself	2	Clarify of hours for both trucks and operation. Scheduling to avoid stockpile	<ul style="list-style-type: none"> • What is the maximum storage at any time? • Is it all enclosed (not outside)? 	<p>In the operations phase, the EfW plant will operate on a 24 hour basis. There will be times when either boiler lines are shutdown for maintenance and rare occasions when both boiler lines are shutdown for maintenance. It is expected that the EfW plant will operate for over 90% of the time annually, which is roughly over 8,000 hours per year. Trucks are expected to operate predominantly during normal business when waste collections normally occur – typically from 6am to 6pm. This is because municipal waste collection and the operation of transfer stations/landfills is during normal business hours. There may be times when trucks transfer waste to the plant outside of these times, however it is expected that these occasions will be unusual.</p> <p>The waste bunker is being designed to hold around 5-7 days of waste collections. The waste bunker and tipping hall will be fully indoors and be operated under negative air pressure, continuously controlling odour emissions through the boilers. In other words, outside air is drawn into the building, so air from inside the building (and associated odour) will not escape outside.</p>	
2.5ML of potable water per day Barwon Water says old wasteful process	-	-	<ul style="list-style-type: none"> • Is there adequate supply? 	<p>PHI has reached out to Barwon Water to discuss the project since July 2020. In that time, we have been corresponding with Barwon Water numerous times and we have also held a virtual meeting with numerous Barwon Water personnel.</p> <p>In our interactions to date, the possibility of alternative water sources has been raised and discussed (e.g. recycled water). PHI is very open to the possibility of using alternative water sources besides potable water. We intend to continue engagement with Barwon Water as the project progresses through the design.</p> <p>The water mains would be connected at a local level as there is an existing water main within metres of the site.</p>	
Is the network ready to take the energy?	-	-	<ul style="list-style-type: none"> • Is there an agreement with Powercor? 	<p>The local electricity network has the capacity to take the electricity generated by the EfW plant. At present, there is no agreement with Powercor to take the electricity – discussions with Powercor will take place during the detailed design phase.</p>	
Trucks from Melbourne will be going past Aldi - a high volume traffic area at times	-	Reconsider truck route	-	<p>A Traffic Impact Assessment was conducted and concluded that the project will have minimal midblock impacts and minimal impacts on traffic volume. Prior to construction, PHI will prepare a Traffic Management Plan in coordination with the City of Greater Geelong and Department of Transport. This plan will govern all project traffic during construction.</p>	
Capire Report, section 2.8 Miscellaneous					
Never heard when we could make a submission to EPA. Communication from EPA to Lara public has been poor.	1	-	-	<p>Prospect Hill International is committed to engaging with the community by answering your questions and getting your feedback about the project throughout its development. However, considering that greater Melbourne has been under Lockdown for over 200 days in the past year, it has been extremely difficult to engage face-to-face with the local community as was initially planned. Also, for the remainder of the past year where we have not been under Lockdown, there have been severe restrictions on public gatherings, which has meant that face-to-face consultation has been untenable.</p> <p>As a result, PHI has established a website, phone line and email to field any questions from the community. PHI has also held two online information sessions (28 July 2020, 20 April 2021) and one face-to-face information session</p>	

				<p>(13 July 2021). In addition, there was a public consultation period between 21 March 2021 and 28 April 2021 run by EPA. The EPA also held a 20B conference after the public submission period in order to:</p> <ul style="list-style-type: none"> • Enable EPA to listen to, and better understand the views and concerns of the community and stakeholders • Help explain the Works Approval Application, the assessment process, and its current status • Discuss ideas about possible conditions of the works approval is issued. <p>This conference was independently chaired and a report prepared to report detailed community concerns and recommendations for EPA to consider as part of its assessment.</p> <p>It should also be noted that all of the above sessions had been postponed due to Lockdowns and COVID restrictions, where the actual date of the sessions referred to above had been pushed back.</p> <p>PHI is looking for additional opportunities to continue engagement with the community, preferably in a face-to-face environment. As greater Melbourne is in another Lockdown, we will need to wait for restrictions to ease. In the meantime, PHI has continued engagement with a number of interested parties (via phone calls and online meetings).</p>	
Geelong City Council has recently completed a flood probability study.	2	Response to concern Protection of local residential areas and wildlife reserves and waterway	<ul style="list-style-type: none"> • Is the site flood prone and if so what is the mitigation strategy? 	The site is not located in a flood prone zone, known as a Land Subject to Inundation & Floodway Overlay (LSIO) in the planning scheme.	
