mosaicLAB

Wollert Waste to Energy Application

S23G Conference of Interested Persons

Report prepared for the Environment Protection Authority Victoria

August 2024

TABLE OF CONTENTS

1. Executive summary

The Environment Protection Authority (EPA) called for a Conference of Interested Persons (the conference) under section 236 of the Environment Protection Act 2017, to better understand community concerns and impacts to an application for a Waste to Energy plant that is proposed for Wollert, a northern suburb in the outer area of Melbourne.

The conference sessions held on 20th and 25th June 2024 aimed to gather comprehensive feedback from residents, businesses, and other stakeholders. MosaicLab, independent facilitators, designed and facilitated the sessions and have prepared this report for the EPA.

1.1 Observations

The Chair of the Conference made the following observations based on the feedback heard at the two sessions:

- The community is distrustful that EPA will listen to the community concerns and will take these concerns into consideration when deciding about the permitting of the proposed waste-to-energy facility.
- With Whittlesea Council and local Members of Parliament (State and Federal) not present, the community feel taken advantage of and feel they have no 'official' advocates speaking on their behalf,
- There is a perception that the local community does not know enough about the waste-to energy proposal or when and how they can participate in the engagement process.
- There is frustration and concern that the communities' questions have gone unanswered from previous engagement held on this proposal, which is leading to further distrust of EPA. (Noting that responses to these earlier questions were uploaded to Engage Victoria on 8 July, after the conference).
- There were local residents and community members participating in the session, as well as people who travelled from further afield and regularly do so for similar conferences on waste-to energy proposals.
- It was clear that there were some participants that were well informed and organised about waste-to-energy facilities and drew on examples of facilities and operations in other locations.
- Participants had perceived knowledge of Cleanaway's financial situation and operations of other waste facilities and deemed them untrustworthy in both fiscal management and compliance to the environmental legislation that oversees a waste management operation.
- Health, air quality and pollution, and environmental impacts were of concern for participants equally and questions over why the facility needs to be in such proximity to residents.
- Issues and concerns about the engagement process in the past and leading up to the Conference of Interested Persons overshadowed any detailed discussions about the

specific impacts related to the proposed facility and any steps that might reduce the impact.

- There is limited understanding or awareness of the different government departments and the role they play in determining the appropriateness of a facility like this. An example of this was the planning process through the Department of Transport and Planning and the opportunity for community to engage at this decision point. Communication and outright oversight of the entire process is lacking from one source, making it confusing and difficult for the community to navigate.
- There is concern that many residents and interested persons were not aware of the conference and that a lack of good, clear communication in different languages and through different, local, and accessible channels to support people getting involved in the engagement process.

1.2 Recommendations

The following recommendations have been made that relate to the EPA, to the proponent 'Cleanaway' and the engagement process.

The Environment protection authority

1. Respond to the questions specifically directed to the EPA and that fall under the Environment Protection Act and make sure they are publicly accessible within 4 weeks of the handing over of this report. This includes making Cleanaway's responses to questions (recommendation 2) public as well.
2. Request Cleanaway to respond to the questions specific to Cleanaway and to send a full response back to EPA within 4 weeks of being notified.
3. Consider the EES 'reasons' (outlined in the Ministerial decision) in the assessment of the application and communicate how these areas have been considered. Reference the environmental conditions in the Act and how they are applied in this assessment.
4. EPA to communicate with the Department of Transport and Planning (DTP) the community concern about the engagement practices across planning permit decision, and the decision not to conduct an EES. EPA to directly share the conference report with DTP and to encourage DTP to engage with referral agencies through EES processes.
5. Engage directly with the Whittlesea Council, explaining the engagement process to date, clear information on the impacts being shared by their local community and consider the council's view on the proposed facility in EPA's assessment.
6. Contact Traditional Owners, Wurrundjeri Woi Wurrung and let them self-determine how they would like to be engaged in the assessment of this application and future engagement with EPA and the Proponent. The outcome of this is to be communicated with the Proponent.
7. Make this Conference of Interested Persons report publicly available on Engage Victoria and send out the Engage Victoria link directly to people who attended the session.
8. Deliver the recommendations included under 'This engagement and future engagement processes' on page 5.
9. Request the Proponent, Cleanaway, to respond to the following recommendations.

The Proponent, Cleanaway

1. Cleanaway to respond to the content/technical questions specific for Cleanaway (see page 36-37) and to send a full response back to EPA within 4 weeks of being notified.
2. Demonstrate how Cleanaway has directly engaged and considered the concerns of the following:
    a. Traditional Owners, Wurrundjeri Woi Wurrung
    b. Whittlesea Council
    c. Emergency services and other land and water managers
    d. Key businesses and community stakeholders in the area such as local schools and early years providers
    e. Residents living in close proximity to the proposed operations and further afield
3. Submit a financial statement that supports Cleanaway's financial standing and ability to manage the proposed waste-to-energy operation. Indicate levels of such a plant being viable in the long term (EPA will determine this timeframe).
4. Provide evidence as to why the Wollert site has been selected for the proposed facility and if any other alternatives were considered, and furthermore, why they were not deemed appropriate.
5. Provide evidence to support how waste will be safely transported to the proposed facility and any mitigation strategies to minimise impacts on the local area.
6. Provide evidence on how emergencies will be managed that may affect the operations and its staff, the local community and the surrounding environment.
7. Provide a statement on how this proposed facility responds to existing state and federal government policy for waste management.

EPA engagement process and future engagements

1. EPA to demonstrate through engagement and communication planning that you are considering how you best reach and engage with the Wollert and surrounding community and stakeholders. This includes thinking about the languages spoken and ways to reach communities that are often not engaging with government.
2. EPA to work with the Department of Transport and Planning to understand how the community can engage in the planning process and communicate this back to the participants. This should be considered in future processes so that there is a consistent approach across government.
3. EPA to produce a clear and simple diagram that outlines EPA's assessment process and what criteria EPA uses to approve or deny a proposal. Explain specific terms with indicators on what EPA looks for when assessing the Proponent and the Application using the current legislative framework. This is to be shared publicly with the participants and on Engage Victoria.
4. EPA to provide the community with a clear list of assessment measures used to monitor and assess any environmental, air and pollution and health impacts in the separate phases (Permissioning, construction and operation) of this proposal. The purpose

of this list of measures is to more clearly describe what EPA is looking for.

5. EPA to consider multiple engagement processes directly with local communities that:
    a. build knowledge of the EPA assessment process and how it works with other government processes (this needs to be delivered early in the process)
    b. allow for the full range of community sentiment; there needs to be consideration that people will be angry about the potential of this happening in their local area and that there may be some people supportive of the process that are not confident to speak up
    shows how this input directly influences decision making or if not, explain why it has not changed the decision

1.3 Summary of concerns

Across the two sessions there were a number of reoccurring themes that identified key concerns around specific impacts of the proposed waste-to-energy facility and concerns on the information available and engagement processes that have been held to date.

The core 15 themes are captured below and have also been analysed and written up into sub themes in the section, Overall Results on page 14.

Communications and engagement

The feedback from the community identified several issues regarding the consultation process. A common theme is the reported lack of information and transparency, with some participants only learning about the project through informal channels, leading to widespread distrust of the process. The engagement and consultation efforts are perceived as inadequate, with short consultation periods and insufficient attempts to involve a broader audience. Accessibility and inclusivity concerns are also noted, particularly for non-English speakers and those with physical or logistical constraints, emphasising the need for information in multiple languages and formats. These issues highlight the need for a more transparent, inclusive, and accountable consultation process to ensure the community's voices are heard and respected.

Environment Protection Authority (EPA)

The feedback from the participants identified several key themes regarding the proposed project and the role of EPA. Concerns about the trust and integrity of EPA were raised, with questions about its ability to assess and monitor the project effectively. Participants cite previous sessions where questions were inadequately addressed, fueling distrust. The community emphasised the need for continuous and transparent monitoring of emissions to protect public health.

The application of the precautionary principle is highlighted, with participants wanting a cautious approach given the uncertainties and potential risks associated with the application and what they see as poor past performance of the proponent.

Policy, regulation, and compliance

Concerns were expressed about the compliance and monitoring standards for the proposed facility, citing past instances where similar facilities failed to meet regulatory standards, resulting in pollution and health risks. Continuous and rigorous monitoring, including real-time emissions reporting, was deemed essential. There were calls for baseline population studies, long-term surveillance, and stringent license conditions to evaluate and mitigate potential risks.

Concerns were also raised about the alignment of the proposed facility with broader policy goals, such as the Victorian Government's commitment to a circular economy and renewable energy targets by 2035. Some noted that similar facilities had been rejected in other states and regions due to risks to human health and the environment, urging a reassessment of the proposal to ensure alignment with state, federal, and international environmental policies and best practices.

The proponent - Cleanaway

The feedback from the sessions revealed concerns regarding Cleanaway's financial viability and credibility, with participants questioning the company's ability to sustain the proposed waste-to-energy facility. There were calls for an independent assessment of Cleanaway's financial capacity and the establishment of a substantial bond to cover potential liabilities. Concerns about transparency and community engagement were also highlighted, with respondents pointing to a lack of clear communication about critical aspects of the project and the need for continuous engagement, including public access to real-time emissions data.

