Appendix N:

Community and Stakeholder Engagement Report

NewGate

NEWGATE ENGAGE

ENVIRONMENTAL IMPACT STATEMENT

FYSHWICK RECYCLING AND RAIL FREIGHT PROPOSAL

Community and stakeholder Engagement Report

November 2017

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FIGURES

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EXECUTIVE SUMMARY

In June 2017 Capital Recycling Solutions (CRS) and ActewAGL Retail announced a proposal for an advanced recycling, resource recovery and renewable energy centre. The community and stakeholders were actively engaged for this proposal during July, August and September 2017.

Capital Recycling Solutions (CRS) and ActewAGL Retail announced on 16 October 2017 they had separated the project into two distinct Environmental Impact Statements (EIS) and development applications:

- the first being for the recycling and rail freight terminal components of the project, called a Materials Recovery Facility (MRF); and
- the second for the renewable energy component of the project, which is planned to be provided in a draft EIS in 2018.

This report describes the consultation process and consultation activities undertaken for the proposed Fyshwick recycling and freight rail facilities. The reasoning for this was to allow the recycling activity to be considered by Government, and if approved, implemented, whilst the renewable energy component is studied further by plant specialists, the community and local stakeholders.

Background

The ACT has one of the highest per capita waste generation rates in Australia and with a growing population needs effective solutions.

In 2014 The Hon Simon Corbell MLA, the Minister for the Environment and Sustainable Development, announced a waste management policy for the ACT that allows for up to 23 Mega-watt electricity of feed-in-tariff entitlements, to encourage the establishment of an advanced thermal processing facility in the ACT by 2020. The intent of this policy and subsequent community discussion was to encourage the deployment of proven and reliable technologies to vastly improve resource recovery rates from waste in the Canberra region, as well as meet the ACT's renewable energy targets whilst minimising landfill to less than 10%.

CRS and ActewAGL Retail have developed this proposal to address an underdeveloped recycling market and the opportunity to employ advanced technologies to solve both ACT's waste problem and contribute valuable renewable energy to the local electricity network.

Two ACT government strategies were developed to establish waste management targets including waste processing and recycling. The strategies were as follows:

1. *ACT Waste Management Strategy 2011 – 2025*

The goal of the ACT Waste Management Strategy 2011–2025 is to ensure that the ACT leads innovation to achieve full resource recovery and a carbon neutral waste sector. This goal is supported by four key objectives:

- less waste generated;
- full resource recovery;
- a clean environment; and
- a carbon neutral waste sector.

The strategies suggested within this policy to enable a carbon neutral waste sector include: reducing landfill; using energy-from-waste technology; increasing recycling to avoid greenhouse gas emissions; and using energy efficient waste collection and transport solutions.

2. *Canberra 100% Renewable Energy by 2020*. In April 2016, the ACT Government announced a target of sourcing 100% renewable electricity by 2020 from within the ACT or across the National Electricity Market.

As a result of these Government strategies, CRS and ActewAGL Retail are proposing a solution that creates Australia's most advanced waste, recovery recycling and renewable energy centre.

The Proposal

The materials recovery facility is proposed to accept up to 300,000 tons of waste per annum. In this way CRS will provide a regional waste solution to meet the requirements of the ACT Government. The centre would aim to recycle more than 20% of this waste, or around 60,000 tonnes per annum. The balance of the waste would then travel by rail to the Woodlawn Bioreactor Waste facility. This would reduce the amount of waste going into Mugga Lane landfill by around 300,000 tonnes per year.

To support the materials recovery facility CRS proposes to establish a commercial scale intermodal rail freight terminal and provide a regular, competitively priced, railway freight service access. The proposal is to utilise the established railway line next to the site to import waste and export recycled materials using the 2,800-m long siding called the 'south shunt' located on the property boundary. This would also allow businesses to move containerised goods in and out of Canberra, with economic and environmental benefits.

Community and Stakeholder Engagement

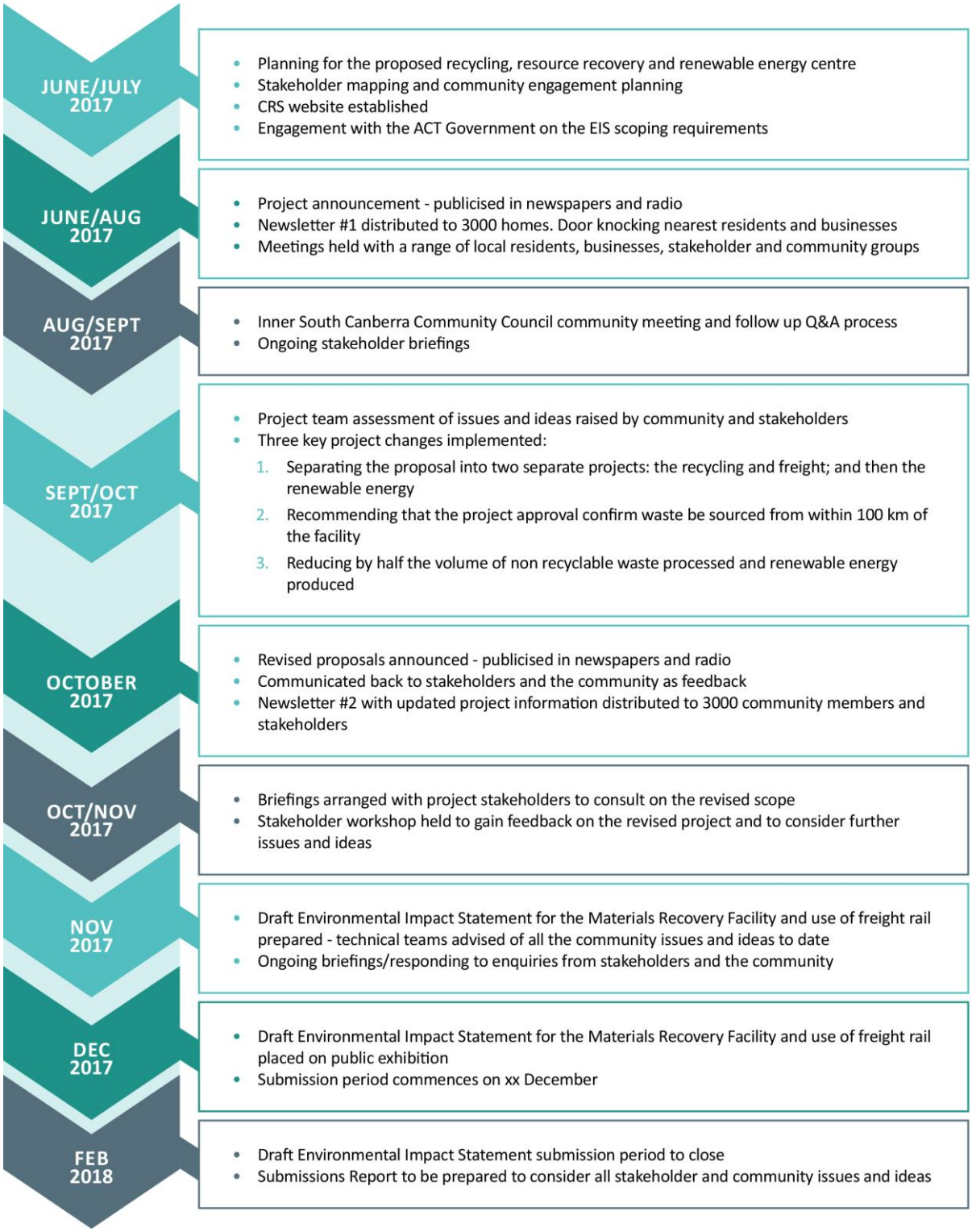
During the community and stakeholder engagement planning for the new waste management initiative CRS and ActewAGL Retail engaged with the community and stakeholders. Community consultation commenced in July 2017 and continued until December 2017.

The approach to community and stakeholder engagement included:

- Providing information to residents, businesses, stakeholder and community groups;
- Two-way interaction on a range of issues relating to the project; and
- Receiving community and stakeholder feedback for consideration as part of the environmental impact assessment studies.

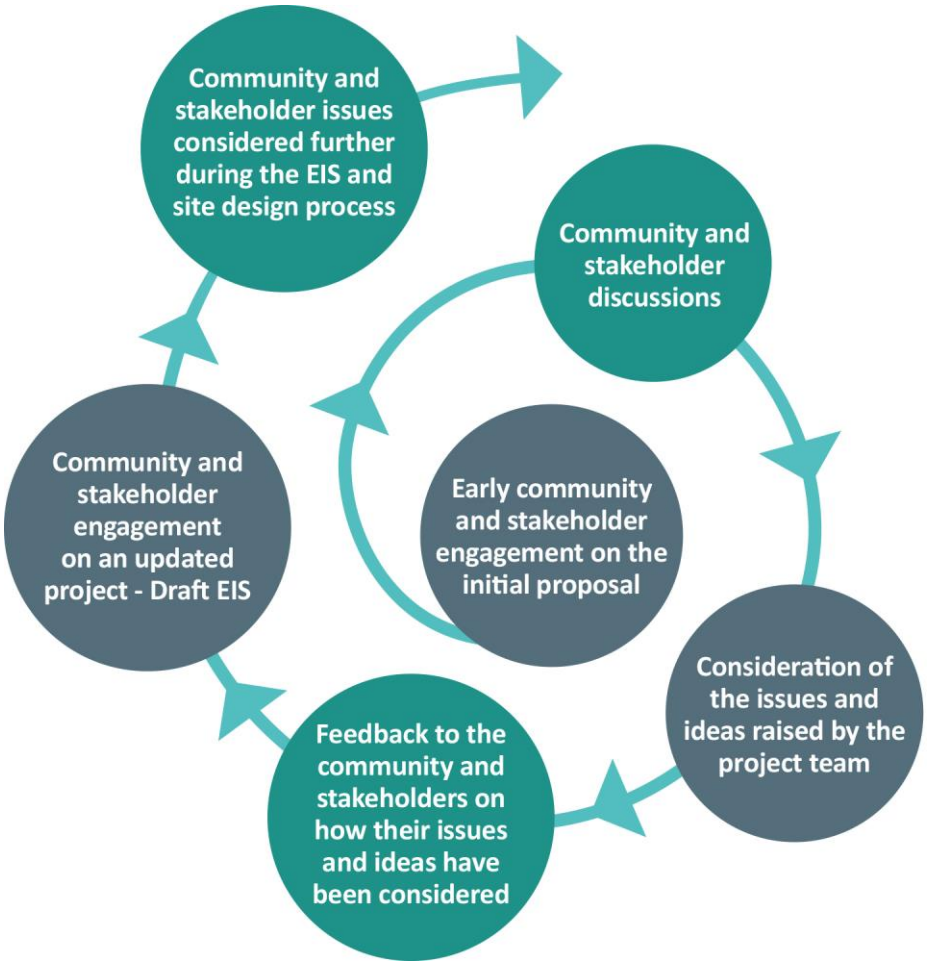
Figure 1 shows the steps in the community and stakeholder consultation process.

Figure 1 Community and stakeholder consultation steps



All issues and comments raised during consultation by the community, government agencies, and interest or stakeholder groups were recorded on a database. Various issues have then informed the proposal investigations and the ongoing design of the proposal. Figure 2 demonstrates this important cycle.

Figure 2 The engagement cycle



This report summarises the issues relating to the:

- Transport of municipal, commercial and industrial waste to the facility;
- Sorting of material to extract all possible recyclable items;
- Transport of recycled materials off site; and
- Transport of waste materials requiring disposal at another site (landfill).

The issues raised by stakeholders related to:

- The impact of air quality and community health issues;
- Economic and social issues;
- Traffic impacts and potential noise impact of increased traffic;

- The facility location and whether it should be located elsewhere;
- A lack of information on the consultation process to date; and the consultation process planned;
- The approvals process;
- Future governance of the facility – regulation and operational impact assessment;
- Questions as to whether this proposal and impact assessment represents best industry practice;
- The origin of the waste to be processed at the facility;
- The reputation of Benedict Industries;
- The zoning of the site and questions as to whether all proposed waste management activities are permissible;
- Visual impact and local amenity;
- Managing waste volumes now and in the future for municipal, commercial and industrial waste;
- Odour impact and management; and
- Fire risk management and the safe storage of waste.

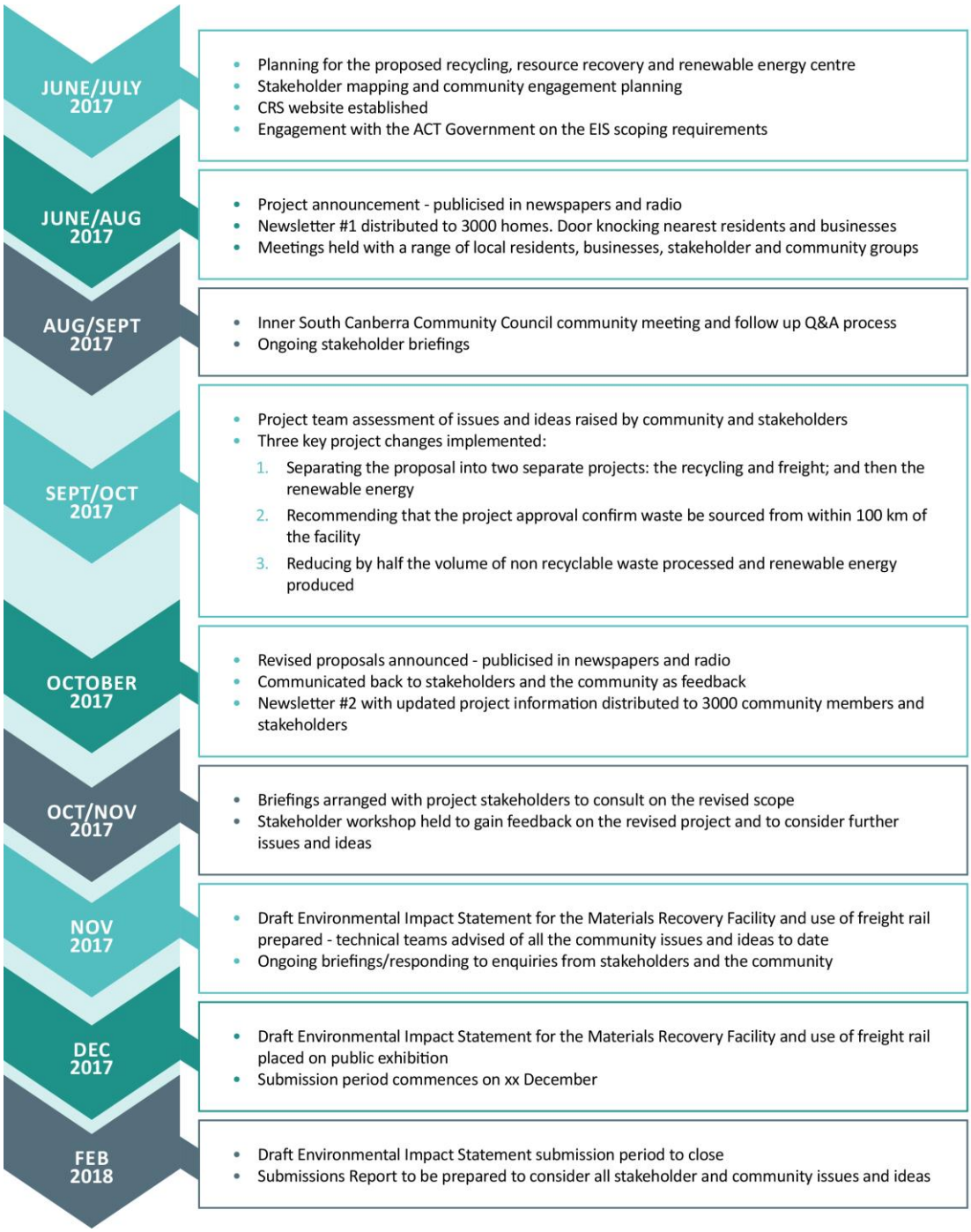
These issues are to be addressed by the environmental studies for the Draft Environmental Impact Statement. Should the proposal receive planning approval, community and stakeholder consultation would continue throughout the detailed design stage and then construction and operation of the facility.

