



WESTERN
SOIL TREATMENT
Processing & Rehabilitation



MADDINGLEY
BROWN COAL
Landfill & Resource Recovery Operations

Stakeholder and Community Engagement Summary

August 2020

Stakeholder Engagement

Introduction

Maddingley Brown Coal (MBC) is a designated Waste Hub of State Significance and experienced landfill operator. MBC is a tenderer for a contract to develop a facility known as Western Soil Treatment Pty Ltd, to receive, manage and dispose of spoil generated by the West Gate Tunnel Project (WGTP).

More than 2.3 million cubic metres of soil and rock will be removed during construction of the WGTP, an estimated 1.5 million cubic metres of which will be generated by tunnelling. Analysis of samples has identified that some of the soil is contaminated with low levels of [poly-fluoro alkyl](#) substances (PFAS).

Such soil must be disposed of at a suitably approved facility.

MBC applied for a Ministerial Planning Scheme Amendment under the provisions of s20(4) of the *Planning and Environment Act 1987*. It has also submitted an Environmental Management Plan (EMP) to Environment Protection Authority Victorian (EPA) for approval.

Stakeholder engagement was initially conducted by MBC in February and March 2020, and has continued throughout the application and approvals process. In response to the feedback received during consultation with stakeholders and the community, MBC has made a number of changes to the proposal.

The purpose of this document is to summarise key stakeholder and community engagement activities, the predominant themes of stakeholder and community feedback and how these have been addressed.

Stakeholders engaged

Stakeholder category	Stakeholder
Community and environment groups	Residents and community groups Maddingley Brown Coal Community Consultative Committee Bacchus Marsh RSL Moorabool Environment group, consisting of: <ul style="list-style-type: none"> - Moorabool Landcare Network - Friends of the Werribee River through Bacchus Marsh - Parwan Landcare Group Werribee River Association / Werribee River Keeper
Local Government	Moorabool Shire Council
State Government and agencies	Department of Transport Environment Protection Authority (EPA) Department of Environment, Land, Water and Planning Country Fire Association (CFA) Southern Rural Water Metropolitan Waste and Resource Recovery Group Grampians Central West Waste and Resource Recovery Group
School	Bacchus Marsh Grammar School
Local businesses	Representatives from businesses including nearby agricultural, transport, farming and other companies.
Local growers	Representatives from local apple, strawberry and vegetable farms; farm and stockfeed suppliers, plant and orchard owners

Engagement activities

A range of engagement activities were undertaken to give community and other stakeholders an opportunity to learn more about the proposal and share their feedback with MBC representatives and WGTP parties.

Government agency engagement

MBC engaged with several Victorian Government departments, agencies and authorities, as well as Moorabool Shire Council, to help inform the development of the proposal and preparation of the required approvals applications.

MBC notes that in addition to its own engagement activities, the Minister for Planning also exercised the provisions of s20(5) of the *Planning and Environment Act* (1987) to conduct statutory consultation with Moorabool Shire Council over a four-week period in June and July 2020.

Community information sessions and information stands

Four community engagement events were held at various local locations on weekdays and on the weekend to enable a broad cross section of the community to attend. More than 200 people attended these sessions

The events were promoted via advertisements in the Moorabool News and via the Calleja Group website.

Information about MBC's proposal was provided as well as opportunities to answer questions and address concerns with staff from MBC and WGTP representatives. Subject matter experts were available at community information sessions such as representatives from EnRiskS, the specialist consultants responsible for undertaking the human health and environmental assessments of MBC's proposal, and from Traffix, the specialist consultants responsible for undertaking the transport impact assessments.

Information available at these sessions and events included:

- MBC's soil management proposal
- Traffic and transport information including haulage routes and estimated truck movements
- Considerations and information about the West Gate Tunnel Project.

Local stakeholder briefings

Targeted stakeholder briefings were held with local businesses, community and environment groups and impacted stakeholders, and provided information about the project and MBC's proposal.

Representatives from MBC and the WGTP team were available. The briefings included a presentation by the project team and MBC, and provided stakeholders with an opportunity to ask questions and raise issues or concerns directly with the project team.

Engagement undertaken

Activity	Location and date	Promotion and/or attendance
Community information sessions	Darley Civic and Community Hub 5 and 12 March 2020	Advertised through local media and attended by project partners from MBC, WGTP. EnRiskS and Traffix representatives also attended the community sessions.
Community pop-up stands	Darley Market – 7 March 2020 Harvest Festival – 8 March 2020	
Targeted stakeholder briefings	Moorabool Shire Council CEO briefing –10 February 2020 Councillor briefing –19 February 2020	WGTP, MBC, EnRiskS, MSC CEO and Executive Officers, MSC Councillors
	Bacchus Marsh Grammar School Principal briefing –14 February 2020 Principal briefing – 06 March 2020	MBC, Bacchus Marsh Grammar School, WGTP and EnRiskS
	Metropolitan Waste and Resource Recovery Group 20 February 2020	MBC, MWRRG representatives
	Grampians Central West Waste and Resource Recovery Group 24 February 2020	MBC, Grampians Central West WRRG
	Country Fire Authority (CFA) 25 February 2020	MBC, CFA Region 15 Operations Manager, EnRiskS
	Southern Rural Water 26 February 2020	MBC and the Manager, Water Resources & Central Region Operations, Southern Rural Water
	Maddingley Brown Coal Community Consultative Committee (MBCCC) 26 February 2020	MBC, MBCCC, Transurban