Overseas evidence and technology

Several sub-themes regarding the proposed waste-to-energy facility were captured with examples of other waste-to-energy facilities world-wide. Environmental and health concerns were raised, citing examples from Europe where participants reported that they were shut down due to pollution and health warnings about dioxin contamination. Economic and energy efficiency were also discussed, with participants questioning the cost-effectiveness and long-term viability of waste-to-energy technology. It was suggested by participants that there have been international studies suggesting higher operational costs and inefficiencies compared to other renewable technologies. Regulatory and technological standards were another concern, with doubts about the ability of Australian regulations to ensure safe and compliant operation. Issues such as managing toxic ash, monitoring emissions, and adhering to international agreements were emphasised as requiring strict oversight. The community called for rigorous and transparent regulatory frameworks to ensure that waste-to-energy projects do not compromise environmental and public health standards.

Air quality and pollution

There were concerns about the adequacy of the proposed buffer zone around the waste-to-energy facility, stating that a 1 km buffer zone was insufficient to protect residents from harmful pollutants, and it was suggested that pollution could travel up to 45 km and beyond. There was particular concern about the health risks associated with exposure to toxic chemicals, such as asbestos and PFAS, believed to be released during the waste-to-energy process. Additionally, some people questioned the ability of the facility to comply with air quality standards and regulations, expressing scepticism about Cleanaway's past track record and doubts about the effectiveness of the Alphington monitoring system to support what is needed to monitor the facility. The community advocated for more rigorous and localised, continuous emissions monitoring (CEMS), and stricter enforcement of compliance to ensure that air quality was not compromised and that any violations were addressed.

Health impacts

Participants expressed concerns about the health risks associated with the proposed waste-to-energy facility, particularly for vulnerable populations such as children, the elderly, and those with preexisting health conditions. There were worries about long-term exposure to pollutants like heavy metals, PFAS, and other toxic substances that could lead to serious health issues, including respiratory problems, allergies, and cancer. The facility's proximity to residential areas, schools, and childcare centres was a significant concern due to the perceived health risks. Additionally, there was a lack of trust in regulatory bodies to ensure health and safety, with calls for more robust and transparent health safeguards, regular health checks, exposure monitoring, and adherence to high health standards to prevent negative health outcomes.

Environmental impacts

Participants expressed concerns about the environmental impacts of waste-to-energy facilities, particularly regarding greenhouse gas emissions and climate change. Studies cited indicated that these facilities emitted more greenhouse gases per unit of electricity produced than traditional fossil fuels, potentially exacerbating global warming by releasing substantial amounts of carbon dioxide and methane. Additionally, the potential for soil and water contamination was highlighted, with worries about how these facilities might affect local agriculture and ecosystems through toxic substances in the soil and runoff pollutants affecting nearby waterways like Merri Creek. Concerns were also raised about the health and safety risks to wildlife, with the possibility of toxins being released into the environment, impacting both terrestrial and aquatic species, especially if the facility was close to sensitive ecological zones. Proper management practices and thorough environmental impact assessments were deemed essential to mitigate these risks.

Operations, safety, and emergencies

The participants emphasised the need for stringent occupational health and safety standards. Emergency preparedness and response plans were considered essential for community safety, with residents questioning the adequacy of current procedures and the involvement of local emergency services. Some participants requested clear, well-communicated plans for addressing emergencies, including protocols for immediate action and compensation for affected individuals. Respondents expressed frustration with a lack of information on safety standards, monitoring practices, and contingency plans, calling for detailed, publicly accessible reports and assurances of accountability for any breaches.

Working with traditional owners and key stakeholders

The conference highlighted several key issues regarding the proposed project. The community feels a lack of representation and communication, particularly due to the absence of an active local council, leading to confusion and distrust. Concerns were raised about the engagement with Traditional Owners, questioning the validity of claims made by Cleanaway and emphasising the need for transparent and respectful interactions. The community's vulnerability, especially among non-English speakers and the lack of local representatives, was noted, contributing to feelings of perceived exploitation. These findings underscore the need for improved collaboration and trust between the community, Traditional Owners, and key stakeholders.

The location of the facility

It was highlighted that there are concerns regarding the proximity of the proposed waste-to-energy facility to residential areas and vulnerable communities, including homes, schools, aged care facilities, and hospitals. Residents expressed worries about the potential health risks from pollution, particularly for children and the elderly. Participants suggested that the facility should be located further from communities. Additionally, there were concerns about the impact on property values and community development in the Wollert area. Residents feared that the facility would devalue their properties and hinder the area's growth, making it an undesirable place to live, especially for young families and new housing developments. There was a perception that the area was being unfairly targeted for industrial projects.

Financial concern and impacts

A few participants in the session raised concerns about the financial credibility and accountability of Cleanaway, the proponent of the waste-to-energy facility. Participants requested evidence of Cleanaway's financial stability and an independent analysis of its financial viability, as well as confirmation that the company meets the "Fit and Proper Person" test requirements. Additionally, there were calls for robust risk management and compensation mechanisms to protect the community in case of failures or accidents. Concerns included the adequacy of bonds or financial guarantees to cover potential clean-up

costs and health impacts, with suggestions for substantial bonds like those required for asbestos handling. Participants also sought clarity on accident management and compensation procedures, referencing a fire at Cleanaway's Brooklyn facility, and called for comprehensive plans and financial safeguards to ensure the community and environment are protected.

People centric approach

Concerns were raised about the vulnerability of certain community members and the need for fair treatment. There was a call for more inclusive and equitable processes to consider the specific needs of vulnerable groups, ensuring their voices were heard and respected. This included allowing sufficient time for consultation and providing additional support to those needing it to participate fully in the decision-making process. Transparency and accountability in decision-making were also significant concerns. Participants questioned the weight of their feedback and expressed frustration about the lack of clarity on who made the final decisions regarding the facility. There was a call for clear communication about how decisions were made, what criteria were used, and how community input was integrated into the process.

Waste systems approach

Some participants raised concerns that the waste-to-energy facility undermined the principles of the waste hierarchy and the circular economy, which prioritise waste prevention, reduction, and recycling over disposal. It was felt that the implementation of waste-to-energy technology provided an *'easy way out'* for companies and manufacturers, thereby disincentivising efforts to reduce and recycle waste. Additionally, some participants questioned whether discussions about waste management strategies, including waste-to-energy, should be elevated to a federal level to ensure comprehensive and cohesive policies across all states.

Acceptable level of risk

Some participants questioned the standards used to determine acceptable risk levels and called for greater transparency and accuracy in communication about emission standards and risks. They wanted comprehensive risk assessments and a clear delineation of acceptable and unacceptable risk levels to ensure all potential health and environmental hazards were addressed.

These themes encapsulate the key concerns and priorities of those that attended the Conference of Interested Persons about the proposed waste-to-energy facility, highlighting the need for thorough consideration and action by the EPA.

2. Introduction

2.1 Overview

March 2024, the Environment Protection Authority (EPA) established the need for a Conference of Interested Persons (COIP) to better understand community concerns and impacts to an application for a Waste to Energy plant that is proposed for Wollert, a north suburb in the outer area of Melbourne. MosaicLab was appointed as the 'convenor' of this COIP in May 2024.

The proposed facility, to be developed by Cleanaway Operations Pty Ltd, is designed to process 380,000 tonnes of waste per annum, generating approximately 46.3 MW of electricity. As stated in Engage Victoria 'this initiative aligns with broader efforts to enhance sustainable waste management and energy production in Victoria.'

The conference sessions held on the 20th and 25th June 2024 aimed to gather comprehensive feedback from residents, businesses, and other stakeholders. The feedback gathered us to assist in the 'just resolution of the matter or decision under consideration by the Authority' and to 'Provide an informal means for the Authority to consider the matter and decision' (*Section 236 Environment Protection Act 2017*).

This report summarises the key themes and issues raised during these sessions, providing a detailed examination of the community's sentiment, concerns and the potential environmental, health, and socio-economic impacts of the project.

2.2 Summary of the application

The public consultation period for the Development Licence Application for the Wollert Waste to Energy facility commenced on 24 February 2024 and extended through to 14 April 2024. This application was filed under the *Environment Protection Act 2017*, which sets forth the necessary requirements to safeguard both human health and the environment.

Throughout the consultation period, the EPA received 764 submissions from community members and stakeholders. Of these, 24 people provided detail in their submission.

The facility is designed to thermally treat 380,000 tonnes per annum (tpa) of waste. It will only receive waste that would otherwise be sent to landfill.

The process will generate approximately 46.3MW gross of electricity, 4.7MW of which would be used to power the facility itself. The remainder 41.6MW will be exported to the grid as base load electricity.

