

24 May 2022

Cleanaway Waste Management Ltd

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Mr Lee Webb  
Senior Specialist (Environmental) Planner – Crown and Major Development  
Planning and Land Use Services Branch  
Attorney-General's Department

Dear Lee,

## Response to Submissions

**Inkerman Landfill Major Development – Northward Fill Masterplan AEIS**  
Development Reference: 373/P001/18

## Introduction

Cleanaway thanks the Attorney-General's Department (AGD) for the opportunity to consider and respond to the submissions received from the public and referral agencies in relation to the development assessment of Cleanaway's amendment to the EIS which includes the Inkerman Masterplan. We have prepared this document in response to correspondence dated 13 April 2022 received from Mr Lee Webb of the AGD.

The documents submitted for development assessment were:

- The Inkerman Resource Recovery Centre Masterplan (reference 0127CWYR006A); and
- The Inkerman Resource Recovery Centre Amendment to the EIS (reference 0127CWYR009A).

## Context

The Masterplan and Amendment to the EIS are complementary documents. The Inkerman Masterplan articulates Cleanaway's vision for the facility as it transitions from a landfill to a resource recovery centre. As a visionary document, the Masterplan identifies potential opportunities which support the waste hierarchy and sustainability objectives held by stakeholders including State and local government. The Amendment to the EIS identifies environmental risks and mitigation measures in relation to the opportunities documented in the Masterplan.

Our submissions are not documents which make application for the implementation of the opportunities identified, rather they establish a new narrative for the Inkerman operations which aligns with Cleanaway's mission to Make a Sustainable Future Possible Together. To progress our initiatives a range of statutory approvals will be required, and they will be sought in future. We have articulated our initiatives in conceptual form for these reasons.

Our response to each submission received by the AGD from the period of consultation are as follows:

#### **Inkerman Landfill Community Reference Group (ILCRG)**

We welcome the ILCRG's feedback and note the assessment process is statutory and is managed by the AGD. Cleanaway is unable to influence the timeliness of the consultation period or the duration in which it was open. Notwithstanding, our submission is conceptual in nature and the Community Fact Sheet previously distributed to our stakeholders set out Cleanaway's Masterplan objectives and staged approach. This was an introduction and can be considered an executive summary supportive of our vision for the Inkerman facility.

Given the visionary nature of the submission, specific detail regarding the proposed activities will be provided when formal application for these activities is made. This includes the detailed design, environmental assessment and stakeholder engaged as required. We confirm, our submission does not seek approval to undertake the receipt or treatment of high-level contaminated waste.

#### **B&D Mudge**

As a neighbouring landowner with cereal and livestock, you identify Cleanaway's site activities and environment protection measures as primary concerns. Cleanaway's approach to the implementation of any initiative within the Masterplan will include the preparation of detailed design documentation, environmental risk assessment and stakeholder engagement as part of future regulatory approvals processes. Our submission does not seek approval to undertake the receipt and treatment of high-level contaminated waste.

The proposed location of a future leachate pond along Menadue Road has not changed from the initial concept design approved by the State Governor in 1999. As the site progressively develops, the location of infrastructure such as leachate and stormwater ponds will be subject to detailed design and regulatory approval.

The Masterplan and Amendment to the EIS intend to illustrate Cleanaway's resource recovery vision noting that the activities identified will be subject to future approvals processes and environmental controls as required by the regulators.

#### **JM Stewart**

Cleanaway agrees that the Masterplan and EIS documentation submitted for assessment are not concise in detail. This is due to the visionary nature of the documents and the fact they are not application documents proposing the commencement of any of the opportunities identified. We further agree that when Cleanaway seeks to progress these initiatives, specific applications will be prepared and lodged with the relevant regulators inclusive of detailed design, environmental assessment and stakeholder engagement as required.

While we refer to Cleanaway as the owner and operator of the site, it is prudent to acknowledge Waste Management Pacific (SA) Pty Ltd (WMP) holds the licence for the Inkerman facility. WMP is one of the companies in the broader Cleanaway business.

Cleanaway notes the copies of the Environment Protection Orders served by the EPA on an unrelated waste management entity. We accept our obligations under the Environment Protection Act and commit to our environment protection obligations. We confirm, our submission does not seek approval to undertake the receipt or treatment of high-level contaminated waste.

#### **Environment Protection Authority (EPA)**

Cleanaway notes the EPA's assessment and comments provided. The Masterplan is conceptual in nature which explains the concept level detail provided. Although conceptual, we followed the advice provided by the Department for Infrastructure and Transport prior to the commencement of the development assessment. The AGD is now managing this matter and required the Masterplan be

subject to development assessment, which necessitated the preparation of the Amendment to the EIS. When Cleanaway seeks to progress individual initiatives, we will follow the necessary regulatory pathways which will include the preparation and submission of application documentation, detailed designs, environmental assessments, and stakeholder engagement as required.

**Wakefield Regional Council (WRC)**

We are pleased WRC has identified the synergies between the Masterplan and Council’s strategic community plan – Wakefield 2030. The Masterplan is conceptual and all statutory approval processes will be followed when Cleanaway seeks to progress the initiatives identified in the Masterplan. At this time relevant environmental and risk assessments will be completed.

Our submission is not seeking approval for Cleanaway to commence receipt and treatment of high-level contaminated waste.

**Conclusion**

Cleanaway is excited about the opportunity to evolve our Inkerman operations to include resource recovery activities in an environmentally responsible matter, with the required statutory approvals and oversight. Continuing to operate a landfill without contributing to the circular economy and supporting local, state and Commonwealth government sustainability strategies no longer aligns with Cleanaway’s business vision to Make a Sustainable Future Possible Together. We welcome the opportunity to prepare additional project information prior to pursuing our Masterplan initiatives.

By following the required development assessment process, we seek acceptance of our vision for the Inkerman facility.

Should you have any further questions in relation to this submission or the subject matter, please don’t hesitate to contact Thomas Gallasch and/or David Leaney on the contact details below.

David Leaney Regional Manager	Thomas Gallasch Engineering Manager
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Yours sincerely

Regional Manager

CC: Simon Neldner