The site also needs a work approval, it falls under the A08 waste to energy It also needs 'A' license to operate the facility.	1	-	<ul style="list-style-type: none"> • How is the power getting into the grid? 	<p>The EPA categorises the EFW project as scheduled categories A08 (Waste to Energy) and K01 (Power Stations).</p> <p>To export electricity from the EFW plant to the grid will require an electricity connection utilising powerlines. This is likely to be in the form of 11kV or 22kV power lines, which could be strung from the existing powerlines in the area (e.g. along McManus Rd or Production Way). Discussions will be held with Powercor during the detailed design phase to confirm export requirements and associated infrastructure.</p>	
How many subcontractors are part of the construction?	-	Clear and concise list of who is doing what	<ul style="list-style-type: none"> • Once works are completed by these subcontractors who is going to hold them accountable? Ie. Pop up RTO, popup companies, collapsed solar companies 	<p>The construction contractors proposed for the project have not been determined yet. This will occur towards the end of the detailed design phase.</p> <p>PHI hopes to use local subcontractors as much as possible for the construction of the project. Ultimately, PHI will be responsible for the whole project and will be held accountable for meeting any conditions of approvals.</p>	
Once energy is made, how is it getting back to grid?	5	No more powerlines wanted or needed	<ul style="list-style-type: none"> • What are the current discussions/arrangements with Powercor or industrial facilities to use the power 	To export electricity from the EFW plant to the grid will require an electricity connection utilising powerlines. This is likely to be in the form of 11kV or 22kV power lines, which could be strung from the existing powerlines in the area (e.g. along McManus Rd or Production Way). Discussions will be held with Powercor during the detailed design phase to confirm export requirements and associated infrastructure.	
An incinerator that lasts 20 years is not a sustainable answer to our waste problem	2	-	<ul style="list-style-type: none"> • What happens in 20 years to an old out of date plant? • What's the plan for updating? 	The design life of the EFW plant is 25 years. A decision on whether to continue operations or whether to cease operations and decommission will be made closer to the end of the design life. If it is decided to cease operations, the plant will be decommissioned in a manner appropriate to the regulations at that time (i.e. appropriate reuse, recycling and disposal of plant). If it is decided to continue operating, the plant will be upgraded if required. It should be noted that at all times, PHI will operate and maintain the plant in accordance with best practice and the standards and regulations of the time. This includes any tightening of standards from now.	
The Goulbourn Valley has zinc 10 to 15 % higher than anywhere else in the state	1	-	-	We are sorry but we do not know what this comment means.	
The Monash University is currently in its 5 th or 6 th year of a case study of long-term effects after the power plant caught on fire and burned for several months. Still don't have all effects recorded.	-	-	<ul style="list-style-type: none"> • What if this goes up in flames? • What are the predicted hours/weeks/months to extinguish? • What materials other than rubbish will our community be exposed to? 	Like all industrial facilities, including the numerous industrial facilities that already exist in the GREP (such as Rocke Transport, SNF chemical manufacturing plant, CivilMart, Clariant Specialty Chemicals manufacturing plant, Geelong Galvanizing, Thorton Steel Fabrication), the EFW plant will be fitted with a fire protection system. The system will be designed and constructed in accordance with strict Australian Standards and building codes.	
Light pollution has not been disclosed but is a	1	Define and disclose minimum acceptable	<ul style="list-style-type: none"> • What has been observed in previous development (regarding 	The site is located within the Geelong Ring Road Employment Precinct (GREP). The GREP is Geelong's largest designated industrial development precinct and includes over 500 hectares of land zoned for heavy industrial	

key factor in a 'country' setting.		variance and recourse when not met	light pollution) and what is considered an acceptable level?	<p>purposes. The site is located within an industrial planning zone (Industrial 2 Zone or "IN2Z") which is designated for large industrial purposes like an energy from waste plant. Under the planning scheme, one of the purposes of the IN2Z is "To provide for manufacturing industry, the storage and distribution of goods and associated facilities".</p> <p>The facility would be designed to mitigate the potential for light pollution, meeting Australian Standard AS/NZS4282:2019 – Control of the obtrusive effects of outdoor lighting. Lighting details will be finalised during the detailed design phase of the project in accordance with DELWP planning requirements.</p>	
Misinformation about jobs. This is an automated plant. Jobs are mostly only in construction.	-	Disclose how many ongoing jobs.	<ul style="list-style-type: none"> • How many ongoing new jobs for Geelong? Excluding rubbish truck drivers. • There would be many more jobs in a recycling plant so why not do this instead? 	Prospect Hill International wants to regenerate employment opportunities in the industrial sector. Geelong and the surrounding region have suffered from the closure of large manufacturing plants over recent years. PHI sees this project as an opportunity to bring back some of those skilled jobs to the area and hopes to employ people who may have been impacted by skilled job losses in recent years. The project will create hundreds of new jobs during construction and more than 30 jobs during operation (excluding employment for truck and transport).	