Waste bottom ash produced from the process will be treated at the facility to be used as an alternative construction product. Metals will be recovered from waste ash for recycling and sale to market.[1]

---

[1] Source Engage Victoria page - https://engage.vic.gov.au/cleanaway-operations-pty-ltd-app024914

Further details regarding the Development Licence Application is available on the Engage Victoria website (https://engage.vic.gov.au/cleanaway-operations-pty-ltd-app024914.)

2.3 Session purpose

An in-person event was held on Thursday 20th June 2024 and an online session was held on Tuesday 25th June 2024.

The purpose of the two sessions were to:

- hear more from participants about their areas of interest and concern
- develop a deeper understanding about community sentiment
- capture clear data and information to inform EPA's decision making.

Past submissions from the community were considered and five key themes were identified to explore further. These themes were:

1. Health impacts from air / odour
2. Environmental impacts – land / water
3. Noise impacts - operations
4. Green House Gases & Climate change
5. Waste Management – inputs (feedstock)
6. Other impacts – such as impact on people's homes, property values, traffic/access, fire risk, circular economy, the engagement process, and impact on vulnerable people in the community

Concerns and feedback across these six areas was collected during the conference sessions and have been analysed and included in this report.

2.4 Conference Agenda

In-person agenda

Time	AGENDA
5:00PM	Pre-Conference Drop in Opportunity for early arrivals to find out more about the project and chat to EPA staff on particular concerns. 1. *Health impacts from air / odour* 2. *Environmental impacts – land / water* 3. *Noise impacts - operations* 4. *Green House Gases & Climate change* 5. *Waste Management – inputs (feedstock) & outputs*
5:30PM	Arrivals & Conference Registrations
6:00PM	Conference formally starts – setting the scene • Welcome & Introductions • Purpose & Objectives • Roles & Responsibilities • Overview of Agenda - Participation Guidelines
6:15PM	Overview of the Application Waste to Energy - Cleanaway
6:20PM	EPA decision making and past engagement Overview of EPA decision making process and the summary of interests and concerns arising from the submissions - EPA
6:30PM	Understanding the key community impacts and concerns A chance to check the key impacts and concerns and to understand other experiences This agenda item remained the core approach and the participants voiced a preference to remain together as a group.
8:00M	Refreshment break – Opportunity to speak with EPA specialists in the topic areas

Time	AGENDA
8:30PM	EPA reflections and responses EPA provided a reflection on some of the core concerns they were hearing and were able to talk to the following points: • Feedback on the engagement process to date and how it works with the EPA legislation • The inclusion of science and how this information is used in EPAs decision making.
8:45PM	Final reflections There was an opportunity to hear final reflections from the attendees to complete an individual comment form.
8:55PM	Next Steps
9:00PM	Close Conference

online agenda

Time	AGENDA
5:45PM	Arrivals & Conference Registrations
6:00PM	Conference formally starts – setting the scene • Welcome & Introductions • Purpose & Objectives • Roles & Responsibilities • Overview of Agenda - Participation Guidelines
6:10PM	Overview of the Application Waste to Energy - Cleanaway
6:20PM	EPA decision making and past engagement Overview of EPA decision making process and the summary of interests and concerns arising from the submissions - EPA
6:30PM	Work with key science EPA staff Three breakout rooms were opened and participants moved freely to the topic that interests them the most. Topics included: • Air pollution and public health • Noise, land, and water & waste impacts • Green House Gas impacts

Time	AGENDA
7:10M	Refreshment break
7.20PM	Understanding the key community impacts and concerns A chance to check the key impacts and concerns and to understand other experiences This agenda item remained the core approach and the participants voiced a preference to remain together as a group.
8:35PM	EPA reflections and responses EPA provided a reflection on some of the core concerns they were hearing and were able to talk to the following points: • Feedback on the engagement process to date and how it works with the EPA legislation • The inclusion of science and how this information is used in EPAs decision making.
8:45PM	Final reflections There was an opportunity to hear final reflections from the attendees to complete an individual comment form.
8:55PM	Next Steps
9:00PM	Close Conference

2.5 Participants

EPA and the Proponent, Cleanaway, were in attendance.

In total, 46 community participants attended the in-person session and 18 attended the online session. Participants included local residents, representatives of local business groups, community groups, special interest groups and community members that travelled from outside the local area to provide their feedback.

The topics and subject matter experts that participated across the two nights from EPA covered a range of topics and included up to 20 people for the in-person session and 13 people for the online session.

2.6 Information provided

EPA prepared a series of fact sheets and posters that were on display at the commencement of the in-person event on the 20th June 2024 and were used to support the drop-in activity.

The topics of the factsheets and a brief overview are listed below.

Overview: Wollert waste-to-energy

A summary of the application submitted by Cleanaway with a clear statement included on the purpose of the facility. EPA captured further details on the process that they had delivered to date, including the initial consultation phase from 24 February to 14 February. The fact sheet provided a brief overview of the Cleanaway proposal including information about the incoming material, how waste will be received, stored, and managed as it is processed. Further points captured information that talked to noise, air, traffic, and geographic location concerns.

Health impacts from air emissions and odour: Wollert waste-to-energy

This fact sheet included a definition on air emissions and odour and EPA's role through the relevant legislative requirements. Further detail was provided on the key points that EPA considers in its assessment process.

Environmental impacts to land and water: Wollert waste-to-energy

This fact sheet included a definition of the type of impacts that relate to land and water management. It also included information about EPA's role through the relevant legislation and key assessment considerations when looking at land and water. There are other agencies noted on this fact sheet that will have some responsibility for land and water management.

Noise due to operations: Wollert waste-to-energy

This fact sheet included a definition on the relevant noise emissions related to the operations of such a facility and the possible impacts on the everyday lives of residents and the natural environment. It also included information about EPA's role through the relevant legislation and guidelines, and protocols to support an assessment on noise related issues.

Greenhouse gas and climate change: Wollert waste-to- energy

This fact sheet included a definition of greenhouse gas emissions that relate to the construction and operations of the facility. It also outlined climate change impacts to be assessed. It included information about EPA's role through the relevant legislation and key assessment considerations when looking at greenhouse gas emissions. Other State Government departments with responsibilities in this area were mentioned.

The final fact sheets are in Appendix 3.

3. Overall Results

3.1 Working with and analysing the data

The data for the key findings in this report was gathered from a variety of sources during both in-person and online sessions conducted by MosaicLab. The in-person session included comments made by attendees during plenary discussions, which were visibly scribed and placed on the wall by MosaicLab facilitators. Additionally, written feedback was collected from some attendees who provided their thoughts on feedback cards handed out and gathered at the end of the session. A few participants also provided previously prepared comments and questions which were handed to the facilitators at the end of the conference or soon after.

For the online session, data was collected from comments made by participants in plenary discussions, which were recorded by MosaicLab scribes. Further insights were gathered from breakout room discussions, documented by both MosaicLab and EPA representatives. Additionally, participants contributed their reflections through GroupMap during the online session, providing another piece of qualitative data.

To analyse the data, it was firstly manually reviewed and coded into similar areas/themes. The data was also themed using AI technology to confirm the accuracy of the themes and pull out the key words consistently used in each of the themes. These themes have been used as a basis of this report and the recommendations.

Across the two sessions, there were 134 questions provided as part of the feedback, many questions incorporated a concern from the person asking them. The remaining data constituted community concerns (123 responses) or a comment around evidence or facts (168 responses)[2].

Whilst the processes across the sessions varied slightly, the questions remained the same and the feedback was consistent across the two sessions. Therefore, the data has been merged across the two conferences and together form the key findings.

3.2 Key findings from the themes

Below are a series of 15 key themes that emerged from the feedback There are overlaps between some themes. These overlaps have been included and not removed to ensure a comprehensive capture of the issues and concerns raised.

[2] Please note the numbers quoted are individual comments, they do not represent individual people. The same comment may have been made by the same people several times, or many people will have made similar comments.

Communications and engagement

Across the two sessions there were 56 comments or questions that were relevant to communications and engagement. It was a particularly strong theme coming through the in-person conference. Based on the comments captured, there were five sub-themes that were identified.

1. Lack of Information and Transparency

A recurring issue in the feedback is the community's frustration with the lack of information and transparency throughout the consultation process. Many respondents mentioned that they only found out about the project through social media or informal channels rather than through official communication. There is a pervasive sentiment that the process is being conducted in "stealth mode," with insufficient effort to ensure that all community members, especially those with language barriers, are adequately informed. This lack of transparency has bred distrust and scepticism towards the authorities and the Proponent.

2. Inadequate Engagement and Consultation

The feedback highlights significant dissatisfaction with the engagement and consultation processes. Respondents feel that the consultation periods are too short and that there is a lack of genuine effort to engage a broader community. Concerns were raised about the inadequacy of venues and the lack of proper dissemination of information.

3. Accessibility and Inclusivity Issues

Accessibility is a major concern for the community, with numerous respondents pointing out the barriers faced by those who are not proficient in English or who have limited technical skills. There is a call for information to be made available in multiple languages and formats that are easy to understand. Additionally, the community feels that there is not enough effort to accommodate those with physical or logistical constraints, such as inadequate parking at venues and the absence of mail notifications. Ensuring inclusivity in communication is crucial to making the process fair and representative of the entire community.

