



Mr Lee Miezis  
Chief Executive Officer  
EPA Victoria  
200 Victoria Street  
CARLTON VIC 3053

17 February 2023

Email: [planningpolicy@epa.vic.gov.au](mailto:planningpolicy@epa.vic.gov.au)

Dear Mr Miezis

**Re: Draft Separation distance guideline and draft Landfill buffer guideline**

Thank you for the opportunity to provide feedback on the EPA's draft *Separation distance guideline* and draft *Landfill buffer guideline*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the peak national body for all stakeholders in Australia's \$15.8 billion waste and resource recovery (WARR) industry. WMRR has more than 2,000 members across the nation, representing the breadth and depth of the sector, spanning business organisations, the three (3) tiers of government, universities, and NGOs. The sector drives jobs – employing up to 50,000 people – and investment in the Australian economy, and WMRR's purpose is to lead the success of this essential industry while ensuring the environment and community are protected through the safe and responsible management of waste and resources.

WMRR acknowledges the work undertaken by the EPA in developing these guidelines, and their ongoing efforts to consult with industry. WMRR has been advocating for the enforcement and maintenance of separation distances and buffer zones in Victoria since 2019 to combat the risk of encroachment on the essential infrastructure that our industry provides and to enable good land-use planning and amenity.

The Victorian Statewide Waste and Resource Recovery Infrastructure Plan (SWRRIP) adopted by the Victorian Government in 2018, recognised the need for the right network of infrastructure to manage and recover the increasing amounts of materials being generated by the growing population. The goal of the SWRRIP is to ensure that there was a state-wide approach that ensured the delivery of a strategic waste and resource recovery network that protects the environment, maximises recovery and minimises the long-term costs on household, industry and the community.

As you would be aware, Victoria continues to send over 5.7 million tonnes of material to landfill each year (representing about 33% of waste material that is collected and managed in Victoria), which is a significant volume, with the remaining over 11 million tonnes being received at a network of resource recovery facilities across Victoria. The vast amount of this material is collected within the Metropolitan Melbourne Region, where there is dense population and limited available land mass. To manage the challenges of land, transportation, amenity and cost, the WARR sector relies heavily on a

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037

(02) 8746 5000  
INFO@WMRR.ASN.AU

**WMRR.ASN.AU**



network of transfer facilities to aggregate materials and then move to destinations such as landfills and MRFs (this is referred to as a 'hub and spoke' model). The SWIRRP recognised the importance of these WARR hubs and spokes.

WMRR is concerned that the draft documents on consultation, will negatively impact the ability of State and the Industry to create and deliver hubs and necessary WARR Infrastructure going forward in Victoria when the areas specified have in most instances doubled (to 500 metres) and in relation to landfill is now 1500 metres. WMRR also understands that the buffers are to be applied equally to *new, expanding, or varied landfill*, and to new or varied use, we believe it would be almost impossible to expand any existing facility with this approach in place. The distance specified for these separation areas are unworkable for both existing and new facilities, it will mean that as an industry we will be unable to develop facilities (including transfer stations) adjacent to where the material is generated (in accord with the Proximity Principle) and will result in significant financial burden being placed on not just industry but the broader economy we support given the materials we manage.

Whilst acknowledging the need for adequate buffer distances between waste and resource recovery facilities and sensitive receptors, we feel that the guidelines proposed do not provide adequate clarity of their application, particularly, in instances where there are existing management plans (such as odour for example) or alternative methods (such as waste acceptance protocols, rapid rise doors, negative air pressure, and air exchange and stack design) to mitigate any potential operational impacts to the environment and sensitive receptors

WMRR is of the view that the existing buffers are sufficient in most instances, and the increased articulation of distances in this policy, will simply result in increased appeals to the Victorian Civil and Administrative Tribunal resulting in increased cost and time to develop this necessary infrastructure. WMRR would argue that what is required is the enforcement of the exiting buffers, we do not consider it necessary to add further barriers to development particularly if we are genuine in our goal to reach 80% diversion by 2030.

WMRR would appreciate the opportunity to meet and discuss our submission with you and understand how industry and the EPA can work together to meet the objectives of preserving amenity, protecting health and managing these materials in a way that does not create additional challenges for Victoria. Please do not hesitate to contact the undersigned if you would like to further discuss WMRR's submission.

Yours sincerely

Gayle Sloan  
**Chief Executive Officer**  
Waste Management and Resource Recovery Association of Australia

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