Insufficient opportunity for written submissions/having a say - most people don't know about this - not enough people in this meeting - poorly advertised - zoom was not accessible for many residents - future residents in a growth corridor will be affected, not enough wider publicity	1	Take out a full-page advertisement in the Geelong Advertiser seeking further submissions	-	<p>Prospect Hill International is committed to engaging with the community by answering your questions and getting your feedback about the project throughout its development. However, considering that greater Melbourne has been under Lockdown for over 200 days in the past year, it has been extremely difficult to engage face-to-face with the local community as was initially planned. Also, for the remainder of the past year where we have not been under Lockdown, there have been severe restrictions on public gatherings, which has meant that face-to-face consultation has been untenable.</p> <p>As a result, PHI has established a website, phone line and email to field any questions from the community. PHI has also held two online information sessions (28 July 2020, 20 April 2021) and one face-to-face information session (13 July 2021). In addition, there was a public consultation period between 21 March 2021 and 28 April 2021 run by EPA. The EPA also held a 2OB conference after the public submission period in order to:</p> <ul style="list-style-type: none"> • Enable EPA to listen to, and better understand the views and concerns of the community and stakeholders • Help explain the Works Approval Application, the assessment process, and its current status • Discuss ideas about possible conditions of the works approval is issued. <p>This conference was independently chaired and a report prepared to report detailed community concerns and recommendations for EPA to consider as part of its assessment.</p> <p>It should also be noted that all of the above sessions had been postponed due to Lockdowns and COVID restrictions, where the actual date of the sessions referred to above had been pushed back.</p> <p>PHI is looking for additional opportunities to continue engagement with the community, preferably in a face-to-face environment. As greater Melbourne is in another Lockdown, we will need to wait for restrictions to ease. In the meantime, PHI has continued engagement with a number of interested parties (via phone calls and online meetings). PHI has also taken out advertisements in the Geelong Advertiser highlighting the approvals applications.</p>	
House pricing decrease! This plant generates voices in favour and against, as well as many people unsure about the effects to health and wellbeing for the community. This will lead to a reduction of demand of houses and an increase in supply. Therefore, this will ultimately lead to a decrease in the value of our houses. Simple supply and demand laws. worries about house drive impact	4	-	<ul style="list-style-type: none"> • Is Bisinella Land Developer responsible for allowing residential development so close to industrial zone 2/in a better zone? 	<p>PHI is not aware of residential development by Bisinella.</p> <p>With regard to potential effects on health, a comprehensive Health Impact Assessment (HIA) was conducted and the assessment considered potential impacts from pollutants and impacts related to air emissions, odours, noise, economics, waste and transport. Multiple exposure pathways relevant to both adults and children were assessed and the risks have been calculated on the basis of the maximum predicted deposition rate for all of the sensitive receptors in the surrounding community. As a result, this approach is representative of the maximum impacted rural residential location and provides a conservative estimation of risks relevant to other rural residential and urban residential areas.</p> <p>The HIA found the risk of potential health impacts on the community would be low to negligible. The health impact assessment considered potential impacts due to air emissions, noise and particulate deposition (i.e. where particulates may deposit on to pasture or soils and be ingested by human or animals). The HIA concluded that:</p> <ul style="list-style-type: none"> • There are no acute risk issues of concern for health issues related to air quality and inhalation, deposition or multiple pathway exposures • Chronic and incremental carcinogenic risks are negligible and essentially representative of zero risk. 	See Appendix F Health Impact Assessment