4. Mistrust and the Need for Accountability

The community's distrust towards the process and the authorities is palpable in the feedback received at the two sessions. Many feel that their questions and concerns are not being adequately addressed or responded to and that there is a lack of accountability from the proponent and regulatory bodies. The mention of misinformation regarding compliance with international emission standards has further exacerbated these feelings. There is a strong demand for a comprehensive roadmap, clear answers, and ongoing communication to rebuild trust and ensure that the community's voices are heard and respected.

5. Impact on Vulnerable Populations

The conference session feedback revealed a deep concern for how the project and its processes are affecting vulnerable populations. There is a perception that the community's vulnerability is being exploited, especially as many feel they have not been given enough time or resources to properly organise and respond. Indigenous people have highlighted that they were not adequately informed or engaged in the process and what it means for managing Country. The emotional and psychological impact of the proposed

facility on the community, particularly regarding children's health and the proximity to residential areas, has raised significant concern and opposition.

These sub-themes underscore the need for a more inclusive, transparent, and accountable approach to community engagement and communication.

Environment Protection Authority (EPA)

Across the two sessions there were 41 comments or questions that were relevant to the Environment Protection Authority. Based on the comments captured, there were five sub-themes that were identified.

1. Trust and Integrity of EPA

A theme emerging from some of the participants is the community's trust in EPA and its integrity. Some participants question whether the EPA can assess and regulate the proposed project, expressing perceived concerns about potential cover-ups and lack of transparency. In addition, EPA did not share responses to questions from the March/April community session through Engage Victoria in a timely manner, this has only fueled distrust amongst attendees further. There is a sense that the EPA is not living up to its responsibility to protect public health and the environment, leading to scepticism about its effectiveness and intentions.

2. Climate Change and Environmental Impact

Another major concern is the impact of waste incineration on climate change and the environment. Some respondents highlighted that waste-to-energy facilities contribute significantly to greenhouse gas emissions, which exacerbate global warming. There are calls for EPA to undertake comprehensive climate assessments and consider the cumulative environmental impacts of multiple facilities. The community also questions why EPA has not adopted stricter measures like those in the European Union (EU), such as including waste incineration in emissions trading schemes and enforcing more rigorous environmental impact assessments.

3. Health and Safety Risks

The potential health and safety risks associated with the proposed incinerator are a critical issue for the community. There is concern that the standards set by the EPA may not be sufficient to protect the community, especially given past instances of non-compliance by Cleanaway. The need for continuous and real-time monitoring of emissions is emphasised, with calls for greater transparency and public availability of monitoring data to ensure accountability and to safeguard public health.

4. Application of the Precautionary Principle

The application of the precautionary principle is a recurring theme in responses captured at the conferences. Some respondents argue that if this principle were properly applied, it would prevent the approval of the proposed facility. It was also stressed that the importance of a cautious approach was needed, especially given the uncertainties and potential risks associated with newer technologies. The community expects the EPA to prioritise precautionary measures and not permit projects that could pose significant risks to

health and the environment. There is also a call for EPA to learn from other jurisdictions that have rejected similar proposals based on comprehensive risk assessments.

5. Social Licence and Community Engagement

The concept of social licence and the need for genuine community engagement are crucial themes. Respondents feel that EPA and Cleanaway have not done enough to engage with the community, including Traditional Owners. There are doubts about the authenticity of claimed agreements and collaborations with noted organisations and the community calls for more robust mechanisms ensuring that community concerns are addressed and that there is ongoing dialogue and transparency. Effective community engagement is seen as essential to building trust and ensuring that projects have the necessary social support to proceed.

These sub-themes highlight the community's key concerns regarding the EPA's role, the environmental and health impacts of proposed projects, and the importance of transparency and genuine engagement.

Policy, regulation, and compliance

Across the two sessions there were 39 comments or questions that were relevant to policies, legislation and compliance required. Based on the comments captured, there were three sub-themes that were identified.

1. Compliance and Monitoring Standards

Concerns were captured about the compliance and monitoring standards for the proposed facility. Some participants highlighted past examples where similar facilities have failed to meet regulatory standards, leading to pollution and health risks. There is scepticism about whether Cleanaway can comply with the latest EU emissions standards, given the lack or perceived lack of independently verified evidence of compliance from their reference plants. Furtherm ore, the community is worried about the adequacy of monitoring practices, especially the perceived tendency for companies to turn off monitoring systems to avoid detection of non-compliance. Continuous and rigorous monitoring, including real-time reporting of emissions, is deemed crucial to ensure adherence to environmental and safety standards.

2. Application of the Precautionary Principle

The precautionary principle is a prominent theme in the participants' concerns, with some people arguing that it should be applied more rigorously to prevent potential harm from the proposed facility. They point out that if this principle were properly implemented, it would likely preclude the facility's approval due to the inherent risks associated with operations of a waste incineration facility. Some community members emphasise the need for baseline population studies and long-term surveillance to measure the environmental and health impacts of the incinerator. There is also a call for stringent conditions on licenses, ensuring that any potential risks are thoroughly evaluated and mitigated before proceeding with the project.

3. Alignment with Government Policy and Standards

There is concern among some people about the alignment of the proposed facility with broader policy goals and standards. The Victorian Government's commitment to a circular economy and ambitious renewable energy targets by 2035 raises questions about how a waste-to-energy facility fits within these frameworks. It was shared by people that European reports have indicated that such facilities are counterproductive to achieving a circular economy. Additionally, it was shared by some participants that similar facilities have been rejected in other states, like NSW, or even the Melbourne metropolitan area, due to unacceptable risks to human health and the environment. Some people urged for a reassessment of the proposal to ensure it aligns with both State, Federal and international environmental policies, and best practices.

These sub-themes highlight the community's demand for stringent compliance measures, rigorous application of the precautionary principle, and alignment of the proposed facility with overarching policy goals to ensure environmental and public health protection.

The proponent - Cleanaway

Across the two sessions there were 37 comments or questions that were relevant to the Proponent, Cleanaway. Based on the comments captured, there were four sub-themes that were identified.

1. Financial Viability and Credibility

The financial stability and credibility of Cleanaway was a key concern among some of the participants in the sessions. Many question the company's ability to sustain the proposed waste-to-energy facility, citing Cleanaway's significant short-term debt and it's listing as one of the most vulnerable companies on the ASX (please note: no evidence has been provided to confirm or deny this comment). There were some concerns about whether Cleanaway has adequately demonstrated its financial capacity to comply with regulatory obligations and fund the necessary clean-up costs in case of environmental spills. Some community members wanted to better understand Cleanaway's financial viability and wanted an independent assessment. It was also suggested that the establishment of a substantial bond from Cleanaway should be required, to cover potential liabilities, ensuring that the project is financially sound before proceeding.

2. Compliance with Environmental Standards

Some participants expressed serious concerns about Cleanaway's ability to comply with environmental standards, particularly those set by the EU. Participants mentioned that reference facilities cited by Cleanaway have (reportedly) failed to meet these stringent standards, raising concerns about the potential for non-compliance in the proposed facility (note: this has not been confirmed by the author). The community attending the sessions seemed knowledgeable about the company's past track record, and was wary, noting multiple instances of non-compliance documented by interstate Environment Protection Authorities in Australia. This shared history of regulatory breaches in the sessions, seems to undermine trust in Cleanaway's commitment to environmental protection and adherence to best practices, leading to calls for rigorous monitoring and enforcement mechanisms.

3. Transparency and Community Engagement

It was shared by some that there is a sense of mistrust regarding Cleanaway's transparency and engagement with the community. Respondents highlight a lack of clear communication about critical aspects of the project, such as the results of the "proper person" test and the specific measures in place to prevent illegal waste burning. The community is particularly concerned about misinformation and inadequate consultation, feeling that Cleanaway has not been forthcoming about the potential impacts and management strategies for the waste-to-energy facility. Effective and continuous engagement, including public access to real-time emissions data and detailed answers to community questions, is deemed essential to rebuild trust and ensure informed community involvement.

4. Health and Safety Concerns

The health and safety of the community was raised, with many respondents sceptical about Cleanaway's commitment to these issues. It was shared that the company's apparent poor track record in occupational health and safety (OH&S), being voted the worst OH&S employer in NSW, raised alarm for some participants about the potential risks associated with the proposed facility. There are fears about the long-term health impacts of emissions, particularly on vulnerable populations such as children and the elderly. The community would like to see stringent health and safety standards, regular health checks for workers, and comprehensive emergency response plans to mitigate any potential risks posed by the facility.

These sub-themes highlight the participants concerns about Cleanaway's ability to manage the proposed waste-to-energy facility responsibly, emphasising the need for financial scrutiny, stringent regulatory compliance, transparent communication, and robust health and safety measures.

Overseas evidence and technology

Across the two sessions there were 36 comments or questions that were relevant to overseas evidence and technology considered to identify the right type of facility. Based on the comments captured, there were three sub-themes that were identified.

