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**Minister for Environment; Disability Services; Electoral Affairs**  
**Deputy Leader of the Legislative Council**

Your ref: DWERA-000769  
Our ref: 62-13346

Dr Tom Hatton  
Chairman  
Environmental Protection Authority  
Locked Bag 10, Joondalup DC  
JOONDALUP WA 6919

***Environmental Protection Act 1986***  
**SECTION 43**

Dear Dr <sup>Tom</sup> Hatton

I refer to the advice of the Environmental Protection Authority (EPA) dated 15 March 2019 regarding the assessment of the Great Southern Landfill on Lots 4869, 9926, 26934 and 5931 Great Southern Highway, Shire of York (formerly the Allawuna landfill).

Having considered your letter, I have decided to direct the EPA to assess the proposal under section 43(1) of the *Environmental Protection Act 1986* (EP Act). I have outlined my reasons for this decision in the attached Statement of Reasons.

In accordance with section 43(4) of the EP Act, please publish the reasons for the assessment as soon as practicable on the EPA website.

Yours sincerely

Hon Stephen Dawson MLC  
**MINISTER FOR ENVIRONMENT**

Att: Statement of Reasons  
**28 MAR 2019**

# ***Environmental Protection Act 1986***

## **Section 43**

### **STATEMENT OF REASONS**

#### **DIRECT THE EPA TO ASSESS PROPOSAL**

**Proposal:** Great Southern Landfill at Allawuna Farm Lots 4869, 5931, 9926 and 26934 Great Southern Highway, St Ronans

**Proponent:** Alkina Holdings Pty Ltd

#### **Decision**

For the reasons outlined below, the Minister for Environment directs the Environmental Protection Authority (EPA) to assess the proposal pursuant to section 43 of the *Environmental Protection Act 1986* (EP Act).

#### **Reasons for assessment**

The proposal involves the construction and use of a landfill and associated infrastructure for receiving Class II and III waste of 150,000 to 250,000 tonnes per annum (tpa) over a period of 20 years. Due to the size and length of time of the proposal, it would represent a large landfill facility for Western Australia.

The proposal has the potential to have significant impacts in regard to new and emerging issues that are specific to landfills in southern Western Australia. These emerging issues were not fully considered by the EPA when the proposal was originally received on 27 December 2012 and a decision made not to formally assess the proposal under the EP Act and include:

##### *1. Feral Animals*

The EPA found in 2017 that feral animal populations can increase as a result of landfills and have the potential to significantly impact on the survival of native wildlife. This has been outlined in the EPA report on the Class II Landfill, Lot 7778 Diagram 209805, 1189 Wannamal Road South Proposal – inquiry under section 46 of the EP Act to amend Ministerial Statements 796 and 975.

In addition, the former Minister for Environment decided in the appeals report of 13 August 2015, on the proposed Regional Waste Disposal Facility, Lot 23 (3118), Wandering, Narrogin Road, Shire of Cuballing that, where areas of remnant native vegetation exist in proximity to landfills, impacts on native fauna as a result of landfills attracting feral animals are likely to warrant further EPA consideration.

In the case of this landfill, the site is:

- a. in close proximity to areas of remnant native vegetation, which provide a refugia for native fauna populations;
- b. is a large landfill facility; and
- c. would operate for up to 20 years.

Therefore, an assessment of the impacts from changes to feral animal numbers as a result of the landfill and the potential for increased predation of local native fauna, is warranted.

## *2. Hydrogeology and site characterisation*

Landfills have the potential to cause significant groundwater contamination as a result of waste disposal. Groundwater contamination has the potential to impact surrounding environmental values and reduce the beneficial uses of groundwater. As outlined in the Esperance Waste Management facility environmental scoping document of 2018, to determine the long-term potential for groundwater contamination, the EPA has outlined that an assessment of a landfill in southern Western Australia may require:

- a. a rigorous assessment of site selection and hydrogeology through methods, including but not limited to, physical testing of the aquifer and other methods to further characterise groundwater flow;
- b. a detailed hydrogeological risk assessment to determine potential impacts to sensitive receptors;
- c. a risk assessment of the potential impacts of the facility to nearby land uses such as agriculture, aquaculture, tourism;
- d. the development of a contingency action plan, including monitoring, management, trigger and threshold values, and contingency actions; and
- e. the use of a numerical groundwater flow and solute transport to demonstrate the appropriateness and effectiveness of contingency actions.

In the case of this landfill, it would be up to 10 times larger than the Esperance Waste Management facility (20 000 tpa) and has potential to impact surrounding environmental values. Further detailed assessment of the potential for groundwater contamination is warranted, which includes opportunities for public review or participation