



Department of  
Primary Industries and  
Regional Development

Your reference:  
Our reference: LUP 682  
Enquiries: Greg Doncon

Mr ●●●●●●●●  
Environmental Manager  
Alkina Holdings Pty Ltd  
PO Box 419  
Morley BC WA 6943

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17 February 2020

Dear Mr ●●●●●●●●

### **Great Southern Landfill – Alkina Holdings – EPA Stakeholder Engagement**

Thank you for your enquires concerning advice the Department of Primary Industries and Regional Development (DPIRD) (then Department of Agriculture and Food (DAFWA provided to the Department of Water and Environmental Regulation (then Department of Environmental Regulation) (DWER) concerning the proposed Allawuna Landfill in February 2016.

For your reference, attached is a copy of this letter and many of the comments below should be read in context of that letter.

DPIRD's advice was that Class II and Class III landfill sites "may be a source of pests, diseases, weeds pollutants. However, DAFWA has no evidence that the many landfill sites already in operation in rural areas pose an unacceptable biosecurity risk for agriculture."

DPIRD has experience with a Class II landfill site in the Shire Katanning, where the waste was not fully contained resulting in material blowing onto our research station. In this case, the Shire has taken steps to prevent this reoccurring. Consequently, it would be more correct to state that in Western Australia, to-date none of the agricultural biosecurity incidents have originated from a Class II or Class III landfill site. In this context, DPIRD has no evidence that the operation of landfill in rural areas pose an unacceptable biosecurity risk for agriculture.

The organic certification process is still a function of various certified bodies rather than DPIRD. DPIRD maintain a register of sensitive properties, <https://www.agric.wa.gov.au/grains/sensitive-sites-western-australia> where farmers

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may register their property. However, DPIRD does not actively monitor the organic certification status of farms in Western Australia and would not be able to verify the location of all certified farms in proximity to your proposed facilities.


All commercial aquaculture activities require a licence from DPIRD. Refer <https://www.fish.wa.gov.au/Fishing-and-Aquaculture/Aquaculture/Aquaculture-Management-and-Licensing/Pages/default.aspx>. I can confirm that there are no licenced aquaculture facilities in close proximity to the proposed landfill site.

DPIRD previous position on the importance of identifying biosecurity risks and implementing the all necessary control methods, has not changed, as this is required under the *Biosecurity and Agriculture Management Act 2007*.

The previous proponent proposed that on completion, "the Landfill will be re-habilitated and may be used for agricultural use." DWER lists landfill sites as a potentially contaminating activity. The *Contaminated Sites Act 2003*, defines contaminated, in relation to land, water or a site, as having a substance present in or on that land, water or site at above background concentrations that presents, or has the potential to present, a risk of harm to human health, the environment or any environmental value. The rehabilitated landfill site should not used for agricultural purposes. Revegetation around the landfill site should be maintained and would complement agricultural uses on the adjacent farmland.

I trust these comments inform your decision on the matter. If you have any queries regarding the comments, please contact Greg Doncon at (08) 9081 3117 or [Greg.Doncon@dpird.wa.gov.au](mailto:Greg.Doncon@dpird.wa.gov.au).

Yours sincerely



Melanie Strawbridge  
**Director Agriculture Resource Management and Assessment  
Sustainability and Biosecurity**