Stack height- 80m high!! Visual disturbance of landscape! Aesthetics	3	Build a smaller stack	• Why does it have to be so high if it is so clean?	<p>A Landscape and Visual Impact Assessment was conducted for the project. The assessment concluded that these types of planning zones (Industrial 2 Zone) are not considered as being visually sensitive. As the Project is immediately surrounded by cleared farmland and industrial areas, most views toward the site are not considered to be visually sensitive as the landscape is already highly disturbed. Some views, like those close to residential areas and public parks/reserves, may be more visually sensitive. Views are varied, with topography and existing screening/vegetation being the main determinant of whether or not a residence or reserve affords a clear view towards the Project site. Views of the Project from recreational reserves within the study area were assessed to be Low.</p> <p>The project site is subject to the Design Development Overlay (Schedule 18 – Geelong Ring Road Employment Precinct) DDO18. This DDO18 facilitates developments in the IN2Z to provide a high level of amenity for workers and visitors to the estate and to contribute to the amenity of the GREP. The EfW plant has been designed with soft and smooth architectural features to provide an aesthetically pleasing form for people and to also adhere to DDO18.</p> <p>In addition, the project will have numerous mitigation measures to ameliorate visual impact from surrounding sensitive areas, primarily from applying different materials and colours to assist in breaking up the bulk of the built form. The proposed building form is similar to that of an indoor sporting complex such as a basketball or gymnasium centre. Thus the design of the facility can transition the appearance of the industrial zone (where there are no restrictions of height, scale or built form – subject to DDO18) with the surrounding rural residential zone. It will have a more modern and muted appearance compared to the nearby Elgas facility and other buildings/facilities that have been developed in the IN2Z in the past.</p> <p>The highest feature of the facility will be the exhaust stack, which will be 80 metres tall. This is similar to other industrial stacks in proximity to the project, such as the Viva refinery and Incitec Pivot plant which have stacks of around 70-80 metres.</p> <p>The assessment also assessed potential visual impacts related to the You Yangs. The You Yangs Regional Park is a dominant landscape feature within the broader region. The peak of the landform provides panoramic views of Greater Geelong, including views of the GREP area through breaks in vegetation. Views from the peak already overlook a highly disturbed landscape, including other industrial infrastructure such as the Viva Refinery, Corio port and 220kV transmission line. As a result, the predicted visual impact from the Project on this site has been assessed to be Low-Negligible.</p>	
Chernobyl was not considered safe!	-	-	-	EfW plants like the one being proposed by PHI have been operating very safely in Europe and around the world for many decades. The PHI EfW project is being designed using off-the-shelf Moving Grate technology that has a proven track record of reliability and compliance from over 500 such plants around the world and many decades of operations. The design will be considered best practice in accordance with European and Victorian regulations.	
Capire Report, section 4 Observations and recommendations					
Undertake further community engagement providing responses to key community concerns. The engagement process should report how concerns are addressed in the proposal.				<p>Prospect Hill International is committed to engaging with the community by answering your questions and getting your feedback about the project throughout its development. However, considering that greater Melbourne has been under Lockdown for over 200 days in the past year, it has been extremely difficult to engage face-to-face with the local community as was initially planned. Also, for the remainder of the past year where we have not been under Lockdown, there have been severe restrictions on public gatherings, which has meant that face-to-face consultation has been untenable.</p> <p>As a result, PHI has established a website, phone line and email to field any questions from the community. PHI has also held two online information sessions (28 July 2020, 20 April 2021) and one face-to-face information session (13 July 2021). In addition, there was a public consultation period between 21 March 2021 and 28 April 2021 run by EPA. The EPA also held a 2OB conference after the public submission period in order to:</p> <ul style="list-style-type: none"> • Enable EPA to listen to, and better understand the views and concerns of the community and stakeholders • Help explain the Works Approval Application, the assessment process, and its current status • Discuss ideas about possible conditions of the works approval is issued. <p>This conference was independently chaired and a report prepared to report detailed community concerns and recommendations for EPA to consider as part of its assessment.</p> <p>It should also be noted that all of the above sessions had been postponed due to Lockdowns and COVID restrictions, where the actual date of the sessions referred to above had been pushed back.</p> <p>PHI is looking for additional opportunities to continue engagement with the community, preferably in a face-to-face</p>	

				environment. As greater Melbourne is in another Lockdown, we will need to wait for restrictions to ease. In the meantime, PHI has continued engagement with a number of interested parties (via phone calls and online meetings).	
