



Environmental Protection Authority

Environmental Protection Act 1986

Section 43A

STATEMENT OF REASONS

CONSENT TO CHANGE PROPOSAL DURING ASSESSMENT

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 Environmental Protection Authority (EPA) has determined to consent to the Proponent changing the Proposal outlined in Schedule 1 attached to this Statement of Reasons.

Background

The Great Southern Landfill (formally the Allawuna Landfill) was originally referred to the EPA under section 38 of the *Environmental Protection Act 1986* (EP Act) by a third party on 27 December 2012. The proponent at the time (SITA Australia Pty Ltd) provided the EPA with information on the proposal, describing it as a Class II or Class III landfill, accepting 150,000 to 250,000 tonnes of waste per annum over 37 years, with a lifetime capacity of approximately 12.8 million cubic metres. On 3 July 2013, the EPA Chairman determined the Level of Assessment to be 'Not Assessed – Public Advice'.

Since the determination by the EPA on the original referral in 2013, new information on landfills has become available, particularly in relation to impacts of feral animals on native fauna as a result of landfills and the hydrogeology and impacts to groundwater from landfills in the Southern areas of Western Australia. These issues were not fully considered by the EPA when the original proposal was referred. Consequently, the Minister for Environment directed the EPA to formally assess the proposal on 28 March 2019.

Following instruction from the Minister to assess the proposal the EPA determined to set the Level of Assessment as Public Environmental Review on 29 April 2019, with an EPA-prepared Environmental Scoping Document and a 5 week public review period for the Environmental Review Document.

In advance of the EPA preparing a report on the outcome of its assessment, the Proponent has requested to change the Proposal under s43A of the Act.

Relevant Statutory and Administrative Provisions

Section 3.8 of the Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual 2016 guides what information the EPA requires from a person wanting to change its proposal during assessment.

In considering the request for consent, the EPA considered the:

- details of the proposed change
- statement of the significance of the change
- rationale for the change.

Materials considered in making this decision

In determining whether to consent to the proponent changing the proposal the EPA has considered the following:

1. Alkina Holdings Application to Amend Proposal under 43A of the Environmental Protection Act 1986 (January 2020)
2. Alkina Holding Addendum to Application to Amend Proposal under 43A of the Environmental Protection Act 1986 (February 2020)
3. Endorsed Environmental Scoping Document (September 2019)
4. Clearing Permit Decision Report CPS 6618/1 (April 2016)

Consideration

1. Nature of the proposed change

Alkina Holdings Pty Ltd have sought to remove lots 5931, 9926 and 26934 from the proposal. The original development envelope referred by the Minister for Environment included lots 4869, 5931, 9926 and 26934 Great Southern Highway St Ronans, which represented the entire Allawuna Farm. Alkina Holdings Pty Ltd have refined the development envelope to the lots where development is proposed, namely Lot 4869 on Allawuna Farm and the addition of Part of Lot 29259 on Plan 21496 and Road Reserve 11408616 Great Southern Highway.

The area within Lot 29259 and Road Reserve 11408616 has been included to incorporate the proposed upgrade to Great Southern Highway, allowing for the construction of slip lanes to allow safe entry and exit from the landfill site.

Accordingly, Alkina Holdings Pty Ltd have changed the title of the proposal to reflect the actual development envelope and to simplify the proposal name. The new proposal name is to be *Great Southern Landfill at Allawuna Farm, Great Southern Highway, St. Ronans*. All coordinates defining the Development Envelope and Disturbance Footprint detailed in Figure 1 are held by the Department of Water and Environmental Regulation (Document Reference Number: DWERDT241111).

With the removal of lots 5931, 9926 and 26934 from the proposal, the development envelope has decreased from approximately 1,511.31 hectares (ha) to approximately 136.83 ha (a reduction of 1374.48 ha), which is predominately cleared agricultural land. Clearing of native vegetation has decreased from

approximately 50 ha to approximately 6 ha, this is due to conservative estimates being undertaken for the original proposal based on area and not presence of vegetation. Following refinement of information based on vegetation mapping it has been determined that clearing will involve the clearing of approximately 6 ha equivalent bushland; which are principally isolated and scattered paddock trees. The Disturbance Footprint has increased from approximately 76.43 ha to 84.04 ha (an increase of 7.61 ha) to allow for the addition of the slip lanes on Great Southern Highway and a minor change to the alignment of infrastructure to avoid clearing of native vegetation at the landfill site.

In making the determination of significance of the additional impact, the EPA reviewed the decision report for clearing permit CPS 6618/1, originally issued on 18 April 2016 and subsequently voluntarily withdrawn by SITA Australia Pty Ltd, for the clearing of native vegetation within Lot 29259 on Plan 21496 Great Southern Highway, for the purpose of intersection upgrades to access the landfill site. The decision report detailed the vegetation type and condition along the section of Great Southern Highway where Alkina Holdings Pty Ltd propose to construct slip lanes.