Activity	Location and date	Promotion and/or attendance
	Moorabool Environment Group (MEG) 2 March 2020	WGTP, MBC, EnRiskS, 14 x MEG representatives
Local community and business group briefings	Local growers 3 March 2020	WGTP, MBC, EnRiskS, 13 representatives from local growers
	Local businesses 6 March 2020	WGTP, MBC, and representatives from local businesses
Website	MBC project website March 2020 - continuing	Community using online form to provide feedback and ask questions, MBC continuing to respond to enquiries
Meetings, phone calls, emails	MBC and the WGTP parties with community and stakeholders Ongoing	Contact details on Calleja website and WGTP website Follow-up from stakeholder briefings and information sessions

Feedback by theme

Key theme	Issues raised	How does the proposal address the issue?
<p>Unique local context of Bacchus Marsh</p>	<p>Bacchus Marsh is an important food growing area that supplies fresh produce to supermarkets and consumers all over Australia.</p> <p>Local stakeholders emphasised the importance of protecting this supply chain, from any potential impact to produce from contaminants, as well as avoiding impacts to the local economy through possible negative perceptions of the area.</p> <p>Local people value the liveability of the area and its surrounds, including its history, community and environment. It is important to ensure this is preserved and perceptions of the area are not impacted.</p>	<p>The proposal is designed to eliminate the risk of off-site impacts.</p> <p>Since March, a number of changes have been made to the proposal to further reduce the already-low risks. These include:</p> <ul style="list-style-type: none"> - Construction and testing of storage bays, which were proven effective - Additional layers of lining in the containment cell design - A wastewater treatment plant to remove traces of PFAS, leaving clean water that meets drinking standards. <p>More information about these measures can be found in the approved Environmental Management Plan.</p>
<p>Assessment of risks to human health and the environment</p>	<p>Due to the proximity of Bacchus Marsh to the Fiskville CFA site, many community members are aware of, or have a perception of PFAS in general.</p> <p>The potential for impacts to human health and the environment need to be adequately acknowledged.</p> <p>Questions were raised about potential for contamination to transfer beyond MBC's facility, either as a result of onsite soil management procedures or a lack of adequate infrastructure and the</p>	<p>The level of expected contamination is far lower than that found at the Fiskville site.</p> <p>Nevertheless, the development of the facility and its design has been risk-based.</p> <p>The facility includes a range of measures designed to further reduce the already low risk of offsite impacts, including contamination.</p> <p>Potential for offsite contamination, including to Parwan Creek, was considered in the context of the facility and its proposed design and found to be "very unlikely"</p> <p>The Environmental Management Plan details how the facility will be operated in</p>

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	<p>potential risk to human health and the environment.</p> <p>Concerns also about potential groundwater contamination leading to contamination of the Parwan Creek and Werribee River systems that contribute significantly to the prosperity of the local farming and produce industries.</p> <p>Whether the assessments undertaken considered international standards.</p> <p>Capability or integrity of independent consultants undertaking work on behalf of MBC and WGTP.</p> <p>Requests and questions about how human health checks and monitoring will be done.</p> <p>Impact on the environment, including the Parwan Creek and Werribee River, trees in the Avenue of Honour.</p> <p>A number of native flora and fauna are located on-site and in the surrounding Bacchus Marsh area and it is important that impacts be minimised, if not eliminated to ensure they continue to thrive.</p>	<p>accordance with EPA requirements, which includes specific regulations for managing tunnel spoil and regular monitoring and auditing by an EPA-appointed independent auditor.</p> <p>The Environmental Management Plan details how potential impacts from noise, traffic, groundwater, wastewater, soil and air quality will be monitored and how requirements will be met and reported.</p> <p>Detailed, peer-reviewed studies determined there would be no adverse impacts on native flora and fauna.</p> <p>More information about these measures can be found in the approved Environmental Management Plan.</p>
<p>Impacts and safety of transport and haulage routes and options</p>	<p>Local traffic is already under pressure and the potential increase in truck traffic due to vehicles accessing the site may cause further strain on local traffic flow and add to congestion.</p>	<p>The proposal includes a detailed Traffic Impact Assessment that considers the potential impacts of increased truck movements, and details required upgrades that need to occur before the project proceeds.</p>