1. Environmental and Health Concerns

There were a number of concerns highlighted that significant environmental and health impacts associated with waste-to-energy facilities were recognised in Europe and examples were cited that these types of facilities were either shut down or not considered in future planning. Despite claims of using the best European technology, participants were wary of the potential for contamination and pollution. Examples from Europe, such as the closure of facilities due to pollution and warnings from health departments about dioxin contamination, raised doubts about the safety and efficacy of such facilities. It was shared that studies indicate that waste-to-energy facilities emit more greenhouse gases and other pollutants compared to cleaner energy sources, challenging the inclusion in "clean" or "renewable" energy alternatives. Some people fear that adopting these technologies could lead to increased health risks and environmental degradation.

2. Economic and Energy Efficiency

Economic considerations and energy efficiency are critical sub-themes in the responses. Some participants questioned the cost-effectiveness of waste-to-energy facilities, pointing out that combustion-based power is more expensive than renewable energy sources. There are concerns about the long-term viability and hidden costs associated with managing residual waste and emissions. References to international studies and reports, such as those from the International Energy Agency (IEA) and the United States Environmental Protection Agency (EPA), suggest that waste-to-energy technology may not be the best economic choice for managing waste, given the higher operational costs and the inefficiencies in converting waste to energy compared to other renewable technologies.

3. Regulatory and Technological Standards

Some feedback captured revealed doubts about the regulatory and technological standards of waste-to-energy facilities. Some participants cite examples from Europe and the United States where even the best available technologies have failed to meet stringent environmental standards. There is scepticism about whether Australian regulations and enforcement will be adequate to ensure safe and compliant operation. Issues such as the management of toxic ash, continuous monitoring of emissions, and adherence to international agreements like the Stockholm Convention are highlighted as areas needing strict oversight. The community calls for more rigorous and transparent regulatory frameworks to avoid the pitfalls experienced overseas and ensure that waste-to-energy projects do not compromise environmental and public health standards.

These sub-themes underscore the community's apprehensions regarding the adoption of waste-to-energy technologies based on international examples and highlight the need for careful consideration of environmental, economic, and regulatory factors.

Air quality and pollution

Across the two sessions there were 26 comments or questions that were relevant to air quality and pollution. Based on the comments captured, there were three sub-themes that were identified.

1. Health Risks and Buffer Zones

Some community members expressed concern about the adequacy of the proposed buffer zone around the waste-to-energy facility. Some people argued that a 1 km buffer zone is insufficient to protect residents from harmful pollutants, as studies suggest that pollution can travel up to 45 km and beyond. There is a particular worry about the health risks associated with exposure to toxic chemicals, such as those found in asbestos and PFAS, which are believed to be released into the air and water during the process. The participants cited past experiences with other waste-to-energy facilities, which failed to comply with regulations. This exacerbates fears about potential health impacts. Ensuring larger buffer zones and stricter monitoring is seen as essential to safeguard public health.

2. Regulatory Compliance and Monitoring

Some people questioned the ability of the proposed waste-to-energy facility to comply with air quality standards and regulations. There is scepticism about Cleanaway's track record and doubts about the effectiveness of the Alphington monitoring system, which is considered too far away to provide accurate air quality data for the area. Concerns are raised about the emission of greenhouse gases and other pollutants, particularly during startup and shutdown phases, when emissions are highest. The community would like to see more rigorous and localised monitoring systems, continuous emissions monitoring (CEMS), and stricter enforcement of compliance to ensure that air quality is not compromised and that any violations are addressed.

These sub-themes underscore the community's deep concerns about the potential health and environmental impacts of the proposed waste-to-energy facility, highlighting the need for stringent regulatory measures and robust monitoring systems to mitigate the impact of air quality and pollution.

Health impacts

Across the two sessions there were 26 comments or questions that were relevant to impacts based on human health. Based on the comments captured, there were three sub-themes that were identified.

1. Chronic Health Risks and Vulnerable Populations

Some participants revealed deep concerns about the chronic health risks associated with the proposed waste-to-energy facility, particularly for vulnerable populations such as children, the elderly, and those with preexisting health conditions. Respondents are worried about the long-term exposure to pollutants like heavy metals, PFAS, and other toxic substances that may be emitted during the incineration process. There is a fear that these emissions could lead to serious health issues, including respiratory problems, allergies, and even cancer. The community stresses the need for stringent monitoring and preventative measures to protect the health of all residents, especially those who are most vulnerable.

2. Impact on Community Well-being and Lifestyle

The potential impact of the waste-to-energy facility on community well-being and lifestyle is another significant concern. Residents expressed concern about the possibility of air, water, and soil contamination, which could affect local agriculture and gardens, undermining efforts towards sustainability and self-sufficiency. There are also worries about the health implications of contaminated soil and produce. Some participants were particularly concerned about the facility's proximity to residential areas, schools, and childcare centres, fearing that it could pose significant and unnecessary health risks. Ensuring a safe distance from these sensitive areas is a priority for the residents.

3. Trust in Regulatory Bodies and Health Safeguards

Some participants expressed a lack of trust in the regulatory bodies responsible for ensuring the health and safety of the community. The community calls for more robust and transparent health safeguards, including regular health checks and exposure monitoring for

workers and residents. They also emphasise the importance of learning from past mistakes and ensuring that the proposed facility adheres to the highest health standards to prevent any negative health outcomes. The need for emergency response plans and clear procedures for dealing with potential contamination events is also highlighted.

These sub-themes highlight the community's concerns about the health impacts of the proposed waste-to-energy facility, emphasising the need for rigorous health safeguards, transparent regulatory processes, and the protection of vulnerable populations.

Environmental impacts

Across the two sessions there were 24 comments or questions that were relevant to environmental impacts. Based on the comments captured, there were three sub-themes that were identified.

1. Greenhouse Gas Emissions and Climate Change

A significant concern among some participants is the contribution of waste-to-energy facilities to greenhouse gas emissions and climate change. Studies cited by some participants indicated that these facilities emit more greenhouse gases per unit of electricity produced than traditional fossil fuels like coal, oil, and gas. This was then reflected that it exacerbates global warming by releasing substantial amounts of carbon dioxide and methane, contradicting claims that waste-to-energy is a cleaner alternative. Participants stated that the life cycle assessments show that the overall greenhouse gas emissions from these facilities can be comparable to or even exceed those of conventional fossil fuel-based electricity, questioning the environmental benefits of such projects.

2. Soil and Water Contamination

The potential for soil and water contamination is another major environmental impact highlighted by some people. Respondent's expressed concerns about how waste-to-energy facilities might affect local agriculture and ecosystems right through to the impact of the quality of water caught in rain tanks. There were also concerns that the runoff from this facility could introduce pollutants into nearby waterways like Merri Creek, affecting aquatic life and potentially leading to broader environmental impacts. Proper management of ash disposal and effective water management practices are essential to mitigate these risks.

3. Health and Safety Risks to Wildlife

The health and safety risks to wildlife were also a recurring theme in the responses. There was concern that the burning of waste materials could release toxins into the environment, impacting both terrestrial and aquatic species. It was thought that if the waste-to-energy facility is close to sensitive ecological zones then there are greater impacts, making it important to conduct thorough environmental impact assessments and implement safeguards to protect wildlife.

These sub-themes highlight the community's concerns about the environmental impacts of waste-to-energy facilities, emphasising the need for comprehensive assessments and robust mitigation measures to protect the climate, soil and water quality, and wildlife health.

Facility operations, safety, and emergency responses

Across the two sessions there were 22 comments or questions that were relevant to impacts based on human health. Based on the comments captured, there were three sub-themes that were identified.

1. Health and Safety Standards

The health and safety of the community and workers was raised with emphasis on the need for stringent health and safety standards, including regular health checks and exposure monitoring for workers at the facility. The community's worries are amplified by the potential risks associated with the burning of materials like lithium-ion batteries, which can cause fires and explosions. There are also concerns about the long-term health impacts of pollutants such as heavy metals and plastics. To prioritise people's health, some participants called for robust and continuous monitoring of emissions and the implementation of best practices to mitigate these risks.

2. Emergency Preparedness and Response

Emergency preparedness and response plans were deemed as critical to ensuring community safety. Some residents are anxious about the facility's ability to handle potential accidents and contamination events. They question the adequacy of current emergency procedures and the involvement of local emergency services. The community wants to see clear, well-communicated plans for addressing emergencies, including protocols for immediate action and compensation for affected individuals. Ensuring that local services are equipped and trained to deal with potential hazards is seen as essential for the safety of the local community.

3. Transparency and Accountability

Transparency and accountability from Cleanaway and regulatory bodies are crucial to building trust within the community. Respondents expressed frustration with a gap in information about safety standards, monitoring practices, and contingency plans. There are calls for detailed, publicly accessible reports, and for some, assurances that Cleanaway will be held accountable for any breaches of safety and environmental standards. This includes transparent communication about financial arrangements, decommissioning plans, and the handling of hazardous materials. By prioritising transparency and accountability, Cleanaway can better address community concerns and demonstrate a commitment to putting people first.

