

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, 27 June 2018 2:44 PM  
**To:** EPD, Customer Services  
**Subject:** Submission of objection to EIS201700053  
**Attachments:** eis waste management.docx; ATT00001.htm

**Categories:** Green Category

Sent from my iPhone

[EPDCustomerServices@act.gov.au](mailto:EPDCustomerServices@act.gov.au)

Submission of objection to EIS201700053

Please note this document as my representation objecting to the locating of a major waste facility in Fyshwick.

I have several objections but I submit these two as primary concerns:

**INAPPROPRIATE SITE LOCATION.**

This site is fundamentally unsuited for the purpose. The site has major accessibility issues – the increase in traffic (upwards of 400 truck movements per day!) in that area alone would not be supported by the road infrastructure and would have a profoundly negative impact on the businesses running in that area. It is clear that a traffic survey has not been conducted, nor has adequate consideration been given to the accessibility required for fire hazard reduction, prevention and response – a known hazard for such facilities. The site location is also unsuitable for other significant reasons - not excluding its proximity to parliamentary triangle, current residential areas and proposed development sites, and high-use commercial and retail properties – but also because of the location to Canberra’s wetlands and waterways.

The draft EIS is inadequate and must be reviewed to address its shortcomings

- Lack of information around fire risk and proposed risk treatment options for the waste facility itself and the scrap metal facility to which it adjoins. This should include bushfire.
- It does not meet the separation distance guidelines for nearby residential areas
- The nearby scrap metal facility also does not meet separation distance guidelines for nearby wetlands.
- It does not provide an adequate assessment of the traffic impact, supported by a traffic survey
- It does not include an air quality study
- It does not address alternative options –see points below

**DOES NOT ADDRESS THE PRIMARY PROBLEM (SOLUTION FITNESS FOR PURPOSE)**

The ‘waste transfer station’ solution is an inadequate response to Meegan Fitzharris’ call for innovative proposals to manage ACT’s waste into the future. It does not address waste avoidance, it does not address waste reduction, it does not address waste reuse AND it does not address waste recycling – all of which are the top four preferred methods for dealing with waste in the waste hierarchy referred to by the ACT Waste Feasibility Study. It is significant that the ‘waste management solution’ that is receiving the most focus and gaining the most traction is the one which will be the most costly to the ACT, the health of its residents and its environment – AND potentially delivers the least financial, community or environmental benefits.

The proposed solution does not outline benefits that outweigh those heavy environmental and community costs. And it does not provide a comparison between this option and alternatives that do reuse, recover, recycle or reduce waste more effectively.

It also does not explain why the introduction of a transfer station addresses the issues of waste management. Surely waste sorting can occur at the current Mugga Lane Hume

facility, and transfer could take place directly from that location to Woodlawn. This, coupled with more competent solutions to reduce, reuse, recycle and recover waste would be a more desirable solution than simply adding another link to the chain.