1. INTRODUCTION

This document outlines the community and stakeholder engagement for the Materials Recovery Facility (MRF) at 16 Ipswich Street, Fyshwick ACT. In June 2017 CRS and ActewAGL Retail announced a proposal for an advanced recycling, resource recovery and renewable energy centre. The community and stakeholders were engaged for this proposal during July, August and September 2017.

The steps in the engagement process are described in Figure 1 and are shown below.

Engagement Steps



CRS has split the project into two separate Environmental Impact Statements (EIS) and development applications:

- The first being for the recycling and rail freight terminal component of the project, called a Materials Recovery Facility; and
- The second for the renewable energy component.

This will allow the materials recovery facility and rail freight terminal EIS to be considered while the energy conversion process studies are further considered by plant specialists, the community and local stakeholders in the future.

The document describes:

- the stakeholders;
- the community engagement activities undertaken;
- The communications collateral provided;
- The issues raised; and
- The next steps in the stakeholder community engagement process.

1.1 The Fyshwick advanced recycling, resource recovery & renewable energy proposal (June 2017)

Project Background

The ACT has one of the highest per capita waste generation rates in Australia and with a growing population needs green solutions.

In 2014 The Hon Simon Corbell MLA, the Minister for the Environment and Sustainable Development, announced a waste management policy for the ACT that allows for up to 23 Mega-watt electricity of feed-in-tariff entitlements, to encourage the establishment of an advanced thermal processing facility in the ACT by 2020. The intent of this policy was to encourage the deployment of proven and reliable technologies to vastly improve resource recovery rates from waste in the Canberra region, as well as meet the ACT's renewable energy targets whilst minimising landfill to less than 10%.

Capital Recycling Solutions and ActewAGL Retail plan to meet the challenge of an underdeveloped recycling market and the opportunity to employ advanced technologies to solve both ACT's waste problem and contribute valuable renewable energy to the local electricity network. CRS and ActewAGL Retail have proposed a facility at Fyshwick that reduces landfill; produces energy; significantly increases recycling of municipal solid waste and commercial and industrial waste; and uses rail as part of the transport solution.

Project Benefits

The potential benefits of this recycling and renewable energy centre include:

- At least 60 full-time jobs, 10 or more part-time jobs, and more than 80 jobs during the construction stage;
- Diversion of more than 90% of the targeted waste stream from landfill by 2025, subsequently reducing greenhouse gas emissions;
- A significant reduction in greenhouse gases - the methane that escapes from landfill is considered to be more than 20 times more potent than carbon dioxide;

- A new intermodal freight facility rejuvenating the ACT freight rail infrastructure, and subsequently removing trucks from Canberra and regional roads; and
- A $200 million privately funded investment for Fyshwick.

1.2 The proposed material recovery facility (October 2017)

CRS now proposes a best practice recycling centre to receive, sort, separate and reuse the ACT's household (red bins) and commercial and industrial waste that is currently going to Mugga Lane landfill. It includes sophisticated sorting technology to increase recyclables and a rejuvenated freight rail network to service the facility and other ACT businesses.

The goal is to lift recycling rates and recover at least another 20% of recyclable material from two waste streams which currently go directly to land fill. This will assist the ACT Government in achieving higher recycling rates and improve land fill avoidance.

Figure 3 Location of the facility at 16 Ipswich Street Fyshwick

Figure 4 Proposed Materials Recovery Facility

Material Recovery Facility Operations

Components of the MRF include the waste receiving shed, recycling process equipment, container loading facilities, associated hardstand, weighbridges and rail terminal.

The MRF would have a processing capacity of 300,000 tonnes per annum of recyclable materials and residues from recyclables. This design would provide for future capacity and a regional solution for municipal solid waste (MSW) and commercial and industrial waste by diverting some 90% of these materials from Mugga Lane landfill for processing.

Wastes would be delivered via a security controlled gateway from Lithgow Street. Vehicles would be weighed upon entry and then proceed into an odour controlled building. Vehicles would unload and pass through a wheel wash and leave the site via Ipswich Street spreading truck traffic and minimising flow conflicts.

The facility would separate and remove commercially recyclable materials such as paper, cardboard, certain plastics and metals. Inert and non-combustible materials such as glass, soil, aggregates would also be separated out and exported from the site. Plastics #1 (HDPE), #2 (PET) and #3 (PVC), metals, clean paper and other extracted recyclables would be baled and containerised. Containers of recyclable materials would utilise the proposed inter modal rail facility as much as possible, to transport some of this material interstate to environmentally viable reuse markets. Local reuse of material would also be sought.

Freight Rail Operations

The commercial scale intermodal freight terminal would utilise the established railway line on site to import waste and export recycled material. The 2,800m long siding called the 'south shunt' is located adjacent to the site. This would also allow importers and exporters to move containerised goods in and out of Canberra, with economic and environmental benefits**.**

1.3 ACT Government scoping requirements for community and stakeholder consultation

The ACT Environmental and Sustainable Development Department state that under Part 8 of the *Planning and Development Act 2007,* consultation must be undertaken with:

- Lease holders and land manager of land potential impacted by the proposal;
- Any recreation groups which will be affected by the proposal;
- Any volunteer conservation, landscape management or land care groups active in the area to be affected by the proposal; and
- The local community.

The consultation must:

- Describe the community consultation undertaken (methodology and criteria for identifying stakeholder and the communications methods used);
- Describe how concerns have been considered in light of the proposal and any future development planned; and
- The revised EIS must include the representations received, issues raised in the representations and a response to the issues and values identified. 1.4 Purpose and objectives of this engagement

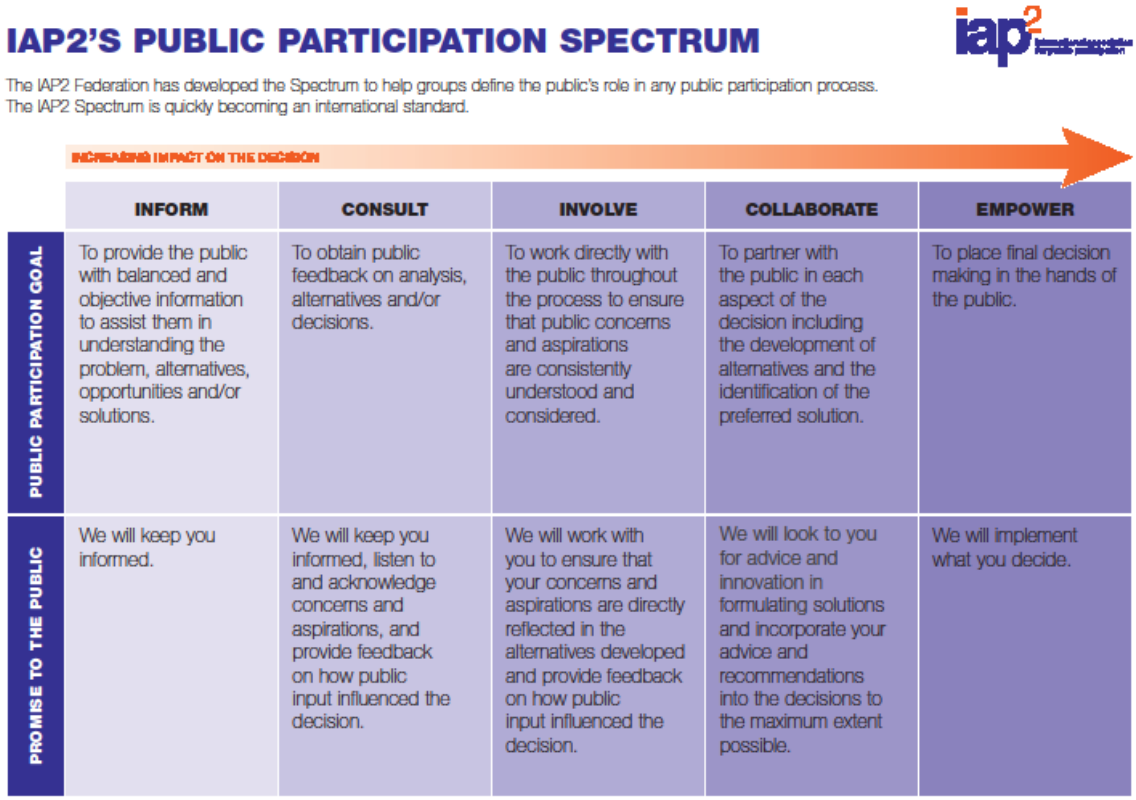
The objectives of the community and stakeholder engagement were to:

- Create awareness of the materials recovery facility, the rail freight terminal and the renewable energy facility proposals;
- Conduct an open and transparent public consultation and community involvement process; and
- Ensure that community feedback was included in the decision-making process during initial planning.

1.5 IAP2 Spectrum and Our Commitment to Engagement

The approach to community and stakeholder consultation was guided by the International Association for Public Participation (IAP2), an international body providing best practice advice on engagement. The IAP2 Spectrum for Public Participation has become an often-used standard in Australia, that aims to ensure public participation is given a place in the proposal planning, design and delivery phases (see Figure 4). The IAP2 standard has been used by the ACT Government in describing consultation requirements.

Figure 5 Public Participation Spectrum



IAP2'S PUBLIC PARTICIPATION SPECTRUM

The IAP2 Federation has developed the Spectrum to help groups define the public's role in any public participation process. The IAP2 Spectrum is quickly becoming an international standard.

INCREASING IMPACT ON THE DECISION

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Source: International Association for Public Participation (IAP2): http://www.iap2.org.au/

Given the nature of the proposal, the community and stakeholder consultation activities were conducted in accordance with the 'inform' and 'consult' level of the spectrum. In line with this level of participation, the goal for engagement was to provide stakeholders with clear information on the proposal, its current status and its potential impacts, and to listen to any concerns and obtain feedback for consideration in the development of the proposal and the Draft Environmental Impact Statement.

To achieve this goal, the following principles were established to guide the consultation program:

- Involving stakeholders shows respect for them. It recognises them as recipients and 'hosts' of the proposal and allows them to have some ownership of the proposal outcome;
- Using engagement techniques that effectively and meaningfully engage all stakeholders;
- Ensuring that all stakeholders have easy access to information about the proposal;
- Demonstrating that concerns and aspirations raised by the community and other stakeholders have been considered during the proposal development; and
- Ensuring that all information is provided in plain English.

1.6 Who are our stakeholders?

CRS and ActewAGL Retail identified a range of stakeholders to be included in the consultations for the proposal. These included: state government agencies; peak bodies; local unions; ACT rail stakeholders; residents; community associations; schools and colleges; and environmental groups.

The table below lists the stakeholder groups consulted during preparation of this EIS. It includes individuals and groups identified during the consultations.

Table 1 Stakeholder groups consulted July to November 2017

Type of stakeholder	Stakeholders	Communication to date
ACT Ministers	♦ Zed Seselja - Liberal Senator for the ACT ♦ Elizabeth Lee - Liberal MLA	♦ One on one meeting ♦ Telephone and email communications
ACT Greens	♦ Caroline Le Couture, Greens MLA	♦ Telephone communications
Scientific community	♦ Prominent academics ♦ Robin Tennant-Wood at UC (Assistant Professor in business, government and law) ♦ Hugh Sadler (Honorary associate professor at Crawford school of public policy and Research associate, centre for climate economics and policy)	♦ One on one meetings ♦ Briefings ♦ Telephone and email communications
Peak bodies	♦ Canberra Business Council ♦ Engineers ACT ♦ Public Health Association ♦ ACT Property Council of Australia	♦ One on one meetings ♦ Briefings ♦ Telephone and email communications
Rail stakeholders – ACT	♦ Australasian Rail - Freight and industry programs	♦ One on one meeting
Residents	♦ Narrabundah ♦ Fyshwick	♦ Newsletter
Community Associations	♦ Narrabundah residents Association ♦ Southside Village residential park ♦ Old Narrabundah Community Council ♦ The Inner South Canberra Community Council ♦ Canberra for Power Station Relocation (CPR) Inc ♦ North Canberra Community Council	♦ One on one meetings ♦ Briefings ♦ Telephone and email communications

	♦ The Griffith Narrabundah Community Association ♦ Southside Community Council ♦ Tuggeranong Community Council ♦ Canberra Friends of Dili ♦ Residents who attended a community meeting on 23 August 2017	
Nearby Businesses	♦ Fyshwick businesses surrounding the proposed site ♦ The Molonglo Group ♦ Narrabundah Medical Centre ♦ Fyshwick Fresh Food markets ♦ Fishco Fish markets ♦ Pialligo Winery	♦ One on one meetings ♦ Telephone and email communications
Schools and Colleges	♦ St Benedict's Primary School ♦ Narrabundah College ♦ St Edmunds College ♦ Narrabundah Early Childhood School ♦ Narrabundah College P&C and Board	♦ One on one meetings ♦ Telephone and email communications
Environment Groups	♦ The Conservation Council ♦ Canberra Power Relocation ♦ Friends of Jerrabomberra Wetlands	♦ One on one meetings ♦ Telephone and email communications
Unions	♦ Unions ACT	♦ One on one meeting

2. STAKEHOLDER AND COMMUNITY ENGAGEMENT PROGRAM

2.1 Approach

During the planning for the proposed MRF and freight rail facility CRS and ActewAGL Retail engaged with the community and stakeholders between July 2017 and November 2017.

The approaches to engagement included:

- Providing information to residents, businesses, stakeholder and community groups;
- Two-way interaction on a range of issues relating to the project; and
- Receiving community and stakeholder feedback for consideration as part of the environmental impact assessment studies.

All issues and comments raised during consultation by the community, government agencies, and interest or stakeholder groups were recorded on a database. Various issues have then informed the proposal investigations and the ongoing design of the proposal.

CRS and ActewAGL Retail provided information to the community with newsletters, presentations, doorknocking residents adjacent to the proposed site. Two-way interaction was achieved with one-on-one meetings with a range of individuals and groups. A stakeholder forum was held on 9 November 2017, and questions from that session were responded to in detail after the meeting. Feedback on all issues raised was collated and analysed.

