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COMMUNITY AND STAKEHOLDER ENGAGEMENT FINDINGS SUMMARY

Proposal to treat and reuse soil
from the West Gate Tunnel Project

HI-QUALITY GROUP

1 JULY 2020

PURPOSE

This document is a summary of Hi-Quality's Community and Stakeholder Engagement Findings Report that was provided to the Minister for Planning's office in July 2020. It provides a summary of the engagement program undertaken by i.e. community on behalf of Hi-Quality Group on the proposal to treat and reuse spoil from the West Gate Tunnel Project (the Project) at the Sunbury Waste Management Facility located at 570-650 Sunbury Road Bulla.

To read Hi-Quality's responses to the key community concerns, please see the *Closing the Loop: Community Feedback*.

OVERVIEW

This phase of engagement was undertaken from March 2020 to May 2020. We received contributions via an online survey, questions posted to the online engagement hub and conversations via the project phone line and email. We also held detailed briefings and had ongoing conversations with community organisations, property developers and regulatory authorities to provide information, capture concerns and answer questions. The engagement was supported by a communication campaign, including a letterbox drop, newspaper and online advertising, and outreach to community groups.

The purpose of the engagement was to understand and respond to community and stakeholder views on the proposal. This information was then summarised and provided to the Minister for Planning's office for their reference as they review the proposal.

The process was adapted in response to COVID-19 social distancing requirements and stakeholder needs. Activities that would have been held face-to-face under normal circumstances were conducted online, over the phone, or via video conference.

As well as providing insights into community views on the proposal, the engagement found significant concern and confusion in the community surrounding the West Gate Tunnel Project and the Hi-Quality proposal. Much of this is being driven by misinformation in the public sphere. It is also the result of conflicting narratives about potential impacts of the proposal from advocates, including the West Gate Tunnel Project and Transurban, and from those who oppose the proposal. Many people we spoke to don't know who to believe.

There are significant concerns about potential impacts on the local community and environment, largely relating to fears of PFAS contamination. More broadly, opposition to the proposal is driven by confusion between Hi-Quality and the nearby Bulla Tip and Quarry, along with concerns about rapid development in the region and the loss of rural character.

While concerns were raised about the extent of the engagement on the proposal, many people we spoke to appreciated the opportunity to speak to the team in detail about the proposal and have their questions answered, often leading to ongoing dialogue. While not necessarily supporting the proposal, we found that once people understood what Hi-Quality is proposing, they were generally less concerned about potential impacts to the community.

Engagement has been ongoing since May 2020, and the Q&A section of the online engagement hub site and project phone line remain open. We encourage anyone with questions about the proposal to reach out at any time.

ENGAGEMENT PROCESS

HOW WE ENGAGED

Stakeholder engagement



When: 26 March - 22 May (2020)

Who: Stakeholders including adjacent landowners and businesses, developers, community groups, local government, regulatory and statutory authorities.

How: Phone conversations, emails, briefings and submissions

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INTERACTIONS

Online calls and briefings were held with stakeholder groups including adjacent landowners and businesses, developers, community groups, local government, regulatory and statutory authorities. These briefings were an opportunity to engage in an in-depth conversation about the proposal, understand concerns and address any questions.

Online engagement



When: 29 April - 22 May (2020)

Who: Residents, property owners and all interested parties

How: Online survey and Q&A

165
CONTRIBUTIONS

We set up an online engagement hub to let all residents, property and business owners in the local area have their say via a survey or Q&A. The hub is still open and we want anyone with thoughts about the proposal to be able to provide feedback and have their questions answered.

Project phone line



When: 29 April - 22 May (2020)

Who: Local residents

How: Phone conversations

8
CONVERSATIONS

a phone line was established to provide another way for the community to share feedback and discuss the proposal. Interested parties could call the phone line, leave a message with their details, and receive a call back within three business days. The phone line remains open.

PROMOTING THE ENGAGEMENT

To raise awareness and encourage participation, the following activity was undertaken:

Newspaper advertising



Ads promoting the engagement were in the Sunbury & Macedon Ranges Star Weekly over two issues and online.

Project postcard and letterbox drop



Approximately 2,000 postcards were delivered to properties in a 2.5km radius of the Eco-Hub, as well as to residences in parts of Sunbury and Bulla closest to Hi-Quality.

Direct outreach



All the stakeholders and groups we had briefings with were encouraged to promote the project through their networks.

