

Submission to the Environment Protection Authority on the Verde Terra Pty Ltd application to have EPL 11395 varied.

I have worked in all three levels of government and the private sector in waste management, regulation of liquid and hazardous waste and national recycling for over 20 years. I'm a past President of the Waste Management Association of Australia and was Australia's delegate to the International Solid Waste Association World Congress for 4 years. I believe therefore that I'm in a respected position to comment on the matter of reissuing of EPL 11395 to Verde Terra Pty Ltd. I'm a resident of the Central Coast but believe the issues related to the siting, operation and management of the Mangrove Mountain landfill site have far wider impact than just the Central Coast.

I strongly **oppose** the reissuing of EPL 11395 to Verde Terra Pty Ltd because I believe that Verde Terra must be required to submit a new DA and Environmental Assessment, not only for assessment by Central Coast Council, but also to be subject to public exhibition and comment.

The NSW Environment Protection Authority (EPA) and Central Coast Council, both regulatory authorities, are united in opposing the renewal of the licence. I believe due process has not been followed for many years in regulatory and enforcement matters related to the site. That being said it's time to look to the future, lift the management practices of the existing facility, repair any damage created, mitigate the environmental harm and protect the water catchment area from further assault.

EPA Guidelines for Solid Waste Landfills would today prohibit the siting of this landfill at the head of a water catchment. Indeed National and International guidelines are in agreement.

Stormwater and leachate management at the landfill appears poorly managed, with potential for contamination of ground and surface water, and potable water off-site. It appears that a significant portion of the landfill is unlined. Basic landfill design requires lining of cells to enable leachate and methane gas capture: thus protecting the surrounds from contamination.

I understand the landfill presently holds 800,000 tonnes of waste, 10x that permitted by the 1998 development consent (DC). Without considering the DC or environmental safety, in 2014 the Land and Environment Court (LEC) approved a further 1.3 million tonnes of waste to be imported into four new cells (W, X, Y and Z) in Area B. Central Coast Council requires a new Environmental Impact Statement and Development Application for this major change. Verde Terra Pty Ltd has not submitted either.

An independent consultant appointed by the EPA with input from Mountain Districts Association, Alan Dyer, produced a report entitled 'Technical, Environmental and Operational Review of Mangrove Mountain Landfill' in May 2017, with 61 suggestions for improvement. This report has been omitted by Verde Terra Pty Ltd in its supporting documents.

I reiterate my strong opposition to any further activities on this site without in depth consideration of the consequences and a full adherence to due process for all regulatory requirements.

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The views expressed in this submission are those of the writer and not necessarily those of the Waste Management Association of Australia.