The ongoing engagement will involve:

- Reporting on the outcomes of the engagement activities in this report;
- Incorporating lessons learnt into future local engagement;
- Regular updating of the CRS website as new information comes to hand;
- Distribution of updated engagement materials explaining the developments in the proposal;
- Progress and periodic engagement with key stakeholders to understand ongoing issues.

2.2 Information out

2.2.1 Community Newsletters

Two newsletters were developed to engage and inform stakeholders in Newsletter #1, July and in Newsletter #2, in late November 2017. The newsletters outlined the proposal concept, the proposed benefits of the facility, information about the next steps in the environmental impact statement process, information about the proponents and images and plans of the proposal. Both newsletters were delivered by doorknocking those nearest the facility and letterbox dropping to more than 3000 addresses including businesses and residences.

Figure 6 Newsletter #2 October 2017

OUR PROPOSAL

As you might already know, Capital Recycling Solutions (CRS) and ActewAGL Retail have been planning a new waste management and renewable energy initiative for the ACT.

The ACT Government is calling for innovative and sustainable proposals to improve recycling and to reduce the amount of waste going to landfill. As a result CRS and ActewAGL Retail are proposing an advanced centre for recycling, resource recovery and renewable energy.

Our plans include the latest technology in sorting and recycling materials, and then using world leading technology to convert non-recyclable waste into electricity. World's-best-practice air cleaning would mean no community impact. This electricity would feed directly into the ACT electricity grid. Trucks would be reduced on Canberra roads by using the new rail freight terminal which is adjacent to the recycling and energy centre.

THE PROPOSAL WILL BE DEVELOPED IN TWO SEPARATE ENVIRONMENTAL IMPACT STATEMENTS (EIS)

To date the community generally supports the principle of better recycling and using rail rather than road. There is a view that these things are missing in the ACT and should be implemented urgently.

CRS and ActewAGL Retail have announced they will provide two distinct separate statements and applications to the ACT Government:

- The first being for the recycling and rail freight terminal components of the project, which is planned to be provided in a draft EIS to the community in 2017.
- The second for the renewables waste to energy components of the project, which will be provided in a draft EIS to the community in 2018.

The proposal will be developed and displayed in two separate documents. The recycling and associated rail freight facility proposal, or a materials recovery facility (MRF) will enable CRS to get started on recycling ACT landfilled waste mid 2019.

FIND OUT MORE

Please contact us on 1800 334 696 or AdamP@capitalrecycling solutions.com.au if you register with us we can provide more information as the project progresses.

The website Capitalrecyclingsolutions.com.au contains additional information and responses to many of the questions that have been put forward to date. We look forward to talking with you and the wider ACT community.

Capital Recycling Solutions

FYSHWICK ADVANCED RECYCLING, RESOURCE RECOVERY & RENEWABLE ENERGY CENTRE

COMMUNITY AND STAKEHOLDER UPDATE #2 OCTOBER 2017

Figure 7 Newsletter #1 July 2017

THE CONCEPT

An innovative and comprehensive hub for advanced recycling, resource recovery and a renewable energy generation facility has been proposed for Fyshwick.

Capital Recycling Solutions (CRS) has proposed a comprehensive solution that would significantly increase recycling, reduce landfill and produce renewable energy to power Canberra homes. It also includes a freight rail terminal to take trucks off roads.

CRS proposes to process these waste streams to divert more than 90% of the waste that is currently going to landfill and increase significantly ACT's recycling and also generate electricity. This will have high environmental benefits, in particular reducing greenhouse gas emissions.

Subject to approval, the hub will bring world class environmental technology to a greener Canberra from 2019.

WHY NOW?

The concept is a response to the ACT Government's call for innovative and sustainable proposals on how best to improve recycling and reduce landfill in the ACT. The Mugga Lane tip has limited space available in future. This project would have many environmental benefits and reduce the need for tip expansion.

BENEFITS

- Massive improvement in ACT recycling rates – diverting more than 90% of waste currently going to landfill, reducing greenhouse gases
- Renewable power for over 28,000 ACT homes
- Smart recovery of recycled and reusable materials
- Rail freight intermodal container terminal taking ACT freight off roads
- 60 full time and 10-part time employees plus 80 construction jobs

WHAT'S NEXT?

CRS is preparing a Draft Environmental Impact Statement (EIS) over the next few months and is interested in your feedback. Please contact us on 1800 334 696 or ewen@benedict.com.au - we look forward to talking with you and the wider ACT community.

ABOUT US

CRS is a joint venture between Benedict Industries & Access Recycling. CRS has established a joint venture with ActewAGL Retail for the establishment of a Waste to Energy facility up to 30MWe for the electricity production and sales. CRS owns the 2ha project site at 16 Ipswich Street, Fyshwick (Old Shell Petroleum site).

FOR MORE INFORMATION VISIT capitalrecyclingsolutions.com.au

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Visit: CapitalRecyclingSolutions.com.au

2.2.2 Capital Recycling Solutions website

CRS has developed a comprehensive website (online since June 2017) to provide the community with information and news about the proposal. It outlines the proposal concept, the benefits of the proposal, information about the EIS process, details of the proposed recycling process, freight rail operations, proposed site layout, images, plans and a video virtual tour of the proposal site.

It also includes information about the proponents, meeting notes, maps, media activity, frequently asked questions, case studies of similar proposals and an enquiry form using email.

The website address is: http://capitalrecyclingsolutions.com.au

See Appendix A for sample Capital Recycling Solutions website pages from October and November 2017.

2.2.3 Media releases and media coverage

The facility is an important community issue and there have been regular news articles about the proposal in Canberra's metropolitan and local media outlets (print, online and radio). Media releases were developed and distributed to news providers.

Online community forums and social media have also contained regular commentary. Sentiment expressed in these forums ranges from neutral to concern.

The following table details some issues captured in the media during consultation.

Table 2 Print and Online newspaper articles

Source	Title	Key Message
Canberra Times 27 July 2017 Letter to the editor	Waste plant a win	Comment on the benefit of the proposal producing renewable power for the future, rather than power provided by using fossil fuel sources.
Canberra Times 22 August 2017	Fyshwick Recycling and renewable energy centre faces public grilling	Comment on the Inner South Canberra Community Council meeting to discuss the project and outlined the proposal.
ABC News 27 August 2017	Rubbish for Energy faces an uphill battle	Comment on the perceived project hurdles - community opposition driven by air quality concerns and the need for the proponent to seek a feed-in tariff from the ACT Government.
Canberra Times 28 August 2017	$1 million NSW grant boosts Access Recycling new freight depot at Fyshwick	Looked at government grant to Access Recycling to develop a new freight depot on the proposal site.

Canberra Times 31 August 2017 Letter to the editor	Think of the neighbours	Comment on concerns about emissions monitoring and the proposed location of the facility.
Canberra Times 27 October 2017	Waste to Power Plant Proposal Delayed	Comment on the decision to submit two separate EIS applications and to halve the capacity of the renewable energy component.
Canberra Times 29 October 2017	ACT Greens Slam Canberra's proposed Waste to Energy plants	The ACT Greens provide comment on the proposed waste-to-energy facilities in Canberra, saying such processes potentially present health and environmental concerns.
Radio 2CC 8 November 2017	Discussion on proposal	The announcer and Adam Perry discussed how the proposal meet the ACT renewable energy target and that recovering energy was better than landfill.
Riot Act Blog 10 November 2017	Greens put torch to Fyshwick waste burner proposal	ACT Greens Leader Shane Rattenbury comments that the ACT Greens would not support the proposal.
Conservation Council 16 November 2017	Waste a burning Issue?	Noting that CRS contacted the Council in late October, stating that they would be removing the waste-to-energy component from their current proposal due to the expectation it would prevent approval of the entire proposal.

2.3 Two-way interaction on project issues

2.3.1 Free call phone number and email

A free call (1800) number and project email were established in June 2017 and have been maintained to assist the community to provide their thoughts and comments on the project, to make enquiries and to discuss details of the proposal. Calls and emails were answered during business hours and a mailbox was available outside business hours that enabled callers to leave a message and have their call returned the next business day.

2.3.2 Doorknocking and letterbox drops

Representatives for CRS and ActewAGL Retail doorknocked over 200 surrounding residents in July 2017 to introduce the proposal, discuss details of the project and record and respond to initial feedback. Doorknocking was completed in July 2017 for the following:

- Residents in Narrabundah in an area closest to the proposal site.

- Fyshwick industries surrounding the site.
- Fyshwick Fresh Food Markets stall holders.

Comments from residents and business in these areas were a mix of positive, negative and neutral. The nature of various responses were recorded on a database and some sample comments are recorded in the doorknocking notes as follows:

- The occupant was interested in the proposal, on the basis of the information provided. He commented that he was pleased to see some changes around the community
- The occupant expressed a positive reaction in the proposal, on the basis of the information provided. He was interested in knowing about new job opportunities at the facility for the community
- Occupants were concerned about the potential odour from the plant, and were interested in the air-quality control checks. They were pleased to know that more employment opportunities would be a result of the plant construction
- The occupant expressed a positive reaction in the proposal, on the basis of the information provided. No concerns or question were raised
- The occupant expressed a negative reaction to the proposal. He mentioned that there was already a problem with noise in Fyshwick 10 months ago and that with this plant it will be worse. He was also concerned about the smoke. He agrees that recycling is important but thinks that this kind of industry should be located far away from residents.
- The occupant expressed interest in the proposal. She encouraged the door knocking to continue. She was pleased to receive the information and had a good reaction to being informed about the potential benefits from the construction and operation of the plant.
- The occupant was interested in the proposal and agrees with the door knocking initiative.
- The occupant expressed a negative reaction to the proposal. She felt that the plant was too close to the residential area, and a waste of the tax payer's money. She felt that the people should have been consulted first before any plans were made. She noted that energy costs will increase as a result of the plant construction. She also wanted to know who was funding the project, and was concerned about accidents that could occur like the recycling plant that caught fire in Melbourne. She was concerned about the revival of the new Canberra Railway Station and how the proposal would affect it.
- The resident expressed a positive reaction to the construction of the plant, and believed that there is a necessity for this kind of industry.

The newsletter was delivered by letterbox to more than 3000 properties in total. The specific areas completed for letterbox drops were:

- The Causeway, Kingston Foreshores and Wentworth Avenue (from Dawes Street to Hely Street), around 300 letterboxes;
- Narrabundah and Fyshwick, around 2500 letterboxes; and
- Southside Village /Canberra South Motor Park, around 190 letterboxes.

The letterbox and doorknocking locations are shown in Appendix B.

2.3.3 Stakeholder meetings

Elected Representatives

CRS and ActewAGL Retail representatives met with elected government representatives to discuss the proposal. These briefings provided an opportunity for elected representatives to provide input and to obtain information to provide to their constituents. The project team met with:

- Planning and Natural Resources Senator Zed Seselja; and
- Elizabeth Lee MLA.

Peak Body Consultation

CRS and ActewAGL Retail also met with or spoke on the phone to a number of ACT peak bodies. They were provided with information about the project and could request clarification on project details, and provide their input and feedback on the proposal. The project team met with:

- Australasian Rail Association;
- Canberra Business Chamber Board;
- Public Health Association;
- The Property Council;
- The Conservation Council of ACT; and
- Unions ACT.

Meeting with Surrounding Property Owners/Businesses/Institutions

Meetings have been held with surrounding business/property owners and institutions to advise them of the proposal details to discuss and seek their issues. These meetings will be ongoing throughout the planning process. The project team met with:

- Fyshwick Food Markets;
- Holcim Concrete;
- Narrabundah Family Medical Practice;
- Narrabundah Early Childhood School;
- Narrabundah High School;
- Narrabundah College – Board and P+C;
- Southside Village Residential Park;
- Wentworth Avenue Medical Centre;
- Narrabundah Family Medical Practice;
- St Edmunds School; and
- St Benedict's School.

Community Groups

A number of community and special interest groups have been contacted during the consultation process. These groups were identified and approached because of the input they could provide to the proposed recycling facility, and their knowledge of local economic, social, cultural and environmental issues. Community groups provided with information about the proposal included:

- Canberra for Power Station Relocation (CPR) Inc;
- Canberra Friends of Dili;
- Inner South Canberra Community Council (ISCCC);
- North Canberra Community Council;
- Old Narrabundah Community Council;
- The Griffith Narrabundah Community Association;
- Friends of Jerrabomberra Wetlands;
- Concerned Canberra Residents;
- Tuggeranong Community Council; and
- Narrabundah Residents Association.

2.3.4 Community meeting hosted by the Inner South Canberra Community Council

On 23 August 2017, the Inner South Canberra Community Council held a public meeting in Narrabundah to present information and encourage discussion about the proposal. CRS and ActewAGL Retail were ready participants in the Council's initiative and welcomed the opportunity to present information about the proposal to over 200 people.

Presenters at the meeting included:

- George Sidias from the ACT Government, Department of Planning to explain the planning process
- Dr Diana Wright, former head of the Environment Quality Division, Federal Department of Environment, on the merits of renewable energy as a form of waste management.

  The presentation highlighted the existing environmental issues around the use of landfill, including contaminated dust going into the atmosphere, the prevention of fire and the deterioration and/or the lack of protective linings in current landfills around Australia.

  Coal fired power generation high pollution issues were discussed in comparison to (lower) renewable energy pollution outputs, including for NOx, SOx and dioxins.

  Several successful overseas waste-to-energy operations were described. The current European air quality standards were cited as best practice. The waste-to-energy process to destroy a number of hazardous chemicals using high temperatures was described. This includes dioxins and furans. Noted that dioxins and furans are currently generated in coal fire power stations. Cited 2007 studies of high temperature incinerators that demonstrated substantial improvements from 1990 to 2005. It was noted by Dr Wright that the recycling question must be addressed – burning waste must be at the bottom of the ladder. Proposition put to audience was that if you control the inputs and the outputs, and use the best available technology, and have good governance around operations, then waste-to-energy facilities can be effective.
- Leo Dobes, President, Griffith Narrabundah community association, presented on the potential health issues of waste-to-energy. Mr Dobes raised questions he would like to see resolved by the proponents and the ACT Government. These questions include detailed air quality assessment methods, and the need for and funding of operational governance and regulation.
- CRS and ActewAGL Retail presented information on the proposal rationale, the recycling process, the location of the proposed site, the freight rail facility, the benefits of the proposal, proponent partnership details, the Environmental Impact Statement process, and community consultation completed to date.

Prior to the meeting a list of 32 questions for the proponent was published on the Inner South Canberra Community Council website. CRS and ActewAGL Retail provided answers to these questions in a handout provided to every attendee at the meeting. See Appendix E for the handout.

Project information display boards with general information about the proposal were placed in the meeting area for participants to review. See Appendix F for the display boards at the public meeting.

The meeting identified a range of community issues and CRS and ActewAGL Retail participated in a question and answer session to address inquiries and concerns. All questions asked by community members at the meeting were captured in meeting notes later published by the Council. Community members were provided with a feedback form to request further information from CRS and ActewAGL. These were collected, and detailed replies were provided to each person after the meeting. Questions and comments from the participants were recorded and used to assist in the proposal and community consultation planning.

Figure 8 Inner South Canberra Community Council public meeting

Figure 9 Display boards at ISCCC public meeting

2.3.5 November 2017 stakeholder workshop

On 9 November 2017 CRS invited some identified interested stakeholders to a workshop held at the EastLake Football Club, to provide them with a project update and to discuss their thoughts.

