

**From:** [REDACTED]  
**To:** [EPD, Customer Services](#)  
**Subject:** NI 2018-27 Application No: 201700053 Submission opposing the MRF at Fyshwick  
**Date:** Monday, 25 June 2018 2:47:28 PM

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Dear Sir or Madam

I would like to object to the above application on the following basis:

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Topics of objection

- **Health Risks** – The Health Report in the EIS is inadequate and fails to assess the air inversion issue for this inner south area, the hazardous working conditions inside a supposedly sealed shed and the increased diesel fumes concentrated by slow moving heavy vehicles on the single through lanes of Ipswich St.
- **Odour** - The most obvious impact for locals living close to the proposal is smell, all the red bin waste and commercial bin waste from Canberra and surrounds will be processed in the shed to be built with the fumes drawn up via 6 storey high chimneys and pumped into the air to swirl around our area.
- **Traffic** - All garbage trucks along with much larger articulated and B Double vehicles will need to access and leave the site each day. This equates to 460 extra garbage truck movements on Ipswich St alone. This is already a congested traffic area and these numbers will bring Fyshwick traffic around the site close to a standstill when it is operating. The EIS has not accounted for the lunch time peak for traffic in the area nor can modelling be done on an average truck movement in and out of the site but is required to address a worst case scenario. The trucks will travel mainly between 7am and 4pm so the average is more likely to be one every 2 not 4 minutes. Obviously queueing will occur as happens at Mugga now.
- **Noise** – Those that live in Old Narrabundah are already aware of the noise from heavy vehicles each night when background noise is minimal, add to this another industry with longer than usual processing operational hours and increased truck movements as proposed just to interrupt your peace and quiet for longer each day. Residents closest to this site will also have to battle with the noise from heavy machinery processing the waste late into the evening and early in the morning. There are residents living within 100m on Wiluna St.
- **Fire Risk** – The proponents do not have the best record for

alleviating fire risk in their metal yard. The ACT Fire Service has been called seven times to the proponent's current operation in Lithgow St Fyshwick over the last four years. What comes from fire is toxic fumes that effect on site workers, all those close by and those in the direction of the wind. Businesses in the area would be closed down and people could be ordered to leave their homes while the fire is brought under control. Fires in waste transfer stations can burn for days.

- **Life of our Existing Mugga Lane Facility** – There is no issue of poor waste management in the ACT. We have environmental targets second to none. The Mugga Lane landfill operation has legislation which supports some 30 years of operation from 2015. The environmental offsets were all in place ahead of time. The Mugga bioreactor collecting methane to produce electricity is more efficient than at Woodlawn (Tarago) where CRS say the waste will go. We own Mugga. We have the most advanced glass treatment in our recycling Facility at Hume. The Waste Feasibility Study, an important government investigation over more than 2 years has a major recommendation for food and garden organics to go into our new green bins to be composted. This proposal is to rail more than 80% of the waste delivered to Fyshwick into landfill 70 km away. We have reduced waste to landfill by 30% in the time that the ACT population has more than doubled so we don't need to give CRS a monopoly on our waste management or to locate any waste facility at Fyshwick. Minister Fitzharris's call to industry in February 2017 sites the Hume Waste Precinct and the area across the Monaro Highway at Hume as a centre of excellence for waste management in Australia.
- **Recycle** – The claim is to achieve a further 20% of recycle product from our bins however world figures from like facilities only show figures of between 2% and 10%. Our existing Mugga facility is already achieving these figures so the Fyshwick site would not boost the community's expectation of a better recycling model.
- **Devaluing our Assets** – Our land is our major asset in ACT and it could be argued that the land opposite this site known as East Lake could suffer heavy losses in price expectation if this proposal went ahead. East Lake is at the notification stage and will in the future house 9000 people living in buildings up to 6 storeys high. These price devaluations will impact on property owners in Fyshwick, Symonston, Narrabundah and the Kingston Foreshore. The ACT government owns a 5.8h site in Lithgow St and Canberra Ave.

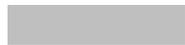
Future development proposals will similarly be devalued with proximity to a red bin waste facility.

- **Are we the Capital of Australia?** – Why would we jeopardise opportunities to sell our city to the world in the best possible way. This site is within 4.2km from most National buildings and the Parliamentary triangle. Why risk smell, fire or even a toxic bloom close to these National treasures and tourism attractions.
- **What of the impacts to business in the same street** – The EIS offers little in consideration to the future of the existing businesses in this area. Shoppers will stay away and the viability of the businesses will be at risk, tenants will want out of their leases and landlords will be left with poor prospects for attracting new business into their premises. CRS has done no assessment of the property devaluations as promised at its presentations to community.
- **Our Wetlands** – Little to no risk is the statement in the EIS. However this Shell site is seriously contaminated with hydrocarbons which have possibly leached into the groundwater and soil and may have migrated off site. This risk has been too easily dismissed in the EIS and the proposal offers no protection to Jerrabomberra Creek but rather exposes it to further ecological harm. No proper hydrological assessment is contained in the EIS.
- **Could we be stuck with a lemon** – There is no evidence that the NSW Government, through their Woodlawn facility, will take all the unrecyclable waste from the ACT through this site. Why would the NSW Government legislate for Woodlawn to take some 240,000tpa from the ACT which will shorten the life of its major landfill site accepting around 20% of Sydney's red bin waste? There is also no evidence to support the claim that the ACT Government will allow contracts to CRS on any kerbside waste. Only commercial will be available.
- **ACT Waste Feasibility Study** – This paper recommends diversion of organics from landfill, however, this proposal for Fyshwick diverts organic waste from Mugga landfill to another at Woodlawn about 70km away. We can do better as a city because we have the space at Mugga to improve our organic recycling and help achieve community expectations, along with government targets, in the future on recycling. In the ACT Waste Strategy 2011-2025 *The ACT Government has adopted the policy that the ACT must continue to manage its own waste (i.e. not send it away for disposal). As such*

*consideration has been given to the selection of areas within the ACT suitable for landfill into the future.* This strategy policy feeds into the Waste Feasibility Study recently released. HAVE YOUR SAY now until to 2 July.

- **Waste to Energy** –The proposal for the Fyshwick site does not include the burning of waste however the option of a future incinerator is still part of the ACTPLA scoping document and can be put forward as stage 2, even though the proponents deny this is their intention. The CRS Application to Government in this EIS process clearly advises stage 1 to be the MRF and stage 2 to be the waste to energy incinerator as “ancillary” which is developers speak in order to receive clear passage from government.

Yours faithfully,

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