These sub-themes highlight the community's focus on health, safety, emergency preparedness, and the need for transparent and accountable practices to ensure that the proposed waste-to-energy facility prioritises the well-being of the people it affects.

Working with Traditional owners and key stakeholders

Across the two sessions there were 20 comments or questions that were relevant to communications and engagement with Traditional Owners and key stakeholders. This was a particularly strong theme at the in-person conference. Based on the comments captured, there were four sub-themes that were identified.

1. Lack of Representation and Communication

One of the most prominent issues highlighted in the conference is the lack of representation and advocacy for the community. With the local council in administration (Whittlesea City Council), residents feel they have no official body to direct their questions to, or a body that they feel will listen to and advocate for their concerns. This gap in representation has led to confusion and a sense of being bypassed in the planning process/ Some participants believe that this is evidenced by Whittlesea Council not being present at the conference and that they are not aware of council's view on the proposal. This lack of communication has resulted in a pervasive distrust towards the process and those managing it.

2. Engagement with Traditional Owners

There are concerns about the engagement with Traditional Owners and First Nations people. Respondents question Cleanaway's claims of working with Indigenous groups, specifically pointing out that Traditional Owners have no knowledge of the project and have not given their approval. This situation underscores the need for genuine and transparent engagement with Traditional Owners, respecting their cultural heritage and protocols. There is scepticism about corporate virtue signaling (when an organisation talks about their high valued and responsible approach) and whether the Aboriginal Cultural Heritage Land Management Agreement with the Wurundjeri people has been adequately honoured.

3. Vulnerability of the Local Community

Some participants reflected that the community is vulnerable especially given the high proportion of residents who speak English as a second language and the absence of an elected council. There is a strong sentiment from the community that this vulnerability is not being considered in the process. This is compounded by the fact that it was reflected that State and Federal representatives do not live locally, further exacerbating the feeling of unrepresented interests and neglected voices within the community.

4. Engaging key stakeholders on emergency management and response

Safety and environmental concerns associated with the project were raised and whether appropriate emergency procedures are in place to handle potential contamination events. The community is particularly worried about the lack of consultation with local emergency services, such as the Wollert Fire Brigade, to ensure they are equipped to deal with hazards. These concerns reflect the broader anxiety about the project's impact on both the environment and public health.

These sub-themes illustrate the critical areas that need to be addressed to improve collaboration and trust between the community, Traditional Owners, and key stakeholders such as the Whittlesea City Council.

The geographic location of the facility

Across the two sessions there were 15 comments or questions that were relevant to the location of the facility put forward by the proponent or other suggestions to consider. Based on the comments captured, there were two sub-themes that were identified.

1. Proximity to Residential and Vulnerable Areas

A concern highlighted in the responses captured is the proximity of the proposed waste-to-energy facility to residential areas and vulnerable communities. Residents are particularly worried about the facility being situated close to homes, schools, aged care facilities, and hospitals. The potential pollution from the facility is seen as a direct threat to the health and well-being of these populations, especially children and the elderly, who are more susceptible to the harmful effects of air pollution. Participants argued that given the vastness of Australia, there is no justification for placing such a facility so close to residential areas, and they advocate for it to be located much further away from communities.

2. Impact on Property and Community Development

The potential impact of the waste-to-energy facility on property values and community development in the Wollert area is another significant concern. Residents fear devaluation of their properties and the subsequent financial burden that might force them to sell their homes and not be financially equipped to purchase elsewhere. This is particularly troubling for a developing area like Wollert, which is home to many young families and new housing developments. There is a strong sentiment that the introduction of such a facility would undermine the growth and development of the community, making it an undesirable place to live. The community's frustration is compounded by the perception that this area is being unfairly targeted for industrial projects.

These sub-themes underscore the community's deep concerns about the proposed facility's location and its potential impacts on their health, property values, and overall quality of life.

Financial concern and impacts

Across the two sessions there were 15 comments or questions that were relevant to financial management and viability of the proposed Wollert facility. Based on the comments captured, there were two sub-themes that were identified.

1. Financial Credibility and Accountability

One concern expressed by some participants in the session is the financial credibility and accountability of Cleanaway, the proponent of the waste-to-energy facility. There were concerns about Cleanaway's ability to secure the necessary financial resources to build and operate the facility compliantly. This scepticism was fueled by some participants understanding of Cleanaway's apparent poor financial record, including substantial short-term debt and being identified as one of the most vulnerable companies on the ASX. The participants would like to see evidence of Cleanaway's financial stability and an independent analysis of its financial viability. Additionally, respondents are questioning whether Cleanaway can meet the "Fit and Proper Person" test requirements, ensuring that the company has the financial capacity to comply with any obligations imposed by regulatory authorities. Without such assurances, there is a significant concern about the potential financial risks and liabilities that may fall on the community and the environment.

2. Risk Management and Compensation

Another sub-theme captured is the need for robust risk management and compensation mechanisms to protect the community in case of any failures or accidents associated with the facility. Some people are particularly concerned about the adequacy of bonds or financial

guarantees that Cleanaway must provide to cover potential clean-up costs and health impacts. It was suggested that substantial bonds are imposed upfront, like those required for asbestos handling, to ensure that funds are available for any necessary remediation. There is also a call for clarity on how accidents, such as the fire at Cleanaway's Brooklyn facility, are managed and how affected individuals are compensated. The community seeks assurance that there are comprehensive plans and financial safeguards in place to handle any adverse events, ensuring that the burden does not fall on the public or lead to long-term environmental damage.

These sub-themes highlight the community's concerns about ensuring financial stability, accountability, and robust risk management for the proposed waste-to-energy facility.

People centric approach

Across the two sessions there were eight (8) comments or questions that were relevant to a people centric approach to assessing the future of the waste-to-energy facility. Based on the comments captured, there were two sub-themes that were identified.

1. Vulnerability and Fair Treatment

A recurring theme in the concerns raised is the vulnerability of certain community members and the need for fair treatment. Respondents feel that they have not been given adequate time to gather themselves and respond to the proposed waste-to-energy facility, leading to a sense of being taken advantage of. Even though EPA has provided two information sessions (2 and 6 March 2024 – one in-person and one online), the Conferences of Interested Persons (20 & 25 June 2024 – one in-person and one online), provided an open public submission period from 20 Feb-14 April 2024 and shown respect during these engagements, there is still a strong call for more inclusive and equitable processes that consider the specific needs of vulnerable groups, ensuring that their voices are heard and respected. This includes allowing sufficient time for consultation and providing additional support to those who may need it to participate fully in the decision-making process.

2. Transparency and Accountability in Decision-Making

Transparency and accountability in the decision-making process are critical concerns for the community. Some participants question the weight of their feedback and express frustration about the lack of clarity on who makes the final decisions regarding the waste-to-energy facility. There is a call for clear communication about how decisions are made, what criteria are used, and how community input is integrated into the process. Additionally, there is a demand for the application of the precautionary principle to avoid imposing undue risks on the most vulnerable populations.

These subthemes highlight the need for decision making to be made transparently and with accountability to the community is seen as essential for building trust and ensuring that the interests of all community members are safeguarded.

Waste systems approach

Across the two sessions there were six (6) comments or questions that were relevant to thinking about alternatives that consider the whole waste system, not just waste management. Based on the comments captured, there were two sub-themes that were identified.

1. Impact on Waste Hierarchy and Circular Economy

A few concerns were raised by respondents that the waste-to-energy facility undermines the principles of the waste hierarchy and the circular economy. It was felt that waste hierarchy prioritises waste prevention, reduction, and recycling over disposal. However, it was felt that the implementation of waste-to-energy technology is viewed as providing an '*easy way out*' for companies and manufacturers, thereby disincentivising efforts to reduce and recycle waste.

2. Influence on Recycling Programs and Policy

A few participants questioned whether discussions about waste management strategies, including waste-to-energy, should be elevated to a federal level to ensure comprehensive and cohesive policies across all states. It was mentioned that clear strategies from regulatory bodies like the EPA and Recycling Victoria to prevent big waste-to-energy facilities from disrupting recycling initiatives and to ensure that waste management practices align with long-term environmental sustainability goals are necessary.

These sub-themes highlight the community's concerns about how the waste-to-energy facility may be counter intuitive to other waste management policies and the work undertaken to promote a circular economy.

Acceptable level of risk

Across the two sessions there were six (6) comments or questions that were relevant to the consideration of risk and questions over what level of risk, if any, is acceptable. Based on the comments captured, there were three sub-themes that were identified.

1. Health and Environmental Risks

Some respondents emphasised that there is no acceptable level of risk when it comes to children's health, noting that some children are already experiencing skin rashes, which they fear could be linked to pollution. The community points to a similar facility proposed in 2018, which was shared in the session to be rejected by the NSW EPA due to its unacceptable risks to human health and the environment. The participants raised that the cumulative impact of emissions from such facilities is greater than what is often acknowledged, and thus, the precautionary principle should be applied to protect both human health and the ecosystem.