Following the August, September and October conversations, significant changes had been made to the project as a result of community feedback. This workshop was to discuss the ongoing community engagement process and to talk to a group of concerned stakeholders about how they would like this to occur in the future. There were about 30 people in attendance. The meeting discussed the following topics:

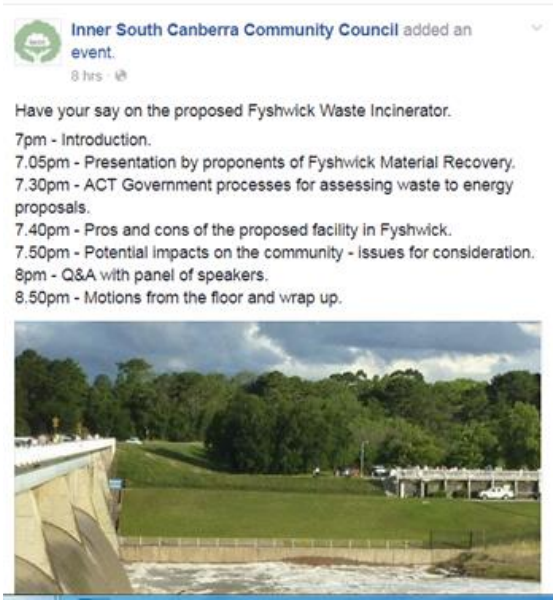
- CSR explained they have received positive feedback regarding the recycling plant and rail terminal, and therefore planned to apply for approval for these two things. The Draft Environmental Impact Statement was planned to be published in December 2017.
- CRS explained the size of the facility being proposed has been reduced as a result of stakeholder and community consultation. The size of the energy facility proposed has been reduced from a 30 Mega-watt of electricity plant to a 15 Mega-watt of electricity plant, or from 270,000 tonnes of fuel feed per year to 135,000 tonnes per year. CRS felt this would respond to the community concern of a 'feed the furnace' operating mentality. CRS also highlighted that currently more than 300,000 tonnes of waste per year going to landfill at Mugga Lane.
- CRS have modified the proposal as a result of feedback from the community regarding concerns waste being processed at the facility that was from distant areas such as Sydney. It was explained the facility could provide a regional solution for smaller regional communities located outside the ACT. As a result, CRS recommends a radius restraint of 100 km to source waste.
- The majority of the workshop meeting was spent taking questions from the floor which was an effective way to discuss issues and ideas. Information was requested on site lease arrangements, how the scoping requirements would apply to each EIS, the combined traffic from the freight rail facility and website management facility, the length of the EIS exhibition and submissions period, and Canberra Transport planning documents (and how this freight rail line met ACT Government planning).
- Meeting notes were taken and slides were circulated to attendees.

2.3.6 Social media

During the consultation period social media and local community websites discussed the proposal. General articles and comments about the proposed facility were published on the following social media sites and websites:

- 'Say no to Fyshwick incinerator" (Facebook site)
- Inner South Canberra Community Council (website)
- Old Narrabundah Community Council Inc (website)
- The Riot ACT, Canberra News and Opinion (Website site)
- Elizabeth Lee (twitter handle)
- The Canberra Times website (website)

Figure 10 Examples of online postings, Inner South Canberra Community Council and Old Narrabundah Community Council



Social media items tended to focus on concerns about the source of waste, health issues related to air quality changes, environmental issues, and the request for further community consultation. Where possible, stakeholders with questions or comments were contacted directly to further discuss and assist with issues.

Media monitoring will continue during the display of the Draft Environmental Impact Assessment.

3. RESULTS FROM THE ENGAGEMENT ACTIVITIES

3.1 Summary of comments and issues raised regarding the proposal

During the consultation process, feedback received from the stakeholder and community was entered into an issues database. Each of these topic items and the related questions have been provided to the technical study specialists for consideration in preparing the Draft Environmental Impact Statement.

Feedback included comments recorded during stakeholder engagement, up to November 2017, from:

- telephone interviews
- stakeholder briefings
- 1800 information request calls
- feedback forms
- written submissions
- meetings and forums
- social media, and
- e-mails.

The issues detailed below relate to both EIS submissions. Many people offered their thoughts on the entire project prior to the decision to provide two separate Draft EIS documents. As such, some comments are specific to each Draft EIS and some are general to both EIS's. The table below shows the summary of issues.

Table 3 summary of issues

ISSUE		APPROXIMATE MENTIONS
Impact of changes to air quality and potential community health issues		
Emissions and monitoring	27	42
Air quality guidelines	5	
Community health	7	
Source of waste and responsibilities for management of the waste		23
Recycling, for example the contents of recycling, and what materials can and cannot be processed, etc		22
Economic and social impacts, including the potential for a drop in house values because of the proposal		32
Traffic and the potential for noise impacts from increased traffic		25
The facility location and whether it should be located elsewhere		17
A lack of information on the project to date and the ongoing consultation process		21

The approvals process and future governance of the facility – regulation and operations impact assessment	14
Questions as to whether this proposal represents industry best practice	14
The reputation of Benedict Industries and mentions of the Four Corners program relating to the recycling industry	3
The zoning of site – questions as to whether the proposed activity is permissible	4
Visual impact and local amenity	3
Odour impact and management	4
Noise from the freight rail proposal	2
The carbon footprint of the proposal	1

Details of questions / comments for each issue group are listed below.

3.2 Comments and issues raised regarding the proposal

3.2.1 Impact of changes to air quality and potential community health issues

Stack emissions

- What emissions will come out of the stacks?
- This has not been modelled yet? Why not? How can we comment until this is done?
- The total pollutant load is what is important. This means the incinerator and with maximum background pollutant levels – what will maximum pollutants be on these occasions?
- Can you compare your emission levels with the current methane emissions at the tip?
- Can you provide a rough estimate of the compliance budget and some insight as to how this was derived – e.g. number of employees, number of monitoring stations, frequency of sampling, costs of analysis, and the timeframes between sampling and response.
- What are the current ambient levels of odour, smoke, dust, noise, particulates, greenhouse gases, other gases (e.g.: Hydrogen Sulphide, Sulphur Dioxide), arsenic, chromium, dioxin, and furans at Hume, Fyshwick, Manuka, and Civic. How are these levels expected to change at each of the localities specified following the establishment of the proposed waste incinerator in Fyshwick?
- How does the projected level of various pollutants following the establishment of the proposed Fyshwick Waste Incinerator compare with the current level of pollutants attributable to wood burning for domestic heating?
- Would any new limits on various pollutants introduced as a result of the proposed Fyshwick Waste Incinerator apply to pollutants already present due to current activities such as wood burning for heating?
- What particulate matter will be released? What are the projected emissions and gases?
- How will your emissions compare to the Mitchell Resource Management Centre?
- What will the CO_2 emissions be?
- How will the facility dispose of and deal with the stabilised fly ash and other emissions?

- We Canberrans are worried about the inevitable emissions from such an incinerator?
- How are we going to ensure that the incinerator does not release them when the filters are cleaned or the temperature drops for some reason?
- Where and how will the highly toxic fly ash from the incinerator to be stored and processed?
- Concern with temperature inversion in Tuggeranong impacting residents and businesses and the impact of arsenic from treated wood being released in the process
- There is no background air quality monitoring in Fyshwick currently to provide existing baseline data. How can we estimate the effect on air quality from the new facility?
- Why would we plan to monitor dioxins in the emissions if they are being destroyed in the incineration process? Dioxins must be monitored to capture both average and peak levels throughout operations.
- What will be in place to monitor longer term impacts on the population (something along the lines of the Government's longitudinal study of residents in Mr Fluffy houses might be desirable).
- Will there be a fully independent body charged with monitoring the facility for odour, smoke, dust, noise, particulates, greenhouse gases, other gases (e.g. H_2S, SO_2), arsenic, chromium, dioxin, furans, heavy metal residue in the ash, acid residues in the ash, and compliance with all other agreed performance criteria?
- Will there be continuous air quality monitoring at the facility?
- We need to improve background air pollution monitoring practices in ACT for this facility.
- Cancer-producing dioxins and toxic heavy metals may be mostly filtered out or burnt, but will the facility have the level of monitoring and regulation required to constantly watch for these dangerous and often invisible pollutants?
- Who will be responsible for monitoring emissions round the clock?
- This area has local inversion pockets, so will the meteorological studies account for these?
- What will happen in nearby valleys where we have temperature inversion?

Air quality standards and guidelines

- Australian air quality standards – need to be brought up to standard to include expected waste to energy emissions to have a social license to operate.
- Why are the European Standards in air quality not adopted in Australia?
- Does the ACT have legislation that covers airborne pollution, and, if not, will it be a precondition that the ACT adopts legislation similar to that of NSW?
- Is the EU standard really the best in the world for air quality? Shouldn't you be relying on World Health Organisation standards?
- Will the facility have stringent parameters set for the recording of all public participation and community impacts?
- What are the relevant Australian regulations and limits that the proposed facility will need to adhere to, and how do they compare with the EU regulations? How do we ensure this plant will adhere to BAT and be regulated and monitored closely?

Community health

- Among the most concerning pollutants for human health are carbon monoxide, sulphur dioxide, nitrogen oxides, volatile organic compounds, ozone, heavy metals, and particulate matter, all of which are linked to health issues.

- The reason why people are not burning waste everywhere around the world, is that it is impossible to run a waste incinerator which does not produce cancer causing dioxin, furans and toxic ash as by products.
- A similar proposal in NSW at Eastern Creek has been rejected by the NSW EPA and Department of Health. Why are we doing this in the ACT?
- CRS has stated that the evidence supports no health impact to residents. There were 2 studies completed in Scotland and France showing cancer clusters among aged populations near facilities. So how can CRS justify their statements about no impact to health?
- Has our health system thoroughly checked research about increases of cancer in regions where such incinerators have been installed?
- The potentially negative health effects of emissions are probably the most problematic. Comparisons with other countries would require comparable data on existing pollution levels, feedstock used by incinerators, and the effectiveness of the flue gas cleaning systems. And real-time information on carcinogenic dioxins is not available, because only ambient concentrations outside the incinerator are measured occasionally.
- The health impact to the community include their perception of, or worries about, health impacts.

3.2.2 Source of waste and responsibilities for management of the waste

- Are there any recent baseline studies of the composition of Canberra's Municipal Solid Waste (MSW), Commercial and Industrial waste (C&I waste) and light residues from Construction and Demolition waste (C & D waste) (cardboard and other packaging, timber and plasterboard offcuts).
- How do the feedstock profiles of these facilities compare with those of Canberra's mix of MSW, C&I and C&D waste?
- How do you propose to totally exclude plasterboard (mainly composed of Calcium Sulphate and incinerates to Sulphur Dioxide) from the incinerator and how will this impact on the viability of the proposal?
- How is the introduction of container deposit legislation expected to influence the composition of MSW and C&I waste?
- Will you be taking existing waste from Mugga Lane tip?
- Will you ship waste in from interstate, like NSW?
- Will you import waste from outside the region?
- Will you have responsibility for the waste that that goes through your facility?
- Will a different company pick up our bins?
- What is the process for how waste will come to the facility? Will you pick up waste from the tip?
- Concern that tonnes of local garbage and more is being trucked in from interstate.
- Does this mean Canberra will soon be getting another golf course built on tonnes of 'recycled' garbage
- What is the maximum amount of paper, cardboard and other flammable materials that are to be stored at the facility before incineration?
- Why is NSW not recycling in NSW? What plans are in place to ensure there is no illegal dumping related to the facility?
- Why is an estimated 150 000 tonnes of waste coming from Sydney?
- What percentage of waste is coming from interstate compared to the percentage from the ACT?
- Will you bring waste into the ACT?

- Thousands of tonnes of Sydney refuse will be freighted into Canberra as feedstock for the facility. This is unacceptable.
- Why are we importing garbage?
- ACT should not be importing waste from interstate.
- Let Sydney have the incinerator and the ACT can send its waste there.
- Why are we accepting waste from Sydney to be processed by Veolia? Why can't we just process ACT waste? Surely, we aren't a dumping ground for wealthier and dirtier Sydney?
- Because efficient 24-7 operation would require importation of waste from NSW, should the analysis be conducted from the perspective of the ACT alone, or from an ACT-NSW perspective?

3.2.3 Recycling

Recycling and waste to energy

- We should be recycling instead of burning waste, as burning waste should be the last option on the waste management ladder
- The ABC 2017 Four Corners program on the recycling industry highlighted issues with recycled waste being stored rather than properly recycled and reused. What assurances are there that effective recycling will occur?
- There is concern there is a 'feed the furnace' mentality with a waste-to-energy style facility. How will this be avoided?
- There are incentives to recycle. Will a levy be applied to the incinerated waste that is not recycled?

What can and can't be recycled?

- How will glass recycling be dealt with?
- What happens to waste from industrial demolition? Where does that go?
- 20% of wet garbage is non-recyclable. What will happen to it during the sorting process?
- Will CRS accept construction waste? What happens to wood?
- How will kitchen waste/food be dealt with?
- Will Polystyrene be recycled or incinerated?
- What things won't be captured and recycled?
- Request for more information about the destination of recyclables, once they are processed
- Concern that if we do the recycling in the proposed facility, the community will be less interested in doing it themselves
- Will anything change for the cardboard that we currently recycle? How will the waste be transported?
- Are we going to take additional waste from NSW in order to feed this immense machine, and do we want to import such waste?

End Markets

- Request for more information about the destination of recyclables, once they are processed.

Recycling Philosophy

- Concern that household bin recycling was not included in the presentation at the community meeting, and should be explained as the first step in the recycling process.

- We need to reduce, reuse and recycle but not incinerate.
- The big question is, should we resort to burning our waste when other countries are tackling the waste problem more intelligently at its source?
- In this proposal there has been oversight of the recycling solution – this needs to be the priority.
- Concern that if we do the recycling in the proposed facility, the public will be less interested in doing it themselves.

3.2.4 Economic and social impact of the proposal

- What return will there be to the taxpayer from the proposed new rail infrastructure? Why is the NSW and ACT Governments funding a railway upgrade for a private proponent to use?
- The emission control systems sound very expensive - how will this stack up economically? i.e. will corners be cut if its too expensive to operate optimally?
- Where is the social impact assessment - do the scoping requirements include this?
- If the proposal does proceed what would be the financial gain and loss to ACT? What will the ACT government charge NSW to bring waste in?
- Will profits be put before community safety?
- Does the project include a gate fee for trucks delivering waste?
- Will our Council rates go up if the ACT Government introduces a waste levy?
- This proposal should be seen as positive, as industry and jobs are important for the Fyshwick area.
- How many jobs will the new facility create?
- Will costs be reduced for our energy, once the facility start producing electricity?
- Can the facility be expanded in the future?
- Will there be employment prospects from the proposal?
- How will the proposal affect the local economy? Will there be jobs for locals or will people be brought in?
- What is the size of the investment to bring the proposal to operating level?
- There are 400 children within 2 km of the proposed facility, and this proposal is a concern for the health impacts on kids.
- What will be the charges to industry to use the facility and how will these impact on any commercial levies? What will be the difference in costs opposed to what we are currently being charged?
- Who will meet the costs of monitoring and ensuring compliance – the proponent, or the ACT taxpayer?
- Can you give a rough estimate of the monitoring and regulatory compliance budget and how this budget was derived – e.g. no of employees, number of monitoring stations, frequency of sampling, costs of analysis, and the timeframes between sampling and response.
- What is the price per kWh that CRS expects to receive from its sale of electricity to ActewAGL Retail? If this is more than the feed in tariff offered to private citizens, is CRS not being subsidised by the ACT Government?
- What does CRS expect to be paid to receive:
  - NSW waste and
  - NSW sewage sludge?
- What does CRS expect to be paid to receive:
  - ACT waste and

- CT sewage sludge?

