

NI 2018-27

Application No: 201700053

Submission opposing the MRF at Fyshwick

Personal Objections to EIS-201700053

I object to many aspects of this proposal on health grounds, namely the introduction of many more fine particulates into the surrounding area courtesy of the very high number of truck movements it would involve; on amenity, which the build-up of waste materials in an area so close to key residences and businesses would compromise; and on environmental grounds, as the trucking of waste into and out of such a busy area only to result in a very small percentage of recycling (around 20% is claimed by the proponent) simply makes no environmental sense.

Question 1:

Can the proponents guarantee that the introduction of trucks that are currently fuelled by diesel into the Fyshwick area at a rate of four per minute in peak time, will not further compromise the health of residents who already suffer from pulmonary conditions such as asthma?

The ACT government has attained nation-wide, and perhaps even world-wide, recognition for its leadership in adopting a genuine renewable energy policy and its commitment to reaching zero net emissions by no later than 2045. I therefore object very strongly to the certain tarnishing of this reputation that the proponent of EIS-201700053 risks through this proposal. (See the December 2017 Discussion Paper entitled *ACT's Climate Strategy to a Zero Net Emissions Territory* and the resulting community consultation).

Question 2:

Can the proponents guarantee that the acceptance of this proposal will not damage the reputation of the ACT government as a national leader in environmentally responsible waste management and compromise the economic opportunities which arise from this leadership, to the economic detriment of the wider Canberra community?

Wider objection on the grounds of due process:

There are also some disturbing questions surrounding EIS-201700053, such as the lack of a signature on the original application, the failure to take due diligence in assessing the proponent's financial status and the proponent's alleged own statement of enjoying some kind of political support for the proposal, but by far the most serious is the question of error in the **zoning** of the facility.

The placement of the proposal for Block 11, Section 8, in the merit track of Industrial Zone 2, set aside for general light industrial and retail activities, prohibits “railway use” and “incineration facility”, as well as any “hazardous waste facility”, as not conducive to the mixed use nature implied in the zoning.

Given the proposal’s focus on moving recycled materials via rail, it clearly should have fallen into Industrial Zone 1, the general industrial zone, which sees rail use as a merit track activity. While the placement of “incineration facility” in Industrial Zone 1 is itself open to serious question, given current research on the health dangers of such facilities and a strong move in best practice world cities away from incineration, there is even more reason to reject a proposal that still envisages a possible future incinerator lying dormant within the proposal. It is this possibility that has helped contribute, justifiably, to community suspicion of the remaining recycling facility proposal that we see in EIS-201700053.

Question 3:

*Can the proponents guarantee that they will not pursue the construction of an incinerator on the Fyshwick site at **any date in the future**, irrespective of changes in government or changes in incinerator technology or any other changes that might render a future incinerator an attractive business proposition?*

The CRS proposal is also at odds with Industrial Use 2 zoning which is clear in its vision for active travel integrated with public transport that is linked to the trade and retail activities of the mixed use nature of Fyshwick today. The entry and exit of high numbers of truck movements is not conducive to active travel or high numbers of the public coming and going in this vibrant business area, for clear reasons of pollution and congestion, nor is it conducive to the residential nature of existing and proposed areas in close proximity. See the December 2017 Discussion Paper entitled *ACT’s Climate Strategy to a Zero Net Emissions Territory*, for the ACT government’s focus on active travel and accompanying community health benefits.

Why due process matters:

While there needs to be some flexibility in changes to zoning as technology and public awareness of health risks change, the perception that the rules can be changed to favour certain proponents over others is a dangerous one.

The history of the CRS proposal is now one of twists and turns as the less risky activity of recycling is retained as the major activity, while the much more risky incinerator is side-lined, but only temporarily, in the eyes of the best informed and most vocal community opponents to the project.

When the ACT government saw Waste to Energy as a source of 'renewable' energy and a possible solution to the environmental disaster lurking behind landfill, incineration may have seemed like an ideal solution, but that is no longer the case, now that the dangers of burning waste are better understood and the government is working on a much longer term and thoughtful treatment of waste based on reduced consumption, the elimination of much food waste and the opportunities offered by composting and anaerobic digestion.

Question 4:

Can the proponent justify the receipt of red bin waste which is up to 70% organic waste, well suited to composting and anaerobic digestion and already of interest to other local businesses, given that it, CRS, intends to divert the majority of this waste to landfill at Woodlawn?

However, the lack of transparency behind the whole CRS proposal, the very long wait for the Waste Feasibility Study and the tiny amount of time given for community responses to it, compounded by the feeling in community groups that they have to fight endlessly against silly proposals that go against any common sense of how zoning should work to support the community and the environment, all contribute to a sense of suspicion of government and cynicism towards any government trying to grapple with genuine environmental problems associated with waste, within real budgetary restraints.

The risks to democratic government in general, as well as the political risks to the incumbent government which has worked very hard on long term solutions to environmental issues, are clear in EIS-201700053.

All proponents need to be treated equally in open and transparent processes that stand up to close public scrutiny, so that the hard decisions good governments need to take are not just accepted, but actively supported and enhanced.