Provide clear reasons for the chosen location and why other locations were not proposed				<p>There are many factors that influence the selection of a suitable site for an energy from waste plant. During the feasibility stage of this project we assessed several potential project sites using the following key criteria:</p> <ul style="list-style-type: none"> • zoning of the land, • road access, • availability of services, • site readiness • potential social and environmental impacts. <p>The selected project site in Lara scored well on all criteria. The key factors that make the Lara site suitable for this project are:</p> <ul style="list-style-type: none"> • The site is located within the Geelong Ring Road Employment Precinct (GREP). The GREP is Geelong's largest designated industrial development precinct and includes over 500 hectares of land zoned for heavy industrial purposes. • The site is located within an industrial planning zone (Industrial 2 Zone or "IN2Z") which is designated for large industrial purposes like an energy from waste plant. Under the planning scheme, one of the purposes of the IN2Z is "To provide for manufacturing industry, the storage and distribution of goods and associated facilities". • Geelong and the surrounding region have suffered from the closure of large manufacturing plants over recent years. Prospect Hill International sees this project as an opportunity to bring back some of those skilled jobs to the area and hopes to employ people who may have been impacted by skilled job losses in recent years. • The site is located close to potential waste sources, including Geelong, the Surf Coast and Bellarine as well as the growing region of western Melbourne. • The site has good transport links, being close to the Princes Freeway and Geelong Bypass. • Trucks that transport waste to the plant will be able to access the site through roads in the industrial zone and not have to travel on residential streets. <p>Experience with these types of plants around the world shows that they have very low amenity impacts to surrounding communities. There are many examples of EfW plants being located within tens or hundreds of metres of large residential populations (tens of thousands of people), such as London, Paris, Tokyo, Zurich and Vienna. Modern energy from waste plants include sophisticated measures to minimise impacts on surrounding communities, like noise reduction and sound proofing design elements, state-of-the-art air emissions controls and advanced odour controls.</p>	Please refer to the Prospect Hill International website for examples of EfW plants located very close to large residential areas: https://prospecthill.com.au/
Provide evidence the proposed facility will not rely on waste otherwise destined for recycling pathways				<p>The PHI facility plans to divert 400,000 tonnes of residual household and commercial waste from landfills. The waste feedstock would be sourced from a number of Victorian councils, with a preference for waste from local areas such as the Geelong, Surf Coast and Bellarine areas. The waste feedstock would exclude all material used within existing recycling programs (i.e. yellow kerbside bins) – only residual waste (i.e. red top kerbside bins) will be targeted. PHI intends to source approx. 80% of the feedstock from household waste and approx. 20% from commercial waste that is like household waste – i.e. from shopping centres, schools, office blocks, etc. With regard to recycling streams (plastics, paper, etc), we are not targeting recycling streams – we are only targeting residual waste that would otherwise go to landfill.</p> <p>PHI expects that if an approval is granted by EPA, the approval will have conditions about the types of waste that could be accepted by the project – and that only MSW and MSW-like waste will be accepted. Changing the types of waste that can be utilised in the plant will likely require further approval from EPA.</p> <p>It should also be noted that the plant is being designed for MSW waste. Recyclables are not desirable in the waste streams as they have a higher calorific value. Thus only MSW and MSW-like residual waste is being targeted.</p>	See Section 1.6 and 1.7 of the Works Approval Application report
Report projected air emission quality and volume of the facility, including transport emissions				<p>The Air Quality Assessment demonstrates that there is a low risk of air quality impact from the project's emissions. The assessment shows that the emissions of all substances from the EfW Plant will meet all EU IED (European Union - Industrial Emissions Directive) and EPA emission limits. The assessment also shows that the EfW Plant emissions will meet all ground level concentration design criteria for all substances, as specified in EPA requirements.</p> <p>Emissions of air toxics such as IARC Group 1 carcinogens hexavalent chromium (Cr (VI)), cadmium (Cd) and mercury (Hg) were investigated for this assessment. Model results for all of the carcinogens showed that the ground level concentrations due to the EfW Plant are below the relevant EPA criteria, mostly many times below their criterion.</p>	See Appendix D Air Quality Impact Assessment See Appendix C Greenhouse Gas Assessment