2. Technological and Regulatory Concerns

Another sub theme is the uncertainty around the effectiveness and safety of emissions technology used in waste-to-energy facilities. Some participants argued that certain emissions control technologies can inadvertently worsen emissions, posing a significant health risk. Additionally, there is frustration over the lack of clear information from regulatory

bodies like EPA regarding the handling of residual ash and other byproducts. Some participants questioned the standards used to determine acceptable risk levels and call for greater transparency and accuracy in communication about emission standards and risks. Some participants want to see comprehensive risk assessments and a clear delineation of what constitutes acceptable and unacceptable levels of risk to ensure that all potential health and environmental hazards are adequately addressed.

These sub-themes underscore the community's call for stringent health and environmental protections and greater transparency and accountability in the regulation and technological management of waste-to-energy facilities.

Other concerns and impacts

Across the two sessions there were 12 comments or questions that were not considered to sit within a specific theme. These comments have been considered in the final 'other' category. The comments captured included:

- Concerns that developers in the area should have let potential buyers know that this waste-to-energy facility was a possibility.
- Concerns about traffic management and who pays for the upkeep of the roads.
- Questions on where the power produced by the facility will go and who will buy it.
- Questions on how particular waste products will be dealt with, such as asbestos.
- A reflection that an incinerator belongs nowhere and comments regarding organising petitions.
- Impacts of noise such as the rattling of residential windows due to the operations of the facility.
- The timing in assessing the proposed site and whether it was considered before or after the approved new housing.

4. Next steps

MosaicLab will share the report with EPA and instruct EPA to deliver on the recommendations including:

- the issues that EPA need to address, both relating to this application and the engagement and communication process
- the issues EPA needs to request Cleanaway to follow up on and provide as evidence to EPA.

5. APPENDICES

Questions to be answered

The following questions were shared by participants at the two Conference of Interested Persons sessions and have been themed under similar areas of interest. It has also been identified, who needs to be responding to these questions.

EPA to seek answers and respond

Where these questions can be answered now (outside of the assessment process) it is expected that this will happen shortly after the release of this report, ideally within 4 weeks.

Community engagement and communications

- What is the EPA engagement process and timeframes going forward?
- How will EPA consider accessible and inclusive engagement i.e., information in multiple languages, use of larger venues with good access and parking?
- What does the reporting process back to the community look like so they can see how their feedback has been utilised?
- How much weight does community feedback have in the decision-making process?
- Where will the input from the community be shared?
- How has the EPA ensured their commitment to accountability concerning this proposal?
- Will there be transparency in the monitoring of emissions and the communication of findings?
- How can EPA support more meaningful engagement with better and accessible information?

Working with Traditional Owners and other stakeholders

- What is the Department of Transport and Planning doing as part of the consultation process and how does it fit with EPAs process? Is there still an opportunity for the community to engage in the planning decision?
- With the council in administration, how is (or will) EPA engage with the Whittlesea Council?
- What arrangements are in place with VicRoads for the transport of highly toxic ash wastes to their final destinations? Will VicRoads permit such transportation?
- What other organisations have been engaged in this process?
- Were state MPs invited to the meeting? If not, can another meeting be arranged?
- Has the Wollert Fire Brigade been consulted, and can these volunteers manage the potential scale of harm?

EPA integrity and authorisation

- What does EPA use as a criterion to base its assessment on?
- Who makes the final decision if there is a conflict between community sentiment and EPA approval?

- Is the EPA able to impose a substantial bond, and if not, what other alternatives are there so the Proponent is responsible for negligence?
- How does the precautionary principle apply to burning waste at an industrial facility?
- Has the EPA undertaken a full climate assessment of the Waste to Energy (W2E) incinerators?
- Will the EPA require this project to have a full public environmental impact assessment?
- Who is assessing the cumulative impact of multiple facilities across northern Melbourne?
- How does EPA compare other processes overseas and in Australia in assessing this application?
- If there is a change on ownership of Cleanaway, will the new owners be held to current EPA licenses, or will the development license process begin again?
- How does the EPA consider other government policies in their decision making?
- What financial reviews are being conducted to ensure Cleanaway can build and run the incinerator compliantly?
- How will the project address more extreme weather events like heatwaves and severe storms?

Other examples and technology

- Is incineration the best technology for waste management?
- How will the EPA address the issue of residual ash? What level of risk is acceptable to the EPA, and how is this determined?
- In Europe there are reports that waste-to-energy facilities hinder a circular economy approach. How will EPA consider this in their assessment?
- How relevant are European best practices to Australia? Are these practices being adequately adapted to our context?
- Has the forecast profit report for the project been compared to other areas? Have alternative options been considered, and what are the findings?

Policy, regulation, and compliance

- Why is an environmental impact statement not required in Victoria when it is required in every other state?
- Will there be continuous emissions monitoring systems (CEMS) with real-time reporting publicly available on the EPA's or Cleanaway's website?
- What does EPA consider when assessing applications and how they align to state and federal policies on waste management and energy?
- Is there a frequency or trigger for needing to complete a new fit and proper person assessment or re-assessment due to significant changes in matters of professional integrity, behaviour, and capacity to achieve compliance?

Health impacts and concerns

- How will the proposed Cleanaway Incinerator affect human health?
- What measures are in place to detect and remove PFAS materials in the feedstock before incineration, and how does the non-linear dose-response relationship for air pollution factor into the EPA's health impact considerations?
- What considerations are there for heavy metals and plastics being burned and how does this impact human health?

- Is there a plan for the long-term study of incinerator air toxicity effects in Wollert and the surrounding suburbs? Will there be consideration of compensation for health impacts?

Risk and safety

- What is considered to be an acceptable level of risk?

Environmental impacts

- Why is an environmental impact statement not required in Victoria when it is a requirement in every other state?
- Has the EPA undertaken a full climate assessment for this project, given that Waste-to-Energy (W2E) incinerators emit more greenhouse gases per unit of energy than coal, oil, and gas? If not, why not?

Cleanaway to respond to these questions within four weeks of receipt

Compliance with standards

- How does Cleanaway intend to comply with the latest EU standards?

Financial viability and responsibility

- What steps have Cleanaway taken to demonstrate their financial viability and credibility, particularly in relation to the Fit and Proper Person test?
- Is the land for the incinerator already owned by Cleanaway?
- Has the forecast profit report for the incinerator been compared to other areas?
- Will the incinerator need to import waste to remain efficient?
- Is the business case for the Wollert facility available publicly?

Engagement and representation

- What engagement has Cleanaway undertaken with Traditional Owners and other key stakeholders like the Whittlesea Council? Can the outputs from any engagement that has occurred be shared with the EPA?

Operations, site management and safety

- What procedures will be in place to evaluate ongoing safety compliance?
- What are the procedures for managing an emergency event and how will Cleanaway mitigate the impact on the Wollert community?
- What will be the contractual arrangements between the Wollert Incinerator and its customers, and how will these be communicated to the public?
- What is the decommissioning plan for the incinerator?
- How will the incinerator deal with the presence of lithium-ion batteries in the feedstock?
- What measures are in place to prevent leakage and contamination of groundwater, especially considering the creeks adjoining the property flow directly into the bay?
- How will fly ash be managed during storms, and what happens to the water to prevent pollution?
- With climate adaptation leading to more extreme weather events like heatwaves and severe storms, how will these be dealt with in relation to the facility's operation?
- What are the arrangements for the disposal of incinerator ash, including where it will be buried and how transport will be safely controlled?
- The traffic report prepared by Traffix only shows the proposed truck route via Summerhill Road, Amaroo Road, and Hume Fwy. What if trucks come from the east (Epping Roadside), what impacts are considered for the properties on the eastern side?
- What is the cost of the electricity the facility would produce, especially compared to clean renewable technologies
- Will the community see an updated assessment of vibration emissions from the operational equipment at the detailed design phase?
- How will the noise impact be monitored during the operations of the proposed incinerator?

Community concerns and trust

- Has Cleanaway been non-compliant in managing the health, environment, and safety impacts of other operations? If so, what will Cleanaway do differently at the Wollert site to reduce community concern on past non-compliance issues?

Location of the proposed facility

- How and why was the location for the proposed facility selected?
- Were other locations considered? If so, why were they ruled out?
- What standards are going to be used to determine what is a safe buffer zone?
- Wollert is still a developing area of homes, schools, and elderly communities, what sort of testing will prove that the residents are safe?

Fact sheets

Overview: Wollert waste-to-energy

Cleanaway Operations Pty Ltd has applied for a development licence application. The application proposes to develop a Waste to Energy facility located at 510 Summerhill Rd, Wollert VIC 3750.

The facility is designed to thermally treat 380,000 tonnes per annum of waste and generate approximately 46.3 MW gross of electricity, 4.7MW of which would be used on-site. The remaining 41.6MW will be exported to the grid as base load electricity.

EPA process so far

- Accepted the application on 31 January 2024.
- Published the application for public consultation between 24 February and 14 April 2024.
- Issued four requests for further information between 11 April and 3 May 2024.
- Received Cleanaway's responses to all requests on 29 May 2024, which are currently under review for acceptance.
- Conference of interested parties on 20 and 25 June 2024.
- Continuing collecting information and undertaking assessment.

