



environmentally concerned citizens of orange
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12th November, 2009

Major Development Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sirs

Orange Resource Recovery and Waste Management Project Environmental Assessment

Environmentally Concerned Citizens of Orange (ECCO) unanimously passed a resolution objecting to the Proposal as outlined in the Environmental Assessment, at a Public Meeting held in Orange on the 28 October, 2009. Our objections principally relate to the proposed landfill and composting facility at the Euchareena Road component of the proposal, and the lost opportunity to develop a truly regional solution utilising innovative technology for waste to energy conversion and/or composting and/or biochar production, and residual compacted baled waste going to a more strategically located and environmentally friendly site.

ECCO's main objections are:

- The Proposal is not a regional solution to waste management.
- The Euchareena Road site is not suitable, and impacts on agricultural productivity.
- The Proposal is totally dependent on road transport.
- The location of the composting facility is distant from the main source of green waste and potential urban and horticultural markets for compost.

1. Not a Regional Solution.

ECCO contends that the Proposal should not have been considered a part 3A Project in the first place as the Project is not of State or Regional significance.

The Proposal is misleading and deceptive in that it repeatedly claims that the Project will be used by other regional Councils; eg. Cabonne, Parkes, Forbes, Wellington, Dubbo, Blayney, Cowra and Bathurst, implying that this is the basis for regional significance. However, at the present time, there is no interest or commitment from any other local government area to participate in, or deliver waste to this Project, other than the pre-existing arrangement with several other Councils to deliver recyclables to Orange City Council's Materials Recycling Facility at the Ophir Road site. In fact, other Council's are actively pursuing their own joint waste solutions quite independent of Orange.

2. Euchareena Road Site is Unsuitable.

That part of the site which is designated for landfill is prime agricultural cropping land, as evident in adjoining paddocks of the same soil profile, and which are currently carrying high yielding cereal crops. The Proposal dismisses as insignificant the loss of cropping for the life of the site . At a time when every available piece of prime agricultural land will be needed to feed an expanding population such dismissal is inappropriate and irresponsible given the increasing scarcity of good cropping land in reliable rainfall areas. The proposed rehabilitation of the landfill areas will not result in a return to quality land, and so the cropping ability of the land will be lost forever.

The permeable nature of the soil profile places at risk aquifers and adjoining catchments should leachates ovetop the landfill cells during periods of rainfall inundation, or the membrane liners are penetrated.

3. Dependence on Road Transport.

The proposed Euchareena Road site for the landfill and composting components of the Project is approximately 50 kilometres from the source of the municipal waste and green waste which is all to be trucked to the site from Orange, and the site is therefore considered to be an inappropriate location.

The utilisation of road transport over long distances will be environmentally damaging and costly, largely due to the cost of fuel and the carbon emissions from at least 58 daily truck movements which could easily escalate during the 40 year life of the facility.

The truck movements present significant safety threats to the large number of persons regularly using the Mitchell Highway and the Euchareena Road, including rural landholders and school buses in and around both Orange and Molong.

The transport of baled waste, green waste and biosolids from Orange to Euchareena Road, and the delivery of leachate and compost from the site to Orange will result in an unacceptable number of daily truck movements on the winding Mitchell Highway and the very narrow Euchareena Road. Both roads are quite unsuited to such frequent movements.

4. Location of the Composting Facility.

The Proposal locates a tunnel composting facility on the Euchareena Road site, to receive food, garden and commercial green waste, and biosolids from Orange. This essentially indoor industrial process is odour free and could be located at the existing Ophir Road site or in an industrial area close to the major sources of food and green waste in or near Orange and in close proximity to local urban and horticultural markets. Proximity to rail transport in Orange would enhance the distribution opportunities for the final product and the environmental credentials of the proposal.

Opportunity for an Alternative Waste Management Strategy.

The rejection of the Proposal would present an opportunity to implement a truly innovative waste management strategy that could serve the two major regional centres, Bathurst and Orange, well into the future.

The adoption of baling and composting processes as part of the current Proposal, in fact provides the opportunity to co-locate these processes, and to seek a landfill component in a far more appropriate location, some of which are identified in the Site Selection Study by Mr Robert Amaral, which is less dependent on lengthy road transport. There is no valid reason to locate

the composting facility and landfill together at the Euchareena road site, thus opening up a range of alternative opportunities.

The adoption of baling and composting, together with increased recycling will result in significant improvement in the diversion of waste from landfill, and has the potential to increase the life of the existing Ophir Road landfill site, while alternatives are investigated.

The opportunity to develop a waste management strategy that includes cooperation with Bathurst Regional Council and Australian Native Landscapes (ANL is located in close proximity to both Orange and Bathurst) is an alternative strategy that should be investigated. For example, Bathurst Regional Council currently delivers recyclables to the Ophir Road Materials Recycling Facility in large trucks, which return empty to Bathurst. It might be possible to backload these trucks with green waste to be delivered to the existing ANL composting facility at Brown's Creek. Another alternative would be to investigate a joint initiative with Bathurst which offers the economies of scale necessary for a waste-to-energy and or biochar plant to service the whole region.

Conclusion.

Environmentally Concerned Citizens of Orange strongly objects to the Proposal on the grounds listed above, and calls on the Minister to reject the Proposal and require Orange City Council to investigate a more environmentally sustainable and regionally beneficial Waste Management Project which has widespread community acceptance.

ECCO would also like to have a representative speak at the Public Hearing.

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