ENGAGEMENT MATERIALS AND RESOURCES

The Hi-Quality team aims to provide the community and stakeholders with detailed, up to date information about the proposal. To support this, the following materials and resources were produced:

Online engagement hub



An interactive site was developed to be the main hub for online engagement. It contains the online survey, Q&A tool, information about the proposal and an option to sign up to receive updates.

Proposal website



Providing information about the project, including frequently asked questions (FAQs), fact sheet, infographic and directions to the online engagement hub.

Briefing presentation



A comprehensive presentation about the proposal used in briefings with all interested stakeholders.

Factsheet and detailed FAQs



Providing an overview of the proposal, responses to anticipated questions and concerns, and contact details for the online engagement hub and phone line.

KEY FINDINGS

The engagement identified a range of concerns about the proposal, largely driven by fears around potential impacts of PFAS contamination on the local community and environment. It also identified issues relating to the operation of a major waste treatment facility in a growing urban area.

Based on the feedback provided by Hi-Quality through the engagement process, the majority of issues raised have been taken into account in the design of the proposal. Community members and stakeholders with an existing relationship with Hi-Quality have a more favourable view of the proposal than those who are unfamiliar with the company and the Sunbury operation. This reflects Hi-Quality's strong reputation and commitment to building local relationships.

As expected, we saw the level of concern grow through the engagement period as people became more aware of the proposal, particularly through media coverage and discussion on social media. However, the level of concern in the Sunbury and Bulla communities has not reached the levels seen in relation to the proposal for Bacchus Marsh.

Across all activities, a number of key themes emerged as outlined below.



Community impact

Concerns around the impact of the proposal on people's health and quality of life in the area. These concerns largely relate to fears around PFAS, along with the impacts of construction and operation of a major new industrial site in the area. There are concerns that the proposal will negatively impact property values and generally impact the highly valued rural character of Sunbury and Bulla.



Roads and transport

The local road network is considered congested and unsafe, and there are significant concerns that additional traffic generated by the proposal will make things worse. Concerns include the proposed route, increase in truck movements, safe transport of contaminated soil and the safety and cleanliness of local roads more generally. Sunbury Road and Bulla Bridge are of particular concern.



Environmental impact

Potential impacts on the natural environment, particularly concerns about PFAS contamination of groundwater and waterways, are of major concern. Stakeholders and the community are seeking reassurance, from independent sources, that the local environment will not be put at risk by the proposal.



Handling of PFAS

The details of how PFAS would be transported, treated, stored and disposed of are of major interest to the community. Given concerns raised in the media and on social media, many in the community are doubtful that PFAS can be handled safely and would prefer the contaminated material was treated elsewhere.



Future development

Many of the people we engaged struggled to understand how a proposal of this nature could be considered given the increase in residential development in the area. An understanding that Hi-Quality has been safely treating contaminated materials at the site for more than 10 years went some way to addressing these concerns. Local property owners, particularly residential developers, are concerned about the impact on property values and their ability to sell their land.



Transparency and engagement

The need for transparency and the engagement process are also common concerns raised, particularly via online channels. There is a clear view that more needs to be done by all parties, including the State Government and the West Gate Tunnel Project, to inform the community about the proposal, provide independent evidence and respond to community concerns.

In addition to specific concerns about the proposal, a number of key factors driving the response to the proposal were identified.



Confusion with Bulla Tip & Quarry (BTQ)

The confusion between the two sites, both being waste management facilities on Sunbury Road, is a major factor driving concern around the Hi-Quality proposal. Many in the community believe that Bulla Tip & Quarry, rather than Hi-Quality, is behind the proposal to accept contaminated waste and are concerned a facility with such a checkered environmental record could even be considered.



Community concerns from other sites

The level of concern and media coverage related to the Bacchus Marsh proposal is a major factor in influencing the concerns of the Sunbury and Bulla communities. While Hi-Quality was able to address some concerns by explaining the difference in the two proposals, the opposition in Bacchus Marsh is seen as an indicator that there are major risks associated with the proposal.