Proposal overview

- The waste to energy facility will use moving grate incineration technology and produce energy from the combustion of waste heat.
- Incoming material will be residual MSW (municipal solid waste) and residual C&I (commercial and industrial) waste.
- The receival hall and storage bunker will be enclosed with an odour collection and treatment system.

- The proposal includes facilities for maturation and processing of incinerator bottom ash (IBA) generated from combustion of waste. IBA will be used to produce an aggregate product suitable for road construction.
- The proposal includes a series of treatment systems to clean flue gas before discharge via a 60m-high stack.
- A continuous emission monitoring system for flue gas is included in the proposal.
- It is predicted that Air pollutants emission levels will be within the upper end of the range of *European Best Available Technology air emission concentrations* reference document.
- Finished floor levels of buildings will be above the 1 in 100 flood event.
- A closed loop wastewater treatment system is included in the design of the facility. This system aims to prevent discharge of process wastewater during routine operations.
- Stormwater will be collected and treated prior to its off-site discharge.
- Main noise sources on-site will include the fixed plant operating as part of the main processing facility, as well as truck movements.
- It is proposed to operate 24 hours a day with truck deliveries between 6 am and 6 pm from Monday – Saturday.
- The site is located within a farming zone. The nearest residential property is ~110m to the site. The nearest residential zoned area and school is 2km and 4km away, respectively.

Health impacts from air emissions and odour: Wollert waste-to-energy

1. Air emissions and odour

Definition

- Potential emissions to Air from incineration of wastes and odour emissions from handling of waste as part of the waste-to-energy process.
- The impact on air quality around the site from this proposal, and the impacts of pollutants on public health, including how they are reduced, managed, and monitored.

2. EPA's role

- EPA's role is to ensure that the proposal complies with the relevant legislative requirements.
- We assess the application in accordance with:
    - Environment Protection Act 2017
    - Environment Protection Regulations 2021
    - Environmental Reference Standards.
- The Environment Protection Act 2017 outlines specific requirements to ensure we protect human health and the environment.
- The applicant must use the best technology and procedures available to minimise pollution to air.

3. EPA's key assessment considerations

- The health and environmental impacts of air emissions during construction and operational phases.
- The design, function and control of the air treatment system and monitoring.
- Efficiency of the proposed air pollution control system and possible alternative controls.
- Assessment of air emission modelling.

- Monitoring in different parts of the plant and the functionality of that monitoring.
- Odour emissions and control and contingency measures.
- Incoming waste feedstock quality control and management.

4. **Points to consider:**
   - What are the main points you believe should be considered as part of this application?
   - What additional measures might reduce/eliminate your concerns in this topic area?
   - What further questions/concerns do you have about this application for either EPA or the applicant to consider?

Environmental impacts to land and water: Wollert waste-to-energy

1. Overview

Definition

- Environmental impacts to land related to management of contaminated stormwater and/or process water and storage of chemical materials and wastes during the construction and operation.

2. EPA's role

- EPA's role is to ensure that the proposal complies with the relevant legislative requirements.
- We assess the application in accordance with:
    - Environment Protection Act 2017
    - Environment Protection Regulations 2021
    - Environmental Reference Standards.
- The Environment Protection Act 2017 outlines specific requirements to ensure we protect human health and the environment.
- The applicant must use the best tools and procedures available to minimise pollution to land and water.

3. EPA's key assessment considerations

- Ensure process wastewater and contaminated stormwater are properly managed, treated and there are appropriate contingency measures during the operation of the facility.
- Ensure the facility is designed to prevent any spillage or leakage of process water.
- Emergency management procedures to be deployed in case of accidental emissions to land and water.
- Monitoring of surrounding land and water quality.
- Concerns and impacts on the local community.

4. Role of other agencies

- Melbourne Water is responsible for managing this water catchment.
- Local council.

5. Points to consider:

- What are the main points you believe should be considered as part of this application?
- What additional measures might reduce/eliminate your concerns?
- What further questions/concerns do you have about this application for either EPA or the applicant to consider?

Noise due to operations: Wollert waste-to-energy

1. Overview

Definition

- Operational noise emissions, their control, management, and monitoring, as well as the impact on the everyday life of residents, environmental values, and enjoyment of natural areas.

2. EPA's role

- EPA's role is to ensure the proposal complies with the relevant legislative requirements, while also using the best tools and procedures available to control noise emissions.
- We assess the application in accordance with:
  - Environment Protection Act 2017
  - Environment Protection Regulations 2021
  - Environmental Reference Standards.
- Guidelines and protocols used for the assessment include, but are not limited to:
  - Commerce, industry and trade noise guidelines (https://www.epa.vic.gov.au/for-business/find-a-topic/noise-guidance-for-businesses/commerce-industry-and-trade-noise-guidelines).
  - Unreasonable noise guidelines (https://www.epa.vic.gov.au/for-business/find-a-topic/noise-guidance-for-businesses/unreasonable-noise-guidelines).
  - Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues (Noise Protocol publication 1826.4).
  - Noise guidelines: Assessing low frequency noise (publication 1996).
  - Technical guide: Measuring and analysing industry noise and music noise (publication 1997).
  - Civil construction, building and demolition guide (publication 1834.1).

3. EPA's key assessment considerations

- Determination of background measurements and noise limits.

- Noise impact modelling, including cumulative noise impacts, character adjustments and low frequency noise.
- General Environmental Duty and noise controls.

4. Points to consider:

- What are the main points you believe should be considered as part of this application?
- What additional measures might reduce/eliminate your concerns in this topic area?
- What further questions/concerns do you have about this application for either EPA or the applicant to consider?

Greenhouse gas and climate change: Wollert waste-to- energy

1. Overview

Definition

- Greenhouse gas emissions during construction and operation and measures to manage climate change impacts.

2. EPA's role

- EPA's role is to ensure that the proposal complies with the relevant legislative requirements.
- We assess the application in accordance with:
    - Environment Protection Act 2017
    - Environment Protection Regulations 2021
    - Environmental Reference Standards
    - Climate Change Act 2017.
- EPA must ensure the proposal will use the best tools and procedures available to minimise greenhouse gases and climate change impacts.

3. EPA's key assessment considerations

- Assessment of greenhouse gas calculations, including minimisation and control during construction and operation.
- Identification and evaluation of opportunities to reduce greenhouse gas emissions.
- Assessing the impacts from climate change on the facility.
- Concerns and impacts raised by the local community.

4. Role of other agencies

- The Department of Energy, Environment and Climate Action provides a range of services, including climate action.

5. Key points to consider:

- What are the main points you believe should be considered as part of this application?
- What additional measures might reduce/eliminate your concerns in this topic area?
- What further questions/concerns do you have about this application for either EPA or the applicant to consider?

Waste Management: Wollert waste-to-energy

1. Overview

Definition

- Management of incoming waste feedstock for processing and waste generated by the facility during construction, commissioning, and operation.

2. EPA's role

- EPA's role is to ensure that the proposal complies with the relevant legislative requirements.
- We assess the application in accordance with:
  - Environment Protection Act 2017
  - Environment Protection Regulations 2021
  - Environmental Reference Standards
  - Climate Change Act 2017.
- Guidelines and protocols used for the assessment include, but are not limited to:
  - EPA Publication 1756.2 - Summary of Waste Framework
  - EPA Publication 1827.2 - Waste Classification Assessment Protocol
  - EPA Publication 1828.2 - Waste disposal categories – characteristics and thresholds.

3. EPA's key considerations during assessment

- Assessing the storage and treatment of Incinerator Bottom Ash.
- Minimising risks associated with waste reuse as construction material and/or final disposal.
- Ensure that the design and operation of the waste treatment facility will not cause risk of harm to the environment.

4. Roles of other agencies

- Recycling Victoria provides licence capping.
- Department of Energy, Environment and Climate Action implements policy, regulations and legislation for waste and recycling.

5. Key points to consider:

- What are the main points you believe should be considered as part of this application?
- What additional measures might reduce/eliminate your concerns?

What further questions/concerns do you have about this application.

PLEASE NOTE:

This report has been prepared by MosaicLab on behalf of and for the exclusive use of the Environment Protection Authority (EPA). The sole purpose of this report is to provide EPA with feedback received at the Conferences of Interested Peoples on the 20th and 25th June 2024.

This report has been prepared in accordance with the scope of services set out by the EPA and the scope as defined in the *Environment Protection Act 2017*. In preparing this report, MosaicLab has relied upon the information provided by the participants at the conferences. EPA can choose to share and distribute this report as they see fit. MosaicLab accepts no liability or responsibility whatsoever for or in respect of any use of or reliance upon this report by any third party.

MosaicLab is a Victorian-based consultancy that specialises in community and stakeholder engagement, facilitation, negotiation, strategic planning, and coaching.

REPORT PREPARED BY:

mosaicLAB

www.mosaiclab.com.au