

To the Director-General for ACT Planning

Dear Sir,

The CRS proposal for a Materials Recovery Facility results in the transfer of at least 80% of waste received to send 70km further on to landfill at Woodlawn and thus undermines the recommendations of the *Waste Feasibility Study*;

*The recommendations in this report build on the ACT Government's commitment to reducing greenhouse gas emissions by focusing on the reduction of organic material from landfill and will complement the green bin collection service already being rolled-out across the city. Indeed a composting site and food and organic waste collection service could see 40,000 tonnes of waste diverted from landfill.*

We have as Canberra's population significantly increased in the period from 1994-5 to 2015-16 reduced waste to landfill by 30% advised by the most recent report of the Commissioner for Sustainability. Minister Fitzharris said we need to reduce our waste to landfill and better our recycling of waste by a further 20%. So CRS has proposed to achieve this by a materials recovery target of 20% from the red bin and commercial waste currently going to landfill at Mugga. This target is overambitious as a similar Veolia MRF in Leeds UK is after two years operation struggling to reach 2.5% of its only 10% target. In a presentation on 9.11.2017 the CRS representative proclaimed Leeds achieved 24%. The comparison with Leeds does not rate mention in this draft EIS. In fact there is lack of comparison to any operational facility receiving similar waste to achieve such target.

Moreover, the similar waste transfer terminal at Banksmeadow receiving red bin waste for Woodlawn, initially was intended to receive red bin and commercial waste, similar to the proposal for Fyshwick, but only transfers the red bin waste.

CRS must be asked to provide;

1. Proper comparison with a similar facility which is achieving a materials recovery rate of 20%
2. Comparison with an existing facility that is functioning with the two waste streams in the *one location*
3. Evidence that waste to landfill in a location 70km from Canberra will be economical for the ACT

Thank you for the opportunity to comment.