Not being able to tell between fact and fiction

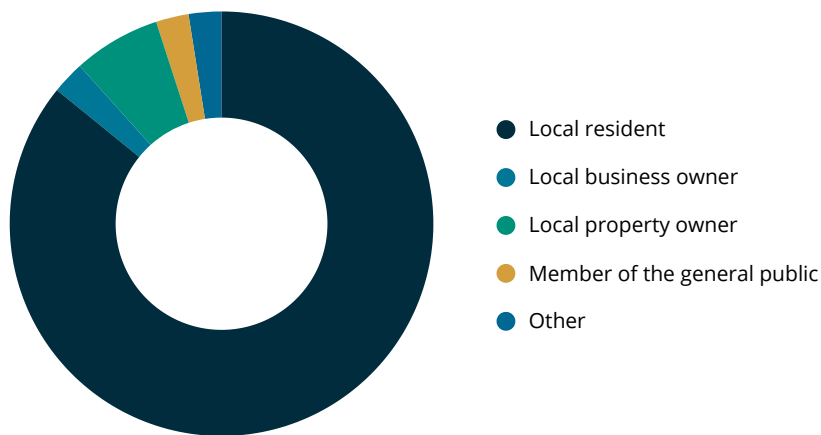
With conflicting messages about the safety of the proposal, people are fearing the worst or are struggling to know what to make of it. There is strong demand for the release of technical reports and the independent verification of the level of PFAS contamination.

WHO WE HEARD FROM

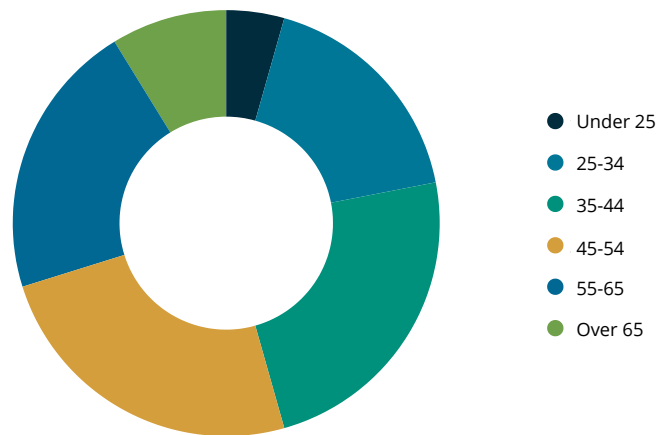
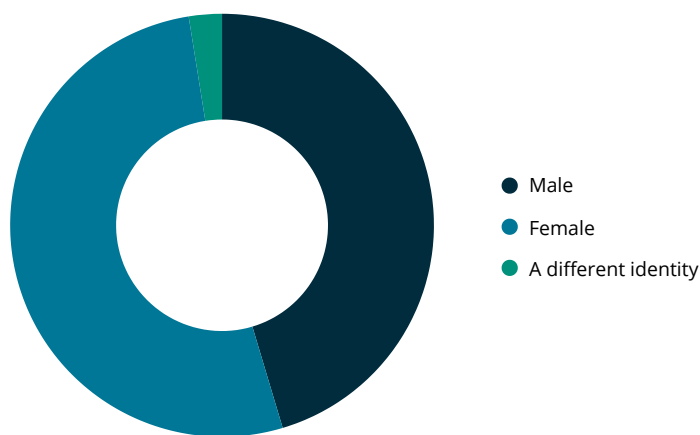
We engaged with stakeholders representing the following groups:

- Community and business groups
- Emergency services
- Local Government
- Local property owners and businesses
- Local residents and property owners
- Property developers
- State Government and statutory authorities
- Traditional Owners.

Engagement with the wider Sunbury and Bulla community was undertaken via an online engagement hub. Most of the people who responded to the survey are local residents, and we also heard from local property owners (7 percent) and business owners (3 percent).



There was also a great balance in the age and gender of people who provided feedback.



QUESTIONS AND ANSWERS

Across all engagement activities similar questions were asked repeatedly. The most frequently asked questions and the answers are provided below.

Why does the soil need to come to Sunbury? Why can't it go to a remote location?

The reason the site is being considered is because it is one of only a small number of locations in Victoria that can safely handle contaminated soil and has been identified by the State Government as a key site for the treatment and disposal of soil for major infrastructure projects, such as the Metro Tunnel and West Gate Tunnel.

Hi-Quality has been operating the Sunbury Eco-Hub as a major quarry, landfill and resource recovery facility since 2003 and has all the required EPA licences. The site's operations include wide buffer zones to ensure minimal impact to neighbouring properties.

How can you be considering bringing it to Sunbury?

The Hi-Quality Sunbury Eco-Hub occupies a large landholding of more than 348 hectares, and the site is largely surrounded by farms and bushland.

It is approximately five kilometres from the Sunbury town centre and more than two kilometres from the nearest existing residential community. Future development will need to comply with the existing 500 metre buffer between the landfill and residences.

What about the proximity to nearby developments?

While there is a lot of development planned for the area, this has been planned with the full knowledge that the Eco-Hub will continue operating on the site for decades to come.

The Eco-Hub site sits within the Sunbury South Precinct Structure Plan, which means it is likely that residential areas will be developed closer to the site over time. However, the site's operations incorporate wide buffer zones to ensure minimal impact to neighbouring land users.

With housing development and urban growth getting closer to the area, what are the potential risks to people moving into those areas in the future?

While there is a lot of development planned for the area, this has been planned with the full knowledge that the Eco-Hub will continue operating on the site for decades to come. The site's operations incorporate wide buffer zones to ensure minimal impact to neighbouring land users.

The long-term plans for the Eco-Hub includes industrial and employment use, and Hi-Quality's owners have land surrounding the site earmarked for residential development in the future. To protect the surrounding community and these long-term plans, Hi-Quality has put forward a robust solution to the treatment of the contaminated soil.

If you're interested to know more about the plans, take a look at the Sunbury South Precinct Structure Plan here: <https://vpa.vic.gov.au/project/sunbury-south>.

How can you consider taking the soil, you already have piles of rubbish and smells contaminating the district?

We think you may be confusing our site with Bulla Tip and Quarry at 500 Sunbury Road, which is a completely separate waste facility with different owners.

The Sunbury Eco-Hub's operations are not visible from Sunbury Road, based down alongside the quarry, and we have been operating without any significant visual or environmental impacts since 2003.

What is the contaminant in the soil?

PFAS, or Per- and poly-fluoroalkyl substances are a group of synthetic chemicals that are resistant to heat, water, and oil. Testing at the West Gate Tunnel site has shown low levels of PFAS contamination in some of the excavated soil which is why it needs to be transported to be tested and safely processed.

We understand community concerns in relation to PFAS, however, based on tests done to date, the levels of PFAS in the material from the tunnel boring machines is extremely low.

I live near the site with my family. Can you offer some kind of guarantee that our health will not be impacted by having PFAS so close to our home?

We understand your concerns. The Victorian Government takes a conservative, safety-focussed approach to managing contaminants such as PFAS. The fact that PFAS has been detected in the soil, even at such low levels, means that it needs to be tested as it comes out of the tunnel to confirm if it is contaminated and, if so, at what levels.

The volume of soil produced by the tunnel boring machines is so great that it needs to be taken elsewhere for testing and to be treated safely. To a large extent, the proposal put forward by Hi-Quality is a holding and testing facility, followed by treatment to remove the PFAS.

The soil coming from the tunnel will be very wet and the PFAS is contained in the water, rather than the soil itself. Our proposed solution involves the safe storage of the wet soil in specially designed containment bays from which the water will be extracted and put through a purpose built water treatment plant to remove all the PFAS.

All studies undertaken to date show that the storage and reuse of the soil will not cause any significant impact or leave any detrimental environmental legacy, either onsite or to the local community.

What happens to the remaining PFAS once the spoil has been treated?

Once the soil has been treated, it will be tested and evaluated against the Hi-Quality Landfill Licence. If the results indicate the remaining material is within our approved levels, the waste will be contained in the EPA Licensed Landfill onsite. The remaining PFAS and any soil that is not able to be contained at the Hi-Quality facility will be transported to a facility approved to handle the material.

Is Hi-Quality already receiving trucks containing contaminated soil? If so, how are you storing the soil as the containment facility has not been built yet?

Hi-Quality has been operating the Sunbury Eco-Hub as a major quarry, landfill and resource recovery facility since 2003. The existing facility includes purpose-built landfill cells to store contaminated waste, including soil with low-levels of PFAS contamination.

In our discussions with community members and stakeholders about the current proposal, we have been open about the fact that we have been accepting contaminated soil from the West Gate Tunnel project for more than 12 months in our existing facility. This soil has come from other works as part of the project, such as road widening, and not from the tunnel boring machines, which is the subject of the current proposal.

The reason the containment bays are required for the soil from the tunnel boring machines, is because the soil will be wet (approximately 40 to 50% moisture content) and needs to be stored, tested and treated before re-use or disposal. As the PFAS is contained in the water, rather than the soil itself, our proposal involves the safe storage of the wet soil in specially designed containment bays from which the water will be extracted and put through a purpose built water treatment plant to remove all the PFAS. These bays will also capture any surface water run-off, preventing it from entering waterways and ensuring it is processed through the water treatment plant.

How are the PFAS materials going to be contained on the site to prevent leaching into the surrounding soil and groundwater?

The protection of waterways and groundwater has been one of the key issues we have considered in designing our proposed solution.

We will use specially constructed soil containment bays to control seepage to the underlying groundwater. These bays are made of high-strength materials with a leach-proof lining to capture any surface run-off, preventing it from entering waterways. The lining system design for the containment bays and all other areas are designed to the highest environmental standards. These bays will also capture any surface water run-off, preventing it from entering waterways and ensuring it is processed through the water treatment plant.

We have undertaken detailed environmental impact reviews which showed storage and reuse will not leave any detrimental environmental legacy, either on site or to the local community. The Hi-Quality Environmental Management Plan also requires regular testing on Emu Creek both upstream and downstream, in accordance with EPA verification and approval, to ensure that no leaching occurs.

How will stop the airborne spread of the soil on windy days?

The soil will have a consistency of sludge when it arrives on the site, with 40-50% moisture content. While the risk of airborne dust is considered extremely low, measures will be taken to control dust at all times.

What will be the increase in truck traffic? How will you manage this increase in truck traffic on local roads?

It's estimated that there will be an average of around 15 trucks per hour travelling to the site during peak periods, around 350 a day. While the facility operates 24 hours a day, the trucks are likely to be less frequent during peak periods to reduce impact on traffic.

To improve safety, traffic lights will be installed at the entrance to the site and the planned speed reduction on Sunbury Road to 80km an hour will be introduced.

What is the proposed truck route?

The trucks will travel along approved arterial roads as assessed and agreed by VicRoads. The primary route is likely to be via the M2 Tullamarine Freeway and C743 Sunbury Road.

There are already too many trucks on Sunbury Road. How will you manage the increase in trucks and ensure safety of commuters?

While the facility to treat the West Gate Tunnel soil is operating, there will be an increase in the number of trucks traveling to and from the site on Sunbury Road. At the entrance to the site new traffic lights will be installed and truck trips distributed to reduce trips at peak periods. This will help minimise any impacts of increased truck movements and improve safety.

We understand that truck movements will be monitored by the West Gate Tunnel Project, drivers will be fully trained and GPS technology in the trucks will allow driver behaviour to be monitored to ensure truck routes are adhered to.

How will you ensure that the roads from the facility are clean and not covered with dirt and hazardous materials?

While VicRoads is responsible for maintaining Sunbury Road and the roadside, we understand how important it is that trucks are as clean as possible when leaving the site. We have put a number of measures in place, including truck cleaning, installing a wheel-wash and sealing 1 kilometre of roads within the site.

All trucks that transport soil from the West Gate Tunnel Project worksites are fully covered so that no dust or soil is dropped along transport routes to the waste management facility. Other safety measures include hosing down the truck and its wheels before it leaves the site and loading the truck in an enclosed shed.

We understand that all relevant EPA Victoria and WorkSafe Victoria requirements will be met during transportation to protect the community and workers from any risk of exposure. More information on the measures the West Gate Tunnel Project is taking to safely transport soil can be found here: <https://westgatetunnelproject.vic.gov.au/construction/soil-management/fact-sheet>

When will a decision be made if the soil will be going to Sunbury?

Hi-Quality will be preparing a draft planning scheme amendment in next month or two. We will then need to wait for the Minister for Planning to make a decision and for the West Gate Tunnel Project contractors to award the tender. We expect a decision in the next couple of months.

Does Hi-Quality have the necessary licences for the project?

Hi-Quality requires EPA approvals for the testing and drainage area, containment bays, water treatment plant and disposal of Non-Prescribed Industrial Waste.

We will use our existing Landfill and Prescribed Industrial Waste Licence for the project. Once the waste has been treated, if the levels of contamination are allowable within Hi-Quality's current licence, then it will remain onsite and no additional licences or permits will be required.

Based on tests done to date, the levels of PFAS in the material are extremely low and fall within our current EPA Victoria licence. We have been safely managing contaminated waste under this licence since 2003.

How can the public support this proposal if basic environmental measures, which are detailed in the Environment Management Plan (EMP) and technical studies remain secret?

It's a fair question, we understand there are concerns about potential impacts to the environment and why you are seeking reassurance that our proposal is sound. The reality of the situation is that we are in the middle of a tender process and our proposal and supporting technical reports are not public documents at this stage.

If you would like to know more about the anticipated levels of PFAS for the project, please visit the West Gate Tunnel Project's website using the link below, where you can find more information about the projected levels of PFAS compared to national health and safety guidelines and an explanation from Dr Jackie Wright from environmental assessment services provider, EnRisks.

<https://westgatetunnelproject.vic.gov.au/construction/soil-management/expected-pfas-levels>.

While we understand that we haven't fully answered your question, we hope it goes some way to addressing your concerns.