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Sent: Tuesday, 26 June 2018 2:13 AM
To: EPD, Customer Services
Subject: Objection to EIS app no. 201700053

Categories: Green Category

To the Director
Environmental Planning & Sustainable Development Directorate
EPDCustomerServices@act.gov.au.

I object to the Canberra Recycling Solutions proposal for a Materials Recovery Facility in Fishwyck. The Draft EIS, application number 201700053, should not be accepted.

I attended two local public meetings about this proposal where the overwhelming majority of local residents rejected the CRS proposal in Fishwick for the reasons set out below.

Need - Canberra already has Mugga landfill & methane capture, materials recovery at Hume, and a landfill in west belconnen. Encouraging the population to waste less is not supported by permitting development of another waste disposal or materials recovery facility. Canberra **does not need** this proposed development.

From the executive summary of the EIS

- The EIS states the facility will create 48 full time & 10 part time jobs. It does not indicate how many full time jobs will be lost from the Fishwyck business district, or Narrabundah or Griffith or Kingston foreshore because of the smell, noise or inaccessibility due to traffic clogged with trucks.
- The EIS states that greenhouse gas emissions from landfill will be reduced but does not say how. Fossil fuel emissions probably cancel ghg reduction or offset from any "green" energy generated.
- The EIS states that 60,000 tones of waste could be recovered for local or regional use. Using tables in the EIS on page 17, if *half* the food, organics paper & wood were redirected by households to new green bins or compost, that would be about 60kt. 60kt a year, is not much. It is about 410 *grams per person per day* in Canberra, of food scraps, garden clippings, paper, compostables, etc combined. 410g is hardly anything! (using 400,000 as the population of Canberra). Canberra doesn't need a massive new smelly factory to achieve this. With green bins, education & encouragement Canberrans would do much better than CRS.

Small but noted errors in the EIS -

Page 11 figure 4, "numerous other waste related activities located throughout the Fishwyck precinct". The statement is plain wrong. In the diagram presented these businesses are numbered 1 to 15. Numbers 1, 2, 3, 4, 5, 6, 11, 12, & 14 involve new materials not waste. Numbers 7, 8, 9, 10, & 15 are retail or new materials warehouses. Only number 13, Access Recycling, is a waste related activity.

Page 18, the list of plastics. Type 1 is PET not HDPE. Type 2 is HDPE not PET. What happened to type 4 or 5? These are recyclable. Don't they get recycled by CRS?

There are two sets of tables presenting risk assessments. The post mitigation tables presented on pages xvi in the summary show all assessments to be negligible, very low or low. The pre mitigation tables on page 57 to 59 reach as high as medium risk. What are the mitigations or is the mitigation

the short note in the box beside the category? If there's no actual mitigation action how come the tables are different? All the risks are inexplicably unbelievably low, for example fire and stormwater runoff (see below).

Page 79, The Access recycling glass mountain is still there, it wasn't removed before March 2018.

Page 80 "see Error, reference not found". That's a quote not a fault in gmail.

There are many more such seemingly small errors in the EIS. So many as to cast doubt on the levels of diligence taken researching or preparing this EIS for a development that will effect the whole city.

Public Consultation -

Most people i have spoken to about this proposed MRF do not know anything about it. It will effect the whole of Canberra so the whole of Canberra needs to know about it not just a few locals.

3000 letter box drops. I received 3 copies of one of those so how many people did those letter box drops reach? Not 3000.

6 nearby businesses, six!? Does this mean Purdon didn't contact all those 15 businesses listed on page 11?

Who are the stakeholders? All of Canberra, are stakeholders.

Public Consultation means the whole public not a small selection of locals that might be made to get out of the way. Public Consultation for the Hume facility was also dreadful and the senior officers of Purdon Planners should have known better and done a better job of public consultation with this project if they were actually listening to responses on public consultation from the Hume project.

Health Risks – The Health Report in the EIS is inadequate and fails to assess the air quality issue for this inner south area, the hazardous working conditions inside a supposedly sealed shed and the increased diesel fumes concentrated by slow moving heavy vehicles on the single through lanes of Ipswich St.

The NSW EPA has assessed the Queanbeyan/Canberra area as having the highest reading of 2.5 particulates outside of Sydney. Those with asthma and hay fever are aware of the breathing difficulties. Not taken into account is the cumulative effect on human health from activities in the adjacent scrap metal yard which is the rail freight to Port Botany, integral to the project.

The EIS fails to address air quality during atmospheric inversion events either. In such an event all the smell, fumes and particulates are trapped at ground level, reducing air quality markedly.

These inversions are common in winter in Canberra and are one of the driving reasons smokey wood burning fires for heating were restricted or discouraged many years ago.

Odour - One obvious impact for locals living close to the proposal is smell, all the red bin waste and commercial bin waste from Canberra and surrounds will be processed in the shed to be built with the fumes drawn up via 9m high chimneys and pumped into the air to swirl around our area. CRS have not justified a major part of its proposal by comparison with sheds that transfer both red bin (wet) and dry waste in the one facility. The similar Banksmeadow transfer terminal in Sydney found it could only handle the single stream of red bin waste to Woodlawn despite intending both.