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	<p>Safety concerns associated with increased truck traffic, in particular pedestrian safety given the proximity of the site to a nearby school.</p> <p>Potential conflict between truck traffic to the MBC site and community events that require road closures.</p> <p>Concerns that the roads used to access the site are not in a condition to withstand the proposed increase in traffic.</p> <p>Suggestions for road condition surveys to be undertaken and an agreement made for repair and maintenance to the roads as part of the proposal.</p> <p>There is potential conflict between planned road projects and necessary upgrades to accommodate the additional truck traffic.</p> <p>Concerns about the potential for impacts from pollution and compaction from increased trucks to trees lining the Avenue of Honour.</p>	<p>The TIA stipulates works that include upgrades to lighting, signs, intersections and to restore road condition at the end of the project.</p> <p>In response to concerns regarding potential impacts on the Avenue of Honour, additional studies were commissioned and completed by qualified arborists. These studies found there would be no adverse impact to the Avenue or its trees.</p>
Community consultation and information available	The community consultation undertaken did not meet expectations in regard to frequency, timing, promotion and type of consultation activities.	Information sessions were designed to explain MBC's proposal so community members could speak directly with MBC representatives and enable questions and concerns to be raised. This approach provides people with the opportunity to

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	<p>There is no clear commitment to how community will be engaged on an ongoing basis.</p> <p>Concerns there is a lack of transparency with information and availability of information to the community directly, and clarification sought in regard to the roles of the government, Transurban, WGTP builder and MBC in the planning and approvals process.</p> <p>Feedback that there has been a lack of clear communication of PFAS concentrations using language that people can understand.</p> <p>General community concern over existing MBC operations.</p>	<p>obtain information, engage in discussion and give everyone a chance to have a say. MBC's proposal was subject to the strict requirements of the tender process that did not enable the release of documents that would otherwise be publicly available. MBC notes the concerns regarding a lack of transparency .</p> <p>In response to these concerns, MBC has:</p> <ul style="list-style-type: none"> - Appointed a dedicated Community Liaison Officer to assist with community and stakeholder engagement for this project - Commissioned a new website with project information and updates, including engagement opportunities - Commissioned a 24-hour, seven day a week hotline to receive and respond to enquiries - Established an email address to respond to enquiries.
Amenity impacts	<p>Range of concerns about potential impacts on amenity from 24-hour operation of the facility and constant truck movements, including increased noise.</p> <p>Concern over management of impacts like dust, litter, noise, visual impacts and odour.</p> <p>Impacts on sensitive neighbouring sites, including the Bacchus Marsh Grammar School and local farmers.</p>	<p>The Environmental Management Plan details how the facility will be operated in accordance with EPA requirements, which include specific regulations for managing tunnel spoil and regular monitoring and auditing by an EPA-appointed independent auditor.</p> <p>The Environmental Management Plan details how potential impacts from noise, traffic, groundwater, wastewater, soil and air quality will be monitored and how requirements will be met and reported.</p> <p>Detailed, peer-reviewed studies determined there would be no adverse impacts on native flora and fauna.</p>

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		<p>Measures to reduce amenity impacts include:</p> <ul style="list-style-type: none"> - Reducing, to the extent that it is possible, the amount of staff and work onsite overnight - Construction of amenity bunds to reduce visual and noise impacts - Daily air and dust monitoring to ensure rapid response to any issues. - Dust suppression to be conducted using only water that meets drinking water standards (<0.07mg/L PFAS) - Noise reduction strategies for construction and operation (detailed on pages 83-85 of the EMP)

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<p>Soil classification and management, EPA process and spoil contamination concerns</p>	<p>Questions around the proposed process for soil classification.</p> <p>Volume and management of soils to be received.</p> <p>Design and construction of the containment cell.</p> <p>Whether flooding risks been considered in the design of the project.</p> <p>General distrust in EPA's ability to ensure MBC comply with licence conditions.</p> <p>Broad range of questions as well as general concerns about PFAS-affected soil being disposed of in the area.</p> <p>Questions about the type and concentrations of contaminants in waste soil and concerns around toxicity of material.</p> <p>Concern that the MBC will continue to receive PFAS impacted material from other projects once WGTP is completed.</p>	<p>MBC's proposal has been developed based on data provided by the West Gate Tunnel Project's builders, which indicates that, of the approximately 104 groundwater bores identified for investigation, only three contained PFAS greater than 0.07 µg/L in groundwater (EMP, page 42) – this is above the recommended drinking level but below the level considered safe for daily swimming.</p> <p>The development of the proposal has been risk based and tested to ensure it will operate beyond the limits of any worst-case scenario. It has been found to be safe for contamination levels much higher than those anticipated.</p> <p>The design of the storage bays and containment cells have been tested, and additional layers of lining have been added to the containment cell (EMP, page 55).</p> <p>The EPA's waste classifications for the West Gate Tunnel Project are detailed on page 38 of the EMP.</p> <p>The EMP has been developed to meet the requirements of new EPA regulations specifically designed for the safe management of tunnel spoil. The EPA will oversee the facility in line with these regulations and the operation will be overseen by an independent EPA-appointed auditor.</p> <p>This project and the approvals for it relate only to the West Gate Tunnel Project. The facility will close and the land rehabilitated once the project concludes.</p>