			<p>The Air Quality Assessment provides very detailed information on the modelling and results. In section 6 there are modelling plots which show the ground level concentrations of each of the key pollutants modelled. The key pollutants are nitrogen dioxide (NO2) and particulate matter (PM10 and PM2.5). The assessment shows that the levels of NO2, PM10 and PM2.5 at the nearest residence are well below the EPA limits. For example, the PM10 plot below shows that the level of PM10 at ground level at the nearest residence will be below 4 ug/m3, where the EPA limit is 80 ug/m3. For each of the pollutants modelled, the assessment shows the emissions from the project will be meet the EU IED and EPA standards.</p> <p>The Greenhouse Gas Assessment demonstrates that the installation of the EfW Plant will have a net reduction in GHG emissions. Although the project will have direct operational emissions of approximately 194,000 tonnes CO_{2-e} per year, the net benefit (emissions that will be avoided) of the project, is approximately 315,000 tonnes CO_{2-e} per year. In other words, PHI's EfW plant will reduce the state's greenhouse gas emissions by approximately 315,000 tonnes CO_{2-e} per year.</p> <table border="1"> <thead> <tr> <th>Emissions type</th> <th>GHG emissions generated (tonnes CO_{2-e})</th> <th>GHG emissions avoided/saved (tonnes CO_{2-e})</th> </tr> </thead> <tbody> <tr> <td>EfW plant operational emissions</td> <td>192,034</td> <td></td> </tr> <tr> <td>Transport emissions</td> <td>2,500</td> <td></td> </tr> <tr> <td>Emissions offset from displaced electricity</td> <td></td> <td>209,359</td> </tr> <tr> <td>Emissions offset from avoided landfill emissions</td> <td></td> <td>300,051</td> </tr> <tr> <td>Total operational emissions (net benefit)</td> <td></td> <td>314,876 tCO_{2-e} avoided/saved per annum</td> </tr> </tbody> </table> <p>The Greenhouse Gas assessment for this project evaluated emissions associated with both the construction and operational stages of the facility. Logistics were modelled as part of the operational emissions assessment and include:</p> <ul style="list-style-type: none"> • Truck delivery of waste (return trips), modelled both full and empty • Truck removal of: bottom ash (to landfills) and Air Pollution Control residues (to hazardous material landfills) <p>It is estimated that the transport of both of these components will result in a total of 2,500 tonnes CO_{2e}, which is included in the project's direct emissions of approximately 192,000 tonnes CO_{2e} per year.</p>	Emissions type	GHG emissions generated (tonnes CO _{2-e})	GHG emissions avoided/saved (tonnes CO _{2-e})	EfW plant operational emissions	192,034		Transport emissions	2,500		Emissions offset from displaced electricity		209,359	Emissions offset from avoided landfill emissions		300,051	Total operational emissions (net benefit)		314,876 tCO _{2-e} avoided/saved per annum	
Emissions type	GHG emissions generated (tonnes CO _{2-e})	GHG emissions avoided/saved (tonnes CO _{2-e})																				
EfW plant operational emissions	192,034																					
Transport emissions	2,500																					
Emissions offset from displaced electricity		209,359																				
Emissions offset from avoided landfill emissions		300,051																				
Total operational emissions (net benefit)		314,876 tCO _{2-e} avoided/saved per annum																				
Provide a business case summary with the level of waste needed for the plant to be viable and where this waste will come from using more recent data and models.			<p>A business case as per the Department of Treasury and Finance (DTF) guidance is only required for public/government projects funded, delivered or overseen by government departments or agencies. PHI's EfW project is privately funded and for private sector projects using private funding it is extremely rare for a business plan/case to be released publicly. This is because the business plan/case contains commercially sensitive information that can be used by competitors to gain undue advantage. It would be like going to a house auction and telling everyone what your highest bid would be.</p> <p>PHI is aware of the waste stockpile issue at 300-400 Broderick Rd, where the operator of the site abandoned almost 300,000 m³ of waste which has been left to EPA Victoria to manage and clean up. As a result of this concern, PHI is considering whether to release a business plan or business case to the public. PHI will provide further details in the next few weeks.</p>																			
Provide the community of Lara a formal response to all questions raised in this Conference report			<p>This document, Appendix B (Response to Capire's s236 Conference of Interested Persons Report) along with Appendix A (Response to each of the submitters to the EPA Works Approval Application advertising process (21 March to 28 April 2021)) provide comprehensive responses to each and every one of the questions and comments raised during the EPA Works Approval process, including the advertising period and the s20B/s236 Conference of Interested Persons.</p>																			