- What would be the annual saving to the ACT Government of any estimated reduction in landfill?
- Has the levelised cost of electricity been calculated with the inclusion of a carbon price?
- The proposed plant will negatively affect our business through environmental impacts and negative perceptions seen by existing and potential residents of surrounding areas. How do you propose to change this perception?
- Concern the gain in jobs from the facility will be offset by a possible loss in residential and commercial development in the area as people relocate to avoid being close to the facility. Do you agree?
- Will it cost us more as a business to recycle? Will we need to get new bins?
- Although the ACT government's 2011 Waste Management Strategy stated that the government would continue to investigate the costs and benefits of waste streams to "deliver the maximum benefit to the Canberra community", there is no evidence that a rigorous social cost-benefit analysis has ever been conducted.
- A genuine and rigorous social cost-benefit analysis of Canberra's waste management alternatives would need to consider not only expansion of ACT landfill sites, but alternatives such as incineration (which also requires landfill for toxic residues), increased recycling, anaerobic digestion and composting, deposit schemes for drink containers, higher charges for red bin collection (or smaller bins), and even purchase of land in NSW for dumping Canberra's rubbish.
- An estimated cost-benefit ratio for solid waste combustion and incineration was about three times more than coal-fired electric power generation. For every $1 billion in value added to the economy, the environmental cost was $6.72 billion.
- Has the levelized cost of electricity been calculated with the inclusion of a carbon price?
- Concern the ACT will be ‘the garbage capital of Australia’. What impact will the new facility have on the house values of nearby suburbs?
- Due to negative connotation surrounding waste to energy, will it decrease house values in adjacent suburbs (Narrabundah, Red Hill and Kingston) and by how much? Should I sell up now?

3.2.5 Traffic and the potential for noise impacts from increased traffic

- Concern the traffic flow will be beyond comprehension.
- Concern that trucks will be backed up along Ipswich St.
- Thinks that trying to get out of Ipswich St. will be impossible.
- The rail shunt will have trucks along the site as well so a traffic assessment is a must.
- The facility will be surrounded by expanded activity and only trucks that pick up red bins, so arrival slots and co-ordination will be essential.
- Large buffer areas needed for surge in traffic.
- Traffic is topical - need to be accurate about what the numbers are. Counts in all areas - Need to not theorize.
- Operating hours need to benefit the wider community by spreading out site access times.
- Entrance site is in Ipswich Street is extremely dangerous already.
- Is it possible to have the entrance off Lithgow Street and exit onto Ipswich Street? And plenty of signage to say that trucks are turning ahead.

- We believe that more should be transported by rail, how are you going to help this happen?
- How will traffic enter site off Ipswich St safely? Will traffic exit via Lithgow St safely?
- Concern that the traffic in the area is already a problem with trucks from surrounding industry.
- What are the impacts on traffic?
- Will there be interference with bus stops?
- How will parking work?
- What size will the garbage trucks be and will there be different sized trucks?
- What number of garbage trucks coming into Fyshwick?
- The suggestion that the potential delivery of waste by rail to the facility would reduce road traffic seems to be unlikely. ACT waste material will continue to be delivered by truck with the destination changed from Mugga Lane tip to Fyshwick, so any increase in rail traffic will only eventuate if suppliers of NSW waste choose to deliver it this way. To the extent that NSW sourced waste material is delivered by truck road traffic will increase
- What are the minimum and maximum estimates of truck movements to service the facility, including monthly deliveries and removal of ash and recyclables, assuming no material is delivered or removed by rail?
- What is the smallest estimate of truck movements needed to service the facility, including both deliveries of waste and sewage sludge, and removal of ash and recyclables?
- What is the largest estimate of such truck movements, assuming no supplier chooses to deliver or remove material by rail?
- How would projected truck movements to and from the proposed Fyshwick Waste Incinerator compare with existing truck traffic to the Mugga Lane tip and any other waste disposal site in Canberra (please specify the location of any such).
- Would the establishment of the proposed Fyshwick Waste Incinerator increase or decrease truck traffic through inner south Canberra, and by how much?

3.2.6 The facility location and whether it should be located elsewhere

- Why have you chosen Fyshwick for the facility location?
- There is no discussion on the impacts on residents, and there won't be any evidence of impact until the facility is operational.
- The location chosen is highly disruptive to surrounding businesses and residents.
- Why wouldn't you build at Woodland or put it at Mugga Lane tip that is zoned for that purpose?
- Mugga Lane had a maximum life span of 20 years and is still going 40 years later. Over 30 sites were examined for the Mugga Lane tip, so there should still be plenty of sites elsewhere to choose from.
- Was the location chosen because of the railway?
- The proposed facility will be 650 metres to the nearest residents and a kilometre from three local schools, a fresh food market and the Eastlakes development. Our government is brave, indeed perhaps arrogant enough, to contravene its own territory plan.
- Don't believe the proposal will go ahead at chosen site. If it goes anywhere Hume is the preferred site, as the land near Fyshwick is to be developed for housing.

- A site less than half a kilometre away from residential dwellings and commercial hubs, including the Fyshwick Food Markets is an unacceptable impact.
- Why does the incinerator need to be located so close to a city? Australia is a huge country. The incinerator should be situated far away from people.
- Development on the Kingston foreshore has helped make the area one of the most desirable in Canberra and locating a waste plant close to this area, near the central focal point of the City Lake Burley Griffin doesn't make sense.
- Was the location chosen because Narrabundah has Canberra's largest proportion of public housing?
- Even if toxic emissions, including dioxin-like compounds and carcinogenic substances emitted are less than older generations of incinerators, who would want to be located near such a facility? Surely a first sensible precautionary measure is to not locate it next to Canberra's southern population.
- What would the extra costs of the proposal be if the facility were constructed at:
    - Williamsdale ACT?
    - Tarago NSW?
- Because of waste from NSW, should the analysis be conducted from the perspective of the ACT alone, or from an ACT-NSW perspective? If both, are there better sites in NSW for locating the facility?

3.2.7 A lack of information on the project to date and the ongoing consultation process

- The panel boards used at the ISCCC community meeting don't contain a clear image of the site. That is not good enough we need to be more honest and provide clear information.
- Other community panels on new infrastructure and proposals in NSW include the community in every step. Why have we not been included in the early stages of planning this project?
- The proposal scoping application is not on the website and we think it should be.
- There is no detailed data on waste composition in the ACT. So we don't know what is going to be burnt. We feel there will be no transparency on that, and so, community involvement is a façade.
- There has not been enough consultation on the proposal. This community meeting [the ISCCC community meeting] is not enough community consultation.
- It is important to keep reminding people about the project to avoid future misinformation.
- Need to keep a good flow of information to the community and keep going with our engagement. [The Foy [proposal] did not do community consultation well and that was their point of failing.
- We the community should have been briefed before the Canberra Times.
- Is Newgate a public relations company?
- It was suggested that CRS have a regular business newsletter or bulletin to advise businesses of progress of the facility.
- Do you anticipate emissions to be a strong community issue on this project?
- Is there a time limit on community consultations for the new proposal, or will it continue during the approval, construction and operating periods?
- Why was there no Territory or Federal Environmental Agency representation at ISCCC community meeting?
- Can you address our environmental science classes later this year as part of the EIS process?

- The Proposal currently lacks important detail.
- Concern that residents don't know what is going to be burnt. Feel there will be no transparency on information regarding materials being burnt.
- There is no accurate data on waste composition in the ACT.
- There is no emissions comparison to modern coal plant emissions?
- More information needed for the difficulty of dealing with highly corrosive hot gases.
- When will we get more detailed information?
- When will we get a detailed proposal on the project?

3.2.8 Questions as to whether this proposal represents industry best practice

- When things break down - What happens?
- How advanced is the technology?
- Does the ACT Environmental Protection Agency have the necessary statutory independence, authority, powers, knowledges and resources to adequately monitor the facilities for odour, smoke, dust, noise, particulates, greenhouse gases, other gases (eg H2S, SO2, NOx), arsenic, chromium, mercury, and other heavy metals, toxic and acid residues in the ash, and compliance with all other agreed performance criteria? Can it provide adequate and reliable baseline data so that we can know how the waste facility has added to these pollutants?
- Will the EPA have the power to shut down the facility if it thinks that any one of the agreed emission standards for the facility is breached?
- What is the maximum amount of paper, cardboard and other flammable materials that are to be stored at the facility before incineration?
- What happens if there is a fire at the facility? What is the worst case in terms of toxic emissions?
- How long have Waste to Energy European facilities been operating for?
- What are the details of the regulations and standards for this technology?
- I know that the real catch to this project is the difficulty of dealing with highly corrosive hot gases. I am not aware of any steels that can handle corrosive gases at temperatures of 500–800 C. Whether you are planning a steam plant or a gas turbine plant, lifetime & safety of the system will be a critical problem. Your blurb doesn't deal with that serious problem, nor does it give references.
- Will the proposal EIS include a risk assessment, including potential risks of management and operation.
- You can't burn concrete and dirt, so what will happen to these in the process?
- What if there is a facility malfunction or the efficiency of the facility declines over time?
- Emissions modelling would require assessment not only of the potential effect on the food markets in Fyshwick, backyard gardens in Queanbeyan and the likely effect on residents in Tuggeranong and Weston Creek who are subject to temperature inversion effects.

3.2.9 The approvals process and future governance of the facility

- How can you develop your proposal without relevant emissions and environmental standards not yet approved by the EPA or by the ACT Government?
- Has this proposal been agreed to by the ACT Government or the EPA?

- NSW guidelines state methodological data for the proposal approval process is to be gathered for a year. Has this been done?
- New legislation is not yet prepared and should be.
- What are the legislative contents relating to the new facility and its approval requirements?
- Will an independent inspector have the power to shut down the facility if it is considered that any required standards have been breached?
- If an independent monitoring body is the ACT Environment Protection Authority, would they have adequate independence in their reporting, given that it is part of the Chief Minister, Treasury and Economic Development portfolio. Is there a conflict of interest?
- Given that the proposal would introduce a range of new challenges well beyond anything that the existing EPA has to deal with, would the EPA have adequate staff, resources, skills and knowledge to design an appropriate air quality monitoring program, let alone administer such a program?
- Given these challenges, should the Government consider outsourcing the monitoring program, either to the EPA of a larger state with the appropriate resources and skills, such as NSW or Victoria, or a commercial third party, eg CSIRO, a University or consortium of universities, or some company or consortium of companies that specialises in supplying such services (to mining companies, for instance)?
- What will be in place to observe and record longer term general impacts on the population? (something along the lines of the Governments longitudinal study of residents in Mr Fluffy houses might be desirable)?
- Does this proposal contravene our role as a signatory of the Stockholm convention concerning dioxin and furan reduction?
- It feels to me as though the promotion of waste to energy industry in Australia is related to the current federal ''Industrial Chemicals Bill 2017'' which replaces much of our industrial chemicals regulation with ''self-regulation''. Is this the case?
- Unlike NSW, the ACT does not have a formal policy on standards for waste incineration. So, it is unclear what criteria the government can use to make a decision on the incinerator proposal.

3.2.10 Disposal of remaining residue from the waste and energy facility

- Concern the residual will still contain dioxins, and will still be toxic in landfill.
- What are the potential environmental impacts of the disposal of plant residues?
- What are your plans in terms of storage, particularly for the residue?
- Concern we will be mining land in 100 years to recover plastics, and the proposal removes that opportunity.

3.2.11 The reputation of Benedict Industries and mentions of Four Corners program relating to recycling industry

- Benedict Industries was mentioned on the ABC Four Corners program in August 2017 about recycling, are they a dodgy operator?
- CRS is partnering with ActewAGL Retail, and Benedict Industries, a recycling company based in Sydney. They were mentioned on the ABC Four Corners program on moving waste around illegally.
- The recent Four Corners episode about the recycling industry raises further concerns about this proposal including its environmental and social value and the links between dubious private enterprises and government in the recycling industry.

3.2.12 Zoning of the site and permissible uses

- The proposal application does not acknowledge the site is an incinerator and the current zoning on the site does not permit this kind of activity. What is going on here?
- Does the proposal meet the site zoning requirements?
- ''Special consideration'' is required to change the purpose of the lease to an incineration facility, an IZ2-prohibited development. This is a "noxious industry" being proposed for a "light industrial" zoned area. Will you be seeking special zoning permission to go ahead with the proposal?

3.2.13 Visual and noise impacts

- The existing Access Recycling site looks like it is stockpiling glass and looks very messy. Is this an indication of what the new site will look like?
- How high will the stack be on the new facility?
- Will there need to be a high voltage line close to the facility to distribute the power generated?

3.2.14 Odour impact and management

- This is believed to be the first incinerator to burn human sewage sludge in Australia. How can the proponent guarantee that the facility will not emit obnoxious odours detectable by surrounding lessees and as far as the Fyshwick markets and Kingston Railway station?
- How will you control the smell in summer of stockpiled waste, prior to its incineration?
- Will trucks be leaving the facility with waste on board? Will it smell?

3.2.15 Freight rail component comments

- What will be the proposed Frequency of rail movements at the new facility when operational? Will the rail component be assessed in the EIS?
- What will be the noise from the freight rail?

3.2.16 Project carbon footprint

- The comment was made that New Scientist Magazine 22 July 2017 stated that waste to energy incinerators create a carbon footprint larger than most coal-fired power stations (reference article detail not supplied).

3.3 Considerations of the issues raised

3.3.1 Changes to the proposal

Based on feedback from the community and stakeholder consultation to date, changes have been made to the proposal. The three key changes to the proposal were:

- Separating the proposal into two distinct components of recycling/freight rail transport and renewable energy;
- Proposing a geographic limit to waste sources, to be within 100 km of the facility; and
- Reducing by half the proposed volume of renewable energy to be produced.

Capital Recycling Solutions and ActewAGL Retail recognise through the community issues raised that more research and time is required to work through the consultation process for the renewable energy component of the proposal.

As a result, the renewable energy application to the ACT Government will occur in 2018.

The footprint for the renewable energy proposal is identified in this MRF Draft Environmental Impact Statement, however the detailed considerations of this process are the subject of the draft EIS in 2018.

4. FUTURE COMMUNITY AND STAKEHOLDER ENGAGEMENT

4.1 Proposed engagement during the Draft MRF EIS display

The Draft Environmental Impact Statement will be placed on public display. During the display period, the public is invited to review the EIS and send submissions to the Department of Planning.