The EPA noted that the clearing application was assessed by the then DER against the clearing principles, planning instruments and other matters in accordance with section 51O of the *Environmental Protection Act 1986*. The assessment included a site inspection of the area along Great Southern Highway, which noted that the vegetation condition under application ranged from completely degraded to very good condition, with approximately 50% in a degraded condition. No priority or threatened ecological communities were mapped within the local area and there was no evidence of any rare flora species.

The proposed additional clearing was identified as potential foraging and breeding habitat for three significant fauna species, Carnaby's cockatoo (*Calyptorhynchus latirostris*), Baudin's cockatoo (*Calyptorhynchus baudinii*) and Forest Red-tailed black cockatoo (*Calyptorhynchus banksia subsp. naso*). The site inspection determined that there were no hollows in trees that were large enough for potential breeding and there was no evidence of cockatoo roosting. The decision report determined that the vegetation along Great Southern Highway was not likely to represent significant foraging habitat given the small size of the application area compared with the large areas of remnant vegetation adjacent to the proposed clearing area. The decision report concluded that the clearing was not likely to cause significant land degradation, increase flooding potential or significantly impact on water quality.

On 5 December 2019, the EPA and representatives from DWER attended the proposed Great Southern Landfill site to verify the significance of the proposed changes.

The EPA considers the environmental impacts from the proposed changes are not expected to differ significantly from the original proposal referred by the Minister for Environment.

2. Stage of the assessment process

On 29 August 2019 the EPA endorsed the Environmental Scoping Document (ESD) specifying the scope and content of the Environmental Review Document (ERD). The ERD is to be updated to include the new development envelope and disturbance footprint.

3. Currency, relevance and reliability of the information, including submissions

The changes proposed include an upgrade to Great Southern Highway, which provides for slip lanes at the intersection of the site access road for safety purposes. The information provided in the decision report for clearing permit CPS 6618/1 is considered to be reliable and relevant and sufficient to inform the decision to change the proposal.

4. Community engagement

The change to the proposal does not significantly increase or alter the impacts to those identified in the original proposal. Community concerns regarding the proposal would be addressed through the ERD public comment period. The proposal would be subject to a 5 week public review period once a suitable ERD has been submitted. Submissions received would be required to be addressed by the proponent in the response to submissions.

5. Level of public concern

Ninety two submissions were received during the seven-day public comment period on the referral, of these ninety one respondents recommended a Public Environmental Review.

The EPA does not consider there to be an increased level of public interest in the proposal from the change.

Consideration of Whether the Change is Unlikely to Significantly Increase Any Impact that the Proposal May Have on the Environment

The following were considered:

a) Values, sensitivity and the quality of the environment which is likely to be impacted

The change to the proposal does not introduce new environmental factors or different impacts to the environment in addition to those identified in the original proposal referred by the Minister for Environment.

b) Extent (intensity, duration, magnitude and geographic footprint) of the likely impacts

The change to the proposal does not include an increase in duration and only a minor increase in the disturbance footprint area (approximately 7.6ha), a decrease in native vegetation clearing (approximately 44 ha) and a decrease in

the Development Envelope (approximately 1374.48 ha), which will not significantly alter the identified impacts.

c) Consequence of the likely impacts (or change)

The change to the proposal does not significantly alter the impacts associated with the proposal.

d) Resilience of the environment to cope with the impacts or change

The resilience of the environment to cope with the change remains unchanged from that of the original proposal.

e) Cumulative impacts with other projects

The change to the proposal does not significantly alter the impacts associated with the proposal, and hence there would be no additional cumulative impacts with other projects.

f) Connections and interactions between parts of the environment to inform holistic view of impacts of the whole environment

The change to the proposal does not alter any connections or interactions with the receiving environment.

g) Level of confidence in the prediction of impacts and the success of proposed mitigation

The change to the proposal does not alter the level of confidence in the predicted impacts and the success of the proposed mitigation.

h) Public interest about the likely effect of the proposal, if implemented, on the environment, and public information that informs the EPA's assessment

There is a moderate to high level of public interest in this proposal. The ERD public comment process will allow for a thorough assessment of the impacts and for public involvement.

**Schedule 1
Change to Proposal**

| Proposal title | Great Southern Landfill at Allawuna Farm, Great Southern Highway, St Ronans | | |
|----------------------------|---|----------------------|-----------------|
| Element | Referral/ESD (ha) | Proposed Change (ha) | Difference (ha) |
| Development Envelope | 1,511.31 | 136.83 | -1,374.48 |
| Disturbance Footprint | 76.43 | 84.04 | +7.61 |
| Native Vegetation Clearing | 50 | 6 | -44 |



Figure 1: Great Southern Landfill at Allawuna Farm Development Envelope and Indicative Footprint

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