

<b>Board Meeting:</b> March 2019	<b>Agenda Number:</b> 12(vii)	<b>Record:</b> ED19/2023
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# **LORD HOWE ISLAND BOARD**

## **Business Paper**

### **OPEN SESSION**

#### **ITEM**

Waste Management Facility – EPA Licence

#### **RECOMMENDATION**

That the Board note this report

#### **BACKGROUND**

Lord Howe Island Board (LHIB) operate at the Waste Management Facility (WMF) through an Environmental Protection Licence No 10466 which is issued under the Protection of the Environment Operations Act 1997. This licence authorises the carrying out of waste management activities at the LHIB WMF. The licence includes numerous conditions that aim at preventing or minimising the environmental impacts from the activities carried out at the WMF.

#### **BREACH OF CONDITIONS OF LICENCE**

On 30 October 2018 the Environment Protection Authority (EPA) conducted a routine inspection of the WMF and during the inspection observed a number of issues with respect to our licence conditions which raised concerns. On 3 December 2018 a letter from the EPA was received outlining these issues and inviting LHIB to respond as to why the EPA should not take any regulatory action.

On 10 December 2018 a response was sent back to the EPA providing information as to the extenuating circumstances surrounding the observations. It also outlined the works currently being undertaken and the change in processes being implemented to improve the way the WMF operates, a copy of this letter has been attached to this report.

Over the last two years the Rodent Eradication Program (REP) has seen a significant increase in waste activity at the WMF through two main areas.

Firstly the removal of hard waste from properties to the WMF in the “Island Clean-up” project where over 500 tonnes of hard waste that had been stored/hoarded in private property and scattered around the island was collected and accepted at the facility in August 2017.

Secondly, it was thought by many that the planned baiting period (winter 2018) would impact on the tourist numbers wanting to come to the island. This resulted in a large number of lodges submitting development applications to renovate/renew a significant number of their buildings.

In fact over the past 12 months 22 construction certificates have been issued to add to the 32 active ones. Considering there are less than 200 dwellings on the island this is a very large percentage. This has seen a disproportionate amount of building waste from both building demolition and new building waste materials come into the facility in the past 8 months.

This construction and clean-up waste is sorted on-site into builders waste (landfill), recyclable plastic, steel and aluminium. It is then added to the normal household general waste that has also been sorted into landfill and recyclables to be sent off the island. The only shipping service to/from the island must have all this waste material delivered to them by the Board in skips weighing a total maximum of 2 tonnes each so that they can move them in their cargo space in the hold and on the deck. The ship does not always have room to bring empty skips to the island and can only provide service to the island on certain tides during the year. On average the Board would only receive 5 skips per voyage of which there are approximately 23 per year. This means we can really only remove approximately 250 tonnes of waste a year. Looking over the past 12 months to date we have only been able to remove 205 tonnes of waste which is why the material stockpiles are much larger than in the past. The Board also try and get as many as possible skips on the ship's eastbound voyages, but this is a constant challenge for the ship owners as they need to supply other customers with goods and cargo.

During recent discussions with the shipping company about these issues (Birdon Pty Ltd), they have agreed to trial the removal of the old recycled plastic waste bales which will be plastic wrapped and secured on pallets but not placed in skips. At the time of writing this report it is not known if this methodology will work or be acceptable for our old bales which have been sitting for a long time and are free of any food waste. However, as the fresh bales will have left over food waste residue remaining in them it would be unlikely that this methodology would be acceptable for our future recycled plastic bales. Also as part of these discussions the Board have requested that a minimum of 10-12 skips be allocated space on each eastbound voyage to ensure we can manage the waste moving forward.

Another constraint is staffing levels, currently there is only one LHIB staff member allocated full time to the WMF with additional staff during service times which is proving to be insufficient with the daily mandatory requirements. This is especially noticeable with the current volume of waste being managed and meeting our licence requirements. Moving forward it is proposed to prepare a business case to increase the staffing at the WMF to two full time positions to assist with the EPA licencing conditions.

## **RECOMMENDATION**

That the Board note this report

**Prepared:** John Teague, Manager Infrastructure & Engineering Services

**Endorsed:** Peter Adams, Chief Executive Officer

**Attachments:** Attachment A - LHIB Response Letter

Record Number: ED18/11462  
Enquiries: John Teague

10 December 2018

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Dear Ms Bancroft,

### **Breach of Conditions of EPA Licence 10466 – Invitation to Show Cause**

I refer to your letter dated 3 December 2018 regarding our breach of conditions of EPA licence 10466 and thank you for the opportunity to respond.

It is with significant concern that I prepare this response to your letter because the commitment of the Lord Howe Island Board to managing its environment, including managing waste in a World Heritage listed location is a priority. The island has constraints in terms of resources and the practical issues involved in its approach of managing waste to minimise the export of waste by reusing, repurposing and recycling.

The Board has a new Chief Executive who has initiated a review of all EPA licence objectives and requirements associated with the waste management facility. He has communicated that he will be seeking to find means to address these challenges and ensure compliance as well as responsible and cutting edge remote island waste management practices. This review will include staff resource allocation especially during the unprecedented loads and demands experienced by the waste management facility over the last year as well as those expected over the coming year. Some background below explains those demands. Following that some immediate responses to the specific matters in your letter are provided in the interim.

### **Background**

The Lord Howe Island Waste Management Facility (WMF) is a very constrained site located on the mid-western coast line of the island where we manage all the waste generated on the island. Over the last two years the Lord Howe Island Board has been undertaking a Rodent Eradication Program (REP) as rodents are currently having significant impacts on World Heritage values including impacts to a range of listed threatened species. This program has seen a significant increase in waste activity at the WMF through two main areas.

Firstly the removal of hard waste from properties to the WMF in the “Island Clean-up” project where over 500 tonnes of hard waste that had been stored/hoarded in private



WORLD HERITAGE AREA

property and scattered around the island was collected and accepted at the facility in August 2017.

Secondly it was thought by many that the planned baiting period (winter 2018) would impact on tourists wanting to come to the island. This resulted in almost all lodges submitting development applications to renovate/renew a significant number of their buildings. In fact over the past 12 months 22 construction certificates have been issued to add to the 32 active ones. Considering there are less than 200 dwellings on the island this is a very large percentage. This has seen a disproportionate amount of building waste from both building demolition and new building waste materials come into the facility in the past 8 months.

This construction/clean-up waste is then sorted on-site into builders waste (landfill), recyclable plastic, steel and aluminium. It is then added to the normal household general waste that has also been sorted into landfill and recyclables to be sent off the island. The only shipping service to the island must have all this waste material delivered to them by the Board in skips weighing a total maximum of 2 tonnes each so that they can move them in their cargo space in the hold and on the deck. The ship does not always have room to bring empty skips to the island and can only provide service to the island on certain tides during the year. On average we would only get 5 skips per voyage of which there are approximately 23 per year. This means we can really only remove approximately 250 tonnes of waste a year. Looking over the past 12 months to date we have only been able to remove 205 tonnes of waste which is why the material stockpiles are much larger than what we are used to. We also try and get as many skips on the ship's eastern voyages as possible but this is a constant balance for the ship owners as they need to supply other customers with goods and cargo.

I provide the following responses to your specific observations;

C (i) Shredded Paper, Cardboard & Woodchip Stockpile

The Board has constructed new concrete bunkers to contain the shredded paper/cardboard and will relocate the stockpile this month. The old site will then have the new perimeter fence with shade cloth installed and the green woodchip stockpile will be moved into the protected area. Then this old site will again have the perimeter fence with shade cloth installed to stop any future migration beyond the site boundary. The site has been inspected with the Lord Howe Island's Manager Environment and World Heritage (MEWH) to determine the impact of the encroachment into our native vegetation in this area. The MEWH has been a partner with the development of a combined approach to establish the correct location of the perimeter fence, assist in the recovery of the native vegetation and a plan for the western revegetation zone.

C (ii) Wind-blown Litter

The Board acknowledges that wind-blown litter has escaped the WMF site and shares your concerns with the impact of this on the local environment. A number of working parties have been involved in "emu-bob" parades to pick-up and remove this litter and plans are in place to install a perimeter fence with shade cloth to prevent the escape of litter from the site by the end of December 2018. A

large amount of this plastic litter appears to be from soft wrapping of recycled plastic bales that could not be loaded on the ship due to skips not being available.

Works have also commenced along the exposed western coastal boundary to raise the height of the proposed vegetation zone to help reduce the visual impact of the WMF from the beach/ocean. This will also help as a future wind break to reduce the risk of windblown litter in this area. The new compost maturation bunkers had to be installed first before we could start on the revegetation of the site.

C (iii) Mixed-waste Stockpile

The mixed-waste stockpile is where the builders waste from the extensive construction works has been stored ready to be separated into recyclable and landfill materials. The site is very constricted at this point and due to the unusually large quantity has to be occasionally pushed up with machinery to allow access to the rear of the site where other waste material are stored. This action has caused some material to overtop and fall beyond the perimeter fence, which remains in place but will be replaced with new fencing once the stockpile is reduced in size. The material that had fallen behind the fence has been removed.

C (iv) Delineation of Premise Boundary

The Board has constructed four new concrete bunds for both compost and shredded paper/cardboard storage as well as being the first stage of the new perimeter fence along the eastern boundary. The rest of the fencing material has arrived on site and the Board has engaged a contractor to install the eastern fence up to the "reuse" shed apart from behind the mixed-waste stockpile which will be undertaken once the site is accessible.

Should you wish to discuss these matters further please do not hesitate to contact the undersigned on 6563 2066.

Yours faithfully



John Teague  
**MANAGER, INFRASTRUCTURE AND ENGINEERING SERVICES**