Information about the EIS display will be communicated to stakeholders and the community using email, letters, advertisements, media releases and the CRS website. The EIS will be available on the Department of Planning website at:

- http://www.planning.act.gov.au/

And more information will be posted at:

- https://capitalrecyclingsolutions.com.au/

Stakeholder meetings are planned to further discuss the proposal and study results with interested groups.

4.2 Submissions assessment

At the completion of the display period, the Director General of the Department of Planning will provide CRS with a copy of the submissions so that issues can be considered and addressed. Any submissions received by CRS will be dealt with in accordance with the Environmental Planning and Assessment Regulations 2000.

All submissions made to the Department of Planning during the public display period will be posted on the department's website. The privacy of submitters is protected by removing names from submissions at the submitter's request.

4.3 Commitments to ongoing community and stakeholder consultation

If approved, consultation will continue throughout the detailed design, construction and operational phases of the project.

A community and stakeholder engagement plan would be developed and implemented to appropriately reflect community information needs and any disclosure requirements of the ACT Government.

Consultation activities and tools during this period would include:

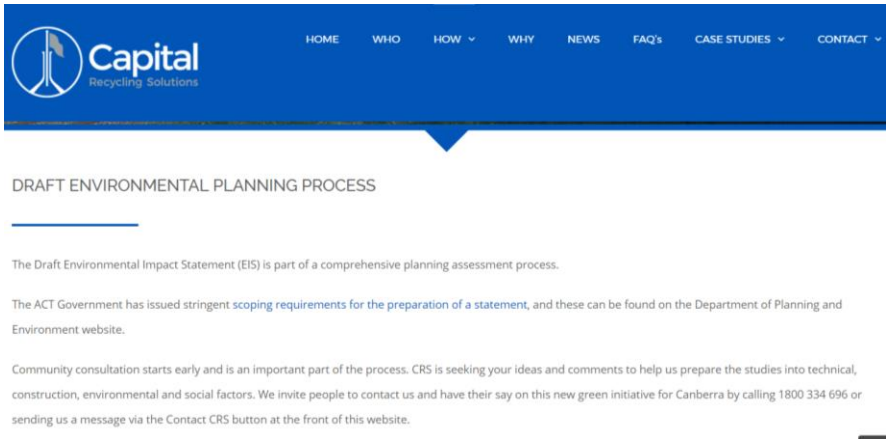
- Notification of construction work dates and times;
- Notification of changing traffic and access conditions around the facility site;
- A 1800 community information telephone line and email address;
- Ongoing community information sessions or educational open days as required;
- Website updates including data on recycling alternatives;
- Newsletters; and
- Advertising in local and regional media when / as required.

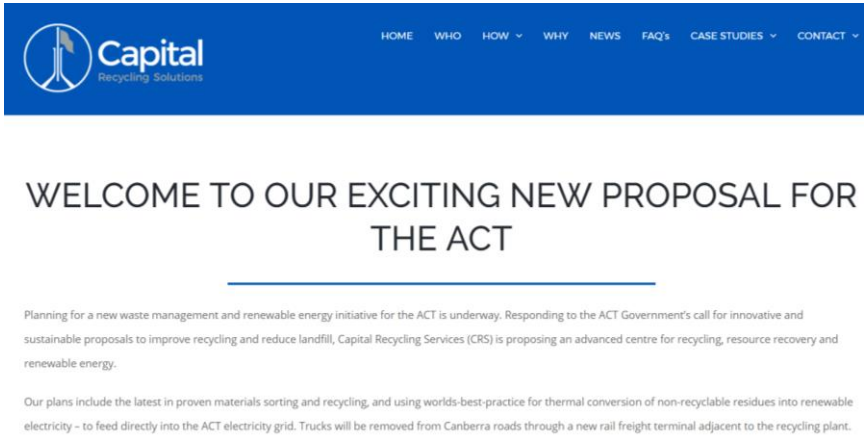
The proposal would have an important educational role for the community, and CRS plans to work with schools and universities to ensure that the centre contributes to regional waste management awareness and knowledge building.

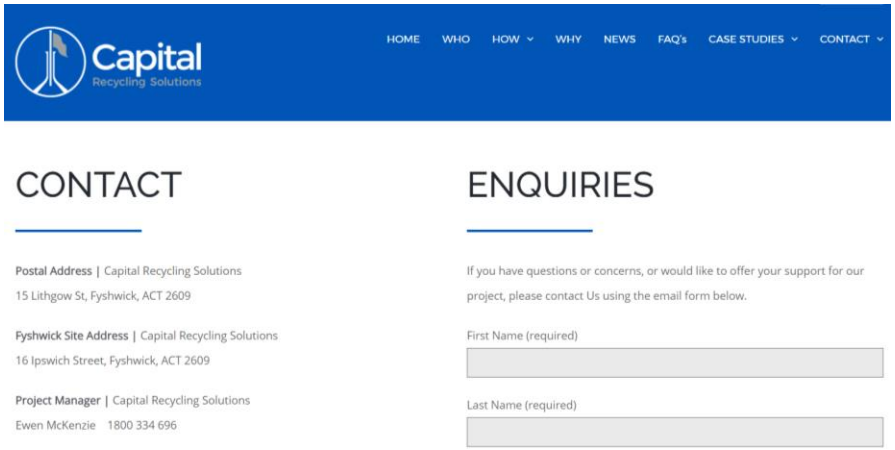
APPENDICES

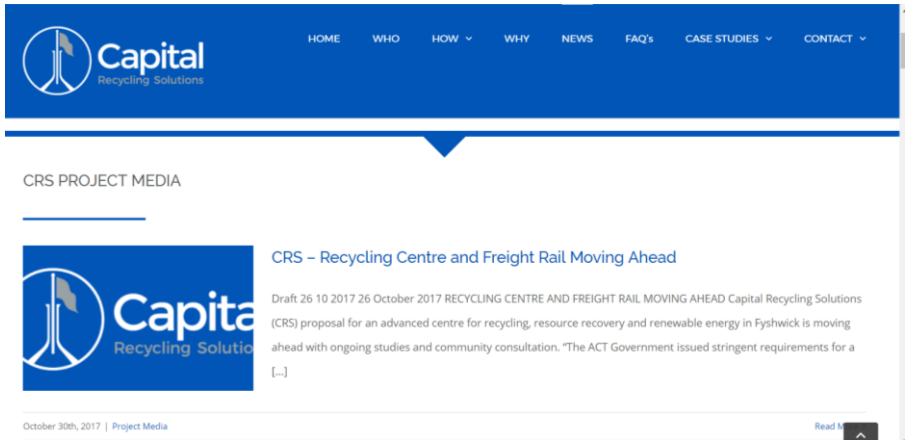
APPENDIX A: CAPITAL RECYCLING SOLUTIONS WEBSITE

Sample of pages from the Capital Recycling Solutions website from October 2017.

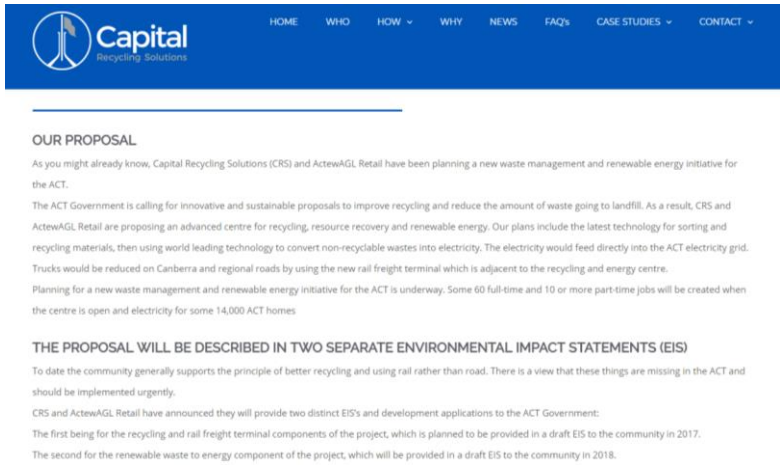


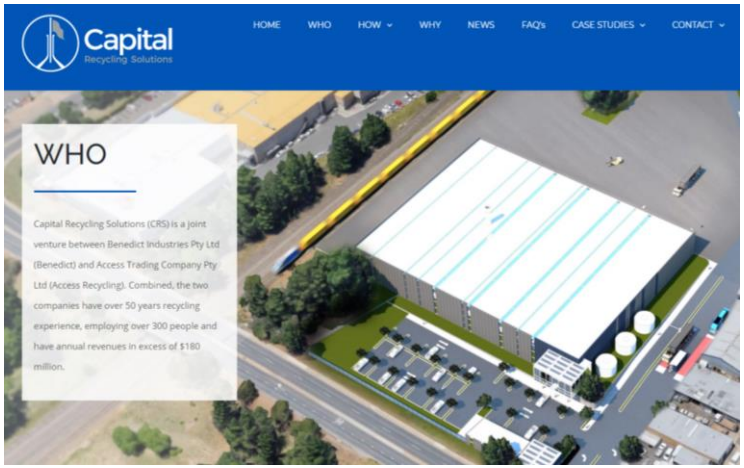


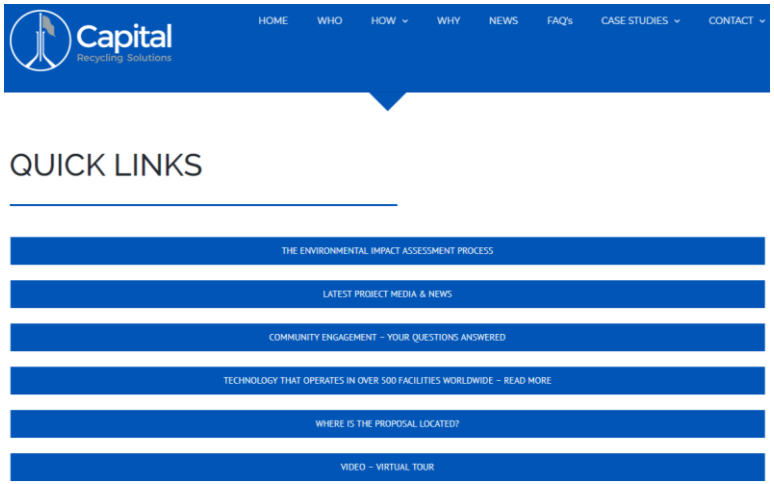




Sample of pages from the Capital Recycling Solutions website from November 2017.






Capital
Recycling Solutions
HOME
WHO
HOW
WHY
NEWS
FAQ's
CASE STUDIES
CONTACT
QUICK LINKS
THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS
LATEST PROJECT MEDIA & NEWS
COMMUNITY ENGAGEMENT – YOUR QUESTIONS ANSWERED
TECHNOLOGY THAT OPERATES IN OVER 500 FACILITIES WORLDWIDE – READ MORE
WHERE IS THE PROPOSAL LOCATED?
VIDEO – VIRTUAL TOUR


Capital
Recycling Solutions
HOME
WHO
HOW
WHY
NEWS
FAQ's
CASE STUDIES
CONTACT
WHY
The ACT has one of the highest per capita waste generation rates in Australia. With a growing population we need green solutions.
Worldwide, this issue has been intensely scrutinised, particularly over the last 15 years where the total environmental outcome is now being considered. The resulting CRS proposal has benefits for the environment, the community and the economy.
The CRS solution will achieve all four outcomes of the ACT Waste Management Strategy (outlined below). This is by using a sophisticated and proven level of recycling, and waste processing technologies that work in combination to achieve an outcome of 90% of waste

APPENDIX B: LETTERBOX AND DOORKNOCK LOCATIONS

Doorknocked businesses and residences in Wiluna St and East Lithgow St – next to site area August 2017and Letterbox dropped in October 2017

Doorknocked Businesses and residents in Narrabundah in August 2017

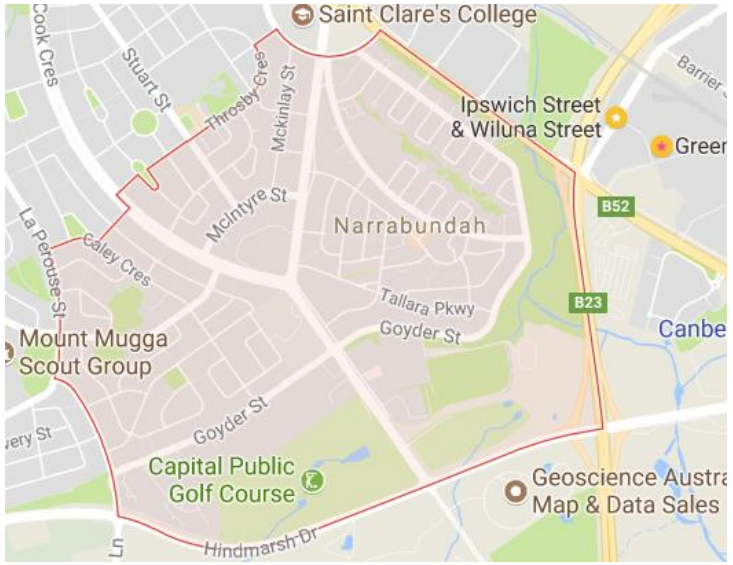
Letterbox dropped same locations in November 2017

Fyshwick Fresh Food market stallholders doorknocked: August and November 2017

Letterbox drop to Narrabundah residences: August and October 2017

Letterbox drop to The Causeway and Kingston Foreshores residences: August and October 2017

Letterbox drop to residences at Southside Village in August and October 2017



Letterbox drop: Suburb of Narrabundah – August and October 2017

Industrial area behind site at Fyshwick: letterbox drop August and October 2017

APPENDIX C: CRS / ACTEWAGL RETAIL SAMPLE PRESENTATION SLIDES FROM PUBLIC MEETING

COMPREHENSIVE SOLUTION

- ADVANCED RECYCLING AND SORTING
- SMART REUSE
- RENEWABLE ENERGY
- FREIGHT RAIL LINK

recycle
The possibilities are endless.

LOCATION – OLD SHELL SITE, FYSHWICK

ENERGY FOR MORE THAN 28,000 HOMES IN THE ACT

RENEWABLE, LOW CARBON, LOCAL, CONTINUOUS AND RELIABLE POWER

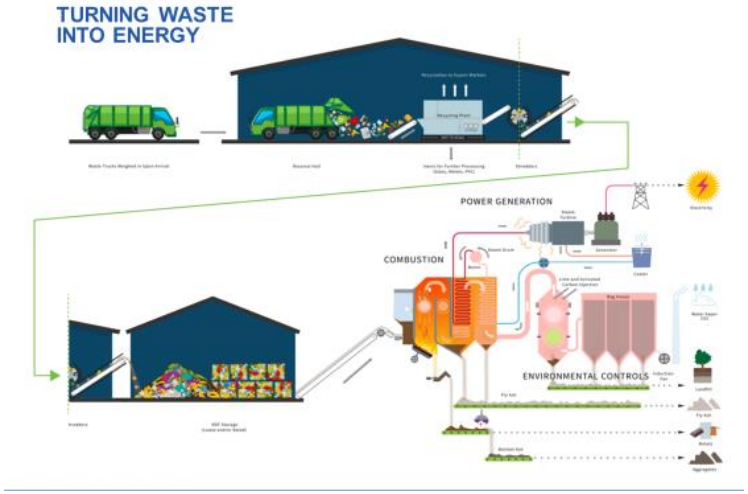
- Up to 30 megawatts of power a year providing the ACT with baseload renewable energy – supplying one fifth of homes
- Provided in partnership with ActewAGL Retail. ActewAGL are a Joint Venture Partner in owning and operating the waste-to-energy facility – connecting the plant to the network and providing critical infrastructure support
- Provides additional energy security for ACT – currently imports majority of power supply

ActewAGL

HI-TECH RECYCLING AND SORTING

RED TOP BINS FROM HOUSEHOLDS AND COMMERCIAL WASTE WILL BE DIVERTED FROM ACT LANDFILL

- Recycling and sorting is a major element of our comprehensive centre
- Glass, wood, plastic, bricks, metals, concrete, cardboard, paper and some plastics will be sorted and recycled – these are valuable commodities
- We will aim to reduce Municipal Solid Waste and Commercial and Industrial Waste streams to landfill by **more than 90 per cent**


TURNING WASTE
INTO ENERGY
POWER GENERATION
COMBUSTION
ENVIRONMENTAL CONTROLS


SMART REUSE
ASH RECOVERED FROM THERMAL CONVERSION CAN BE REUSED AS ROAD BASE
CAPITAL RECYCLING SOLUTIONS 15

PARTNERSHIP WITH EXPERTISE

CAPITAL RECYCLING SOLUTIONS

- Joint venture between Benedict Industries & Access Recycling
- More than 50 years' recycling experience, employing more than 300 people and have annual revenues in excess of $180 million
- CRS is responsible for development including the Draft EIS and community engagement, as well as construction and operations
- Project site is owned by CRS

JOINT VENTURE WITH AGL

- CRS has established a joint venture with ActewAGL Retail for the establishment of a Waste to Energy facility
- ActewAGL Retail is the leading electricity and natural gas retailer in the ACT and south-east NSW – more than 180,000 customers and is one of the largest employers in the ACT with over 800 staff
- ActewAGL's role will be to connect the renewable energy plant to the grid

DRAFT EIS PROCESS HAS BEGUN

- Draft EIS process is under way – full range of technical studies to be completed including traffic, air quality, noise, odour, health and social impacts
- Targeting the end of 2017 for Draft EIS to go on display
- Community engagement under way in Fyshwick, Narrabundah and Symonston areas
- Keen to hear from all stakeholders

APPENDIX D: ISCCC MEETING 24 AUGUST 2017, QUESTIONS ASKED BY THE ISCCC, COMMUNITY HANDOUT

The following is the information provided to meeting participants in September 2017.

Your interest in our proposal responding to the ACT Government's call for innovative waste management solutions is welcomed and we thank you for the questions.

Capital Recycling Solutions (CRS) is committed to transparency and ongoing engagement with all Canberrans about the proposal. As such we have provided answers to all the questions below. We would be pleased to talk about any of these issues and any that come up along the way as we are at the early stages in the planning process.

Currently, we are focussed on providing initial community information and talking with different people about the proposal. CRS is engaging specialist consultants to prepare all the technical studies in accordance with the ACT Government's Scoping Requirements. Your questions will inform our studies and we are committed to continuing the discussion throughout the study process. There will be further opportunities for discussion when the Draft Environmental Impact Statement (Draft EIS) is ready to go on public display in late 2017. Working together in this way means we can make sure all your questions are answered and the issues you raise are directly addressed.

Thank you again for your questions and please feel free to get in contact with us if you have anything further on 1800 334 696.

1. **What is the smallest estimate of truck movements needed to service the facility, including both deliveries of waste and sewage sludge, and removal of ash and recyclables?**

Measuring truck movements will be determined in a key study to be completed in the Draft EIS. (Please note we have not confirmed that sludge will be part of the project and our primary focus is on transportation of household waste (red bins)/ municipal solid waste (MSW) and commercial and industrial waste (C&I) currently going to landfill in the ACT.)

An independent traffic specialist has been engaged to investigate and report on traffic impacts. Our investigations will confirm volumes and assumptions. At the moment over 300,000 tonnes of waste goes directly to the Mugga landfill annually and it is transported by a number of different contractors. Some would travel to the CRS recycling and renewable energy centre, some would not. Yellow recycling bins, for example, will continue to go to Mugga Lane.

The general public and other vehicles taking recyclables and green waste to Mugga Lane, Mitchell or West Belconnen would not visit the proposed CRS centre. The trucks taking the red bin waste residues from the transfer stations to Mugga Lane would divert to the CRS centre – to increase recycling, resource recovery and generate electricity. The general public would be encouraged to use the existing drop-off arrangements at Mugga Lane, Mitchell and West Belconnen.

2. **What is the largest estimate of such truck movements, assuming no supplier chooses to deliver or remove material by rail?**

In addition to our response on Question 1, CRS would be responsible for exporting the recyclables and then the recovered resources from the centre. A rail line runs through the site, and thus we expect a large proportion of this would be done by rail as the re-use markets are outside the Canberra region.

The commodities market for recyclables is largely outside of Australia, with the exception of cardboard and paper recycling within Australia.

Recyclables would be compressed, baled and containerised for export or shipment. The use of rail, once the infrastructure is established, is far more efficient and at lower costs than road. We have a very strong incentive and commitment to rail transport; its rejuvenation has the support of the NSW Government and initial discussions with the Canberra business community about its economic importance have been very positive.

The scoping requirements document from the ACT Planning Department asks for compliance with the European Emissions Directive 2010/75/EU, which is the strictest standard in the world. It can be found at http://ec.europa.eu/environment/waste/framework/energy.htm. CRS proposes to import proven technology from elsewhere in the world that complies with this strict standard.

The ACT EPA already has a range of emissions regulations and the *Draft Separation Distance Guidelines for Air Emissions* 2014. Whether the ACT Government decides to adopt separate legislation is a matter for the ACT Government.

3. **Will there be a fully independent body charged with monitoring the facilities for odour, smoke, dust, noise, particulates, greenhouse gases, other gases (eg H_2S, SO_2), arsenic, chromium, dioxin, furans, heavy metal residue in the ash, acid residues in the ash, and compliance with all other agreed performance criteria?**

These decisions are made by the ACT Government and CRS would readily comply with all ACT requirements.

4. **Who will meet the costs of monitoring and ensuring compliance – the proponent, or the ACT taxpayer?**

Traditionally the costs of both monitoring and compliance are met by a combination of the proponent (CRS) and the relevant regulatory authority. This needs to be further confirmed with the relevant regulatory authority.

Our recycling, resource recovery and renewable energy centre proposal includes continuous, publicly available air quality monitoring data. The data would be streamed live on a website and validated. This provides transparency about air quality.

5. **Can you give a rough estimate of the compliance budget and some insight as to how this was derived – e.g. number of employees, number of monitoring stations, frequency of sampling, costs of analysis, and the timeframes between sampling and response.**

CRS would be required to meet a range of compliance conditions. Until we know these, it is difficult at this stage to program the monitoring and what this will cost.

We agree monitoring will be required and is essential. Real-time monitoring systems will be employed and the data made available to the public with a live streaming website, similar to established facilities around the world. The data will be described against all goals and limits, to help the community understand compliance. Historical data will also be accessible.

By “monitoring stations” and “frequency of sampling” we assume the question means ground level air monitoring stations. Our emissions consultant (Todoroski Air Sciences) will certainly consider this question and provide advice.
This would depend in part on the predicted emission levels.

The project budgets that we would develop would take into account the conditions of any consent, and the assessments and monitoring needed to achieve compliance.

6. **How often will compliance tests be carried out on emissions, and will results be published in real time? Or will compliance be based on averages over time so that excessive levels are masked by inclusion of lower levels during times of lower incineration?**

As discussed above, CRS would supply these details once the compliance requirements are prepared and finalised. We don't know yet what data will be required and when.

We do undertake to provide emissions data, continuously, in real time. CRS is committed to working with the community to understand any scientific method or process involved in documenting compliance. We have yet to see the data formats that will be specified.

7. **Will an independent inspector have the power to shut down the facility if it is considered that any one of these standards has been breached?**

The CRS centre must and will adhere to its regulations and operating licenses. If its operating license was breached it would be a serious matter for CRS and the regulators. CRS would always work cooperatively with regulators.

The benefit of the renewable energy centre proposal is that we can see everything – all data, incoming and outgoing materials. The site is fully transparent and observable. And we can make decisions quickly. This is a significant difference to landfill and allows, in our view, best possible environmental management.

8. **If the independent monitor is to be the ACT Environment Protection Authority, would this body have adequate independence, given that it is part of the Chief Minister, Treasury and Economic Development portfolio?**

This is a matter for the ACT Government. It is our understanding that, to ensure fairness and independence, decisions made by the Environment Protection Authority under the *Environment Protection Act 1997* may be reviewed both internally and by the ACT Civil and Administrative Appeals Tribunal.

9. **Given that the proposal would introduce a range of new challenges well beyond anything that the existing EPA has [had] to deal with, would the EPA have adequate staff, resources, skills and knowledge to design an appropriate monitoring program, let alone administer such a program?**

Similar to question 9, this is a matter for the ACT Government to determine. We envisage the ACT Government will draw upon decades of experience in regard to these types of facilities overseas.

10. **Given these challenges, should the Government consider outsourcing the monitoring program, either to the EPA of a larger state with the appropriate resources and skills, such as NSW or Victoria, or a commercial third party, eg CSIRO, a University or consortium of universities, or some company or consortium of companies that specialises in supplying such services (to mining companies, for instance)?**

Similar to question 9, this is a matter for the ACT Government to determine.

11. **What monitoring will be in place to monitor longer term impacts on the population (something along the lines of the Government's longitudinal study of residents in Mr Fluffy houses might be desirable)?**

Conditions will be set by ACT Government and we will comply with them.

12. **This is believed to be the first incinerator to burn human sewage sludge in Australia. How can the proponent guarantee that the facility will not emit obnoxious odours detectable by surrounding lessees and possibly as far as the Fyshwick markets and Kingston Railway station?**

It is important to make it clear that CRS has proposed a recycling, resource recovery and renewable energy plant, not an "incinerator". Its primary output is recyclable materials and electricity generation to 28,000 Canberra homes, not residual ash.

The facility would significantly increase the percentage of MSW and C&I waste that is recycled and reused and reduce reliance on the Mugga Lane landfill. Part of the remaining waste that cannot be recycled would be converted to renewable energy. With respect, our project is no more of an incinerator for waste than a car engine is an incinerator for petrol. We propose to take a waste product, that would otherwise be landfilled, remove the commercially recyclable commodities (which ought not be landfilled!) and then properly prepare the residues to become a fuel, and then create electricity all in a controlled and monitored environment.

An incinerator has connotations of volume reduction being the main purpose, or destruction of materials, for example medical waste. It also has connotations of uncontrolled emissions. This proposal does not meet that definition. This is a recycling and reuse and energy production facility, with air scrubbing systems that are extensive and proven. Almost 50% of the infrastructure cost of a modern waste to energy plant is for the emissions capture and air quality management equipment.

It is worth noting that the IPCC, European Environment Agency, Clean Energy Finance Corporation, Clean Energy Council (Australia) and the ACT Government's own consulting advisors (MRA) all recognise that MSW that would otherwise be landfilled, when properly treated in a thermal waste to energy plant, results in net carbon emission reductions and should be considered as a worthwhile carbon emissions abatement strategy.

Regarding sludge, CRS has had preliminary discussions only with Icon Water on the potential for its sludge to be included in the Fyshwick project. As we explain below, we anticipate sludge is unlikely to be a significant feature of our proposal.

Examples of existing incinerators built for destruction purposes (as opposed to electricity generation) are the old Total Care waste incinerator at Mitchell as well as the Icon Water bio-solids incinerator at Lower Molonglo. Icon Water currently processes some 15,000Tpa using their own systems. During the treatment process all of the solid material, called "sewage sludge", is removed and incinerated in a high temperature furnace. The resulting ash (Agri-Ash) is sold to farmers as a soil conditioner" https://www.iconwater.com.au/LMWQCC.

According to information provided in Icon Water's Price Proposal they have plans to upgrade the solids handling process and refurbish the incinerator to ensure they can operate efficiently and continue to meet their EPA Licence requirements.

As Icon Water will be upgrading their incinerators, the only possible role for the CRS centre may be as a backup capacity at low volumes (as the Mugga Lane landfill currently is).

13. **What is the maximum amount of paper, cardboard and other flammable materials that are to be stored at the facility before incineration?**

As is the case with similar established plants, the CRS centre would be operated on a just-in-time basis. This means no significant quantities of material would be stored onsite for any period of time.

There is no commercial incentive, or benefit, or sufficient free space, to store large amounts of recyclables on-site. This means that, allowing for possible operational interruptions, up to 7 days of inventory may be stored.

Appropriate storage conditions would be provided, including the use of odour controlled (reduced air pressure) buildings.

14. What happens if there is a fire at the facility? What is the worst case in terms of toxic emissions?

The risk of fire and fire suppression and control systems will be assessed specifically as part of the Draft EIS. Equipment would be installed on site to ensure the risk of fire is as low as possible. As part of normal industrial planning, any fire should be extinguished within minutes. Our operations are contained inside buildings with established fire management systems.

Our understanding of recent fires in other facilities in the recycling industry (that process yellow bins unlike our proposal) were a result of large volumes of unsorted yellow bin waste stored in outdoor environments - without adequate fire management systems. This proposal will not handle high volumes of plastics as this is not our target waste stream.

Further, due to the imminent NSW container deposit scheme (and hopefully the ACT follows suit), these types of containers may well be greatly and desirably reduced from CRS's target waste streams.

15. What would the extra costs of the proposal be if the facility were constructed at Williamsdale in the ACT [NSW]? Or Tarago in NSW?

The CRS approach, as happens in Europe, is that we should recycle and manage waste near the point of generation, and produce electricity near the point of consumption. This is the most environmentally efficient way of managing waste and electricity.

Fyshwick lies between two zone substations and is ideally located to connect to the ActewAGL Retail electricity network, which would reduce future transmission network augmentation capital expenditure and help provide security of supply to the ACT network.

Similarly, the facility in Fyshwick would result in avoided electricity transmission losses. Power is typically lost in transmission over distance.

Removing the facility from Canberra would create significant inefficiencies. As the waste needs to be transported this will require extra collection trucks, diesel and road wear. The further away the facility, the more trucks needed as they will lose time every day travelling to and from the facility - as well as extra diesel use and emissions and extra road wear.

In addition, the CRS centre would use well developed but underutilised freight rail infrastructure to export recyclables. Again, the focus is on efficient total environmental outcomes.

16. What is the price per kWh that CRS expects to receive from its sale of electricity to ActewAGL Retail? If this is more than the feed in tariff offered to private citizens, is CRS not being subsidised by the ACT Government?

The price for the electricity offtake is unknown at this stage. The offtake will either be sold to ActewAGL Retail under a power purchase agreement (PPA) or subject to a feed in tariff (FIT). If under a PPA, the price will be determined against relative market comparable pricing for renewable energy loads. If under a FIT, the price will be evaluated by the ACT Government. As indicated in the Market Sounding Document issued by the ACT Government: "*To build and Operate or Provide New Waste Services, a FIT may be offered for the renewable portion of any energy generated from waste. It would likely be set at a rate between the prices previously awarded in the Territory's large scale renewable energy auctions, i.e. $79-$186/MWhr*". At present we believe the price for the energy generated from the facility would be within that range.

17. What does CRS expect to be paid to receive NSW waste and NSW sewage sludge?

Please refer to question 13 regarding sewage sludge. We have only had preliminary discussions with Icon Water in relation to ACT's sewage sludge scenarios. We have not considered any other sewage sludge from outside the ACT.

18. What does CRS expect to be paid to receive ACT waste and ACT sewage sludge?

CRS is not targeting sewage sludge as part of this proposal. The intake cost for waste coming from the ACT has not yet been confirmed. However, the intake cost for waste is expected to be within the range of the prevailing Mugga Lane landfill gate fee at the time and any proposed ACT Waste Levy.

19. Would the establishment of this facility threaten the establishment of a similar facility in NSW?

This CRS centre would be designed to have capacity for the ACT and the surrounding region's waste. There is some provision in the design of the centre for growth, should the ACT's population and corresponding waste generation continue to grow. These types of facilities are a function of population, waste management policy and other factors.

We do not believe the proposal would have any negative impact on a similar proposal in NSW and note that countries such as Switzerland have over 30 of these types of facilities in operation.

20. What would be the annual saving to the ACT Government of any estimated reduction in landfill?

CRS does not have this information about the ACT Government budget and current income from waste. This needs to be sought directly from the Government.

We wish to add that such an assessment should include the ongoing costs to maintain the landfill even beyond its closure, including environmental costs that cannot be mitigated (for example methane and leachate).

In terms of waste tonnage generated in 2014 – 2015, *The ACT Waste Feasibility Study* (ongoing) found:

i. Total waste generation – 1,042,089 tonnes
ii. Per capita annual waste generation – 2.67 tonnes (highest of all States and Territories – Tasmania is 1.2 tonnes)
iii. Per capita annual domestic Kerbside general waste generation (not including 'yellow lid bin') – 184kg
iv. Estimated annual amount of organic waste to landfill – 50,000 tonnes
v. Estimated annual greenhouse gas emissions from landfill – 70,600 tonnes Co2 (1.8% of ACT total emissions)
vi. The whole-of-life cost per household is between $140 and $150 per annum. This includes the current NOWaste contracts, management costs, capital and remediation costs of waste to landfill and is net of revenue from gate fees.

21. What are the current ambient levels of odour, smoke, dust, noise, particulates, greenhouse gases, other gases (eg H_2S, SO_2), arsenic, chromium, dioxin, and furans at Hume, Fyshwick, Manuka, and Civic, and how are these levels expected to change at each of the localities specified following the establishment of the proposed Waste Incinerator in Fyshwick?

We are at the beginning of the planning process and have recently commissioned environmental studies as part of preparing the EIS and this includes air studies. The EIS Scoping Requirement is set out by the ACT Government, and this lists the things that the studies must address.

The link to the scoping document is http://www.legislation.act.gov.au/ni/2017-389/default.asp

Baseline air quality findings will be part of the air quality analysis and will be provided in the Draft EIS.

A good example is in Vancouver where they monitor their 25MWe waste to energy plant (which was commissioned back in 1988). There has been no measured effect on the nearby surrounding areas.

It should also be noted that the renewable energy generated from the facility will offset carbon dioxide/emissions from other high carbon content fossil fuels found in power generated in the National Electricity Market (NEM).

22. **How does the projected level of various pollutants following the establishment of the proposed Fyshwick Waste Incinerator compare with the current level of pollutants attributable to wood burning for domestic heating?**

The EIS will include a comprehensive emissions analysis and health impact assessment. The link to the scoping document is here http://www.legislation.act.gov.au/ni/2017-389/default.asp

We agree and intend to describe such comparisons with background emissions levels and to establish the sources of emissions. Independent scientific advice and examples from similar plants operating in urban areas around the world will be documented to demonstrate our early conclusions that the proposal would not result in adverse health impacts for Canberra residents.

We note that domestic wood burning is a considerable source of pollution, especially dioxins and furans.

23. **Would any new limits on various pollutants introduced as a result of the proposed Fyshwick Waste Incinerator apply to pollutants already present due to current activities such as wood burning for heating?**

The emissions from the centre would be monitored and regulated as described above.

This is considered separately to the regulation of other sites and facilities, for example, wood burning for home heating. New regulation is a matter for the ACT Government.

24. **How would projected truck movements to and from the proposed Fyshwick Waste Incinerator compare with existing truck traffic to the Mugga Lane tip and any other waste disposal site in Canberra (please specify the location of any such).**

As outlined in question 1, the expected truck movements would be similar to those currently going to the Mugga Lane Tip face with waste for the landfill but excluding trucks going to Mugga Lane with recyclables and green waste. This proposal is to divert tip-face trucks from the landfill to the recycling and renewable energy centre, but not divert green waste, yellow bin or hazardous wastes away from Mugga Lane.

In addition, CRS is presently talking with some large volume road freight users interested in using the new rail access at the site, the results of which would reduce overall truck numbers in the region.

Measuring truck movements in an important part of the work we have to do for the EIS. An independent traffic specialist (AECOM) has recently been engaged to investigate and report on traffic impacts. Our commitment is to keep the community informed about all transport proposals.

25. **Would the establishment of the proposed Fyshwick Waste Incinerator increase or decrease truck traffic through inner south Canberra, and by how much?**

Please see questions 1 and 25. The proposal for a recycling, resource recovery and renewable energy centre would divert many of the trucks from Mugga Lane to Fyshwick. Details of the traffic impact will be provided for community comment in the traffic study section of the draft EIS.

26. **Are there any recent baseline studies of the composition of Canberra's Municipal Solid Waste (MSW), Commercial and Industrial waste (C&I waste) and light residues from Construction and Demolition waste (C & D waste) (cardboard and other packaging, timber and plasterboard offcuts).**

Yes, a great deal of detailed analysis is available on this subject. It has been collected by *the ACT Waste Feasibility Study* (ongoing). CRS has been an active participant in the Study's Commercial Reference Group since its inception in 2015. Please see: https://www.tccs.act.gov.au/recycling-and-waste/act-waste-feasibility-study/about

CRS has access to detailed data of all waste streams within the ACT. We can provide that information or it can be obtained from the ACT Waste Feasibility Study.

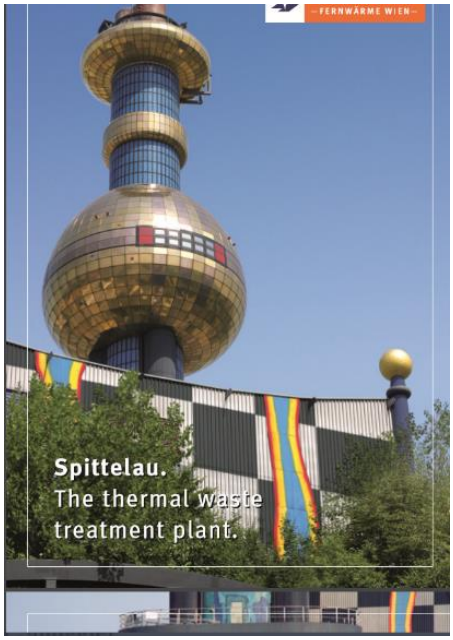
The recent ACT Government Market Sounding on Waste provided tenderers with data of various types to assist in making assumptions. We can make this available to you.

27. **How is the introduction of container deposit legislation expected to influence the composition of MSW and C&I waste?**

We would expect the percentage of containers would reduce by 80% from existing red bin waste streams. This is based on the SA experience and NSW forecasts. We all agree this would be a great outcome for the ACT. See: http://www.epa.nsw.gov.au/waste/container-deposit-scheme.htm The NSW Container Deposit Scheme organisers estimate that some 80% of manufactured containers will be returned to a coordinator for resale.

28. **Can you name similar waste incineration facilities overseas with much the same nameplate capacity located within an urban area?**

Yes, there are hundreds of similar established and proven centres overseas.



There are three similar centres within 2km of the Eiffel Tower in Paris. There are three in the heart of London. Other centres, of varying size, are listed below.

vii. Vancouver has operated since 1988, recycling metal and producing electricity for 16,000 homes http://www.metrovancouver.org/services/solid-waste/about/wte/pages/04.aspx

viii. Vienna has a thermal waste treatment plant. The designers paid great attention to the aesthetic look of the centre (shown here).

ix. https://www.wienenergie.at/media/files/2014/brosch%C3%BCre_spittelau_12772.pdf

x. Paris – a link to a presentation from 2015 is attached here. Some 50% of Paris District Heating network demand is supplied by three waste-to-energy plants: http://www.lsta.lt/files/events/2015-04-27_28_EHP%20kongresas/33_Hubert_DE-CHEFDEBIEN.pdf

xi. London has the view this is green energy. A link to London Waste website is here.

xii. http://www.londonwaste.co.uk/waste-to-energy/

xiii. In Italy, a group called a2a is described. They publish a weekly report containing daily emissions data for our waste-to-energy plants and for a number of thermoelectric plants.

xiv. https://www.a2a.eu/it/gruppo/i-nostri-impianti/termoutilizzatori/brescia

xv. To see a map of various facilities across Europe in 2014, please open this link http://www.cewep.eu/information/data/studies/m_1488

xvi. It is recommended you take a look at other energy centres on http://www.cewep.eu/

29. How do the feedstock profiles of these [overseas] facilities compare with those of Canberra's mix of MSW, C&I and C&D waste?

This is a good question. Our proposal is not to receive large volumes of waste from the Construction and Demolition (C&D) waste sector. As part of our recycling proposition CRS would process a light fraction from the C&D waste streams for recyclables - which is currently landfilled. This very recyclable waste stream is already catered for in the ACT, with recycling rates presently exceeding 80%.

The target waste stream for the CRS centre is waste from kerbside (red lid bin) collection and C&I waste bin collection. The Municipal Solid Waste (MSW) feedstock is essentially this. The municipal waste stream is not expected to vary significantly between various European cities and Canberra. Finally, the waste would first pass through a recycling plant and only the residues become fuel for the waste-to-energy component.

30. **How do you propose to totally exclude plasterboard (mainly composed of Calcium Sulphate and incinerates to Sulphur Dioxide) from the incinerator and how will this impact on the viability of the proposal?**

We expect that at least 90% of our waste stream is non-construction waste where there is little gyprock. Sophisticated sorting technology that is part of this proposal includes automated and manual systems to capture almost all recyclable items from the incoming waste streams, including plasterboard, bricks, glass, ceramics etc. Not only are these things of no thermal value in the waste-to-energy process but they create increased levels of ash if they are not removed, so it is in CRS' interest to exclude them from the fuel.

Further, many of these resources have value as recycled products, such as agricultural gypsum in the case of plasterboard, which is important to CRS. CRS partners have recycled thousands of tonnes of waste plasterboard into agricultural gypsum over the past 15 years. We continue to have relationships with leading plasterboard recycler, Regyp. For more information see: www.regyp.com.au/

Finally, the facility's emissions capturing system would remove Sulphur Dioxide from the flue gas to levels that are below the world's strictest standards.

Thank you for your questions and we are happy to provide more information.

The design proposal, as we work through these issues raised above, will be made available for public comment in the Draft EIS and our commitment is to reach out to all interested residents and businesses to provide information.

Ewen McKenzie, CRS Project Manager

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APPENDIX E: INFORMATION BOARDS DISPLAYED AT THE AUGUST 2017 INNER SOUTH CANBERRA COMMUNITY COUNCIL PUBLIC MEETING

Capital Recycling Solutions — COMPREHENSIVE SOLUTION

CRS is proposing to build an advanced recycling, resource recovery and renewable energy centre that supports the local environment

Red bins and industrial bins are diverted from Mugga Lane to the Fyshwick CRS facility for sorting and recovery

Advanced recycling

Recyclables are removed and transported to interstate and overseas markets by a new intermodal rail link

Renewable energy

What cannot be recycled can be turned into energy powering up to 28,000 homes - that's renewable baseload energy for one in five ACT households

Smart reuse

Some material can be reused for construction and road building

Capital Recycling Solutions — CANBERRA NOW

The ACT produces one of the highest rates of rubbish in Australia per capita

- About 309,000 tonnes of rubbish goes to Mugga Lane each year
- Only yellow bins are recycled while red bin household and commercial municipal waste goes to landfill
- Mugga Lane tip is running out of space and expansion is required
- Landfill produces methane more than 20 times more potent as a heat trapping gas than CO_2
- ACT Government is seeking to increase the recycling rate from around 70% to more than 90%
- ACT currently has no local baseload energy supply, creating potential energy security issues as the grid shifts to renewables that provide intermittent supply
- CRS and ActewAGL Retail have responded the ACT Government's call for innovative ideas that will drive improved environmental outcomes

Mugga Lane landfill: All the ACT's household red bins and commercial waste end up here

JOINT VENTURE

Capital Recycling Solutions

CRS comprises Benedict Industries & Access Recycling – more than 50 years' recycling experience, employing more than 300 people and have annual revenues in excess of $180 million

ActewAGL

ActewAGL Retail is the leading electricity and natural gas retailer in the ACT and south-east NSW – more than 195,000 electricity and 145,000 gas customers

HI TECH RECYCLING

CRS will bring the best of global technology to the ACT to maximise the amount of material identified for recycling

Wood, glass, metals, paper, cardboard and other materials are extracted

IDEAL LOCATION

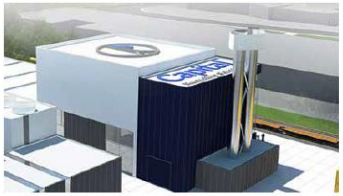
- Adjacent to railway line for freight export
- Close to substations for efficient connection to electricity network
- Appropriate zoning close to waste sources
- Good major road links

ASSESSING IMPACTS

The EIS studies are under way – a range of technical studies to be completed including traffic, air quality, noise, odour, health and social impacts

AIR QUALITY ASSESSMENT

The CRS project will include a substantial investment in leading environmental technology for emissions, which is based on over 25 years' of industry experience globally.
The EIS will include an assessment of any air, dust, emissions and odour impacts on surrounding areas and detail all proposed mitigation, management and monitoring measures.
The assessment will use the NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants and the dispersion modelling will be based on European world's best practice standards.



HEALTH IMPACT ASSESSMENT

The health assessment will analyse any potential positive or negative implications, including social and economic impacts, on human health and the proposed mitigation measures.
It will identify sensitive receivers, such as schools, medical practices, retirement homes, shops etc and assess the suitability of the site for the type of proposal described in terms of socio-economics and health.

TRAFFIC ASSESSMENT

An independent traffic specialist has been engaged to investigate and report on traffic impacts. Our investigations will confirm volumes and assumptions.
At the moment, annually over 300,000 tonnes of waste go to the Mugga landfill directly, transported by a number of different contractors. Some would travel to the CRS recycling and renewable energy centre, some would not. Yellow recycling bins, for example, will continue to go to Mugga Lane. We will be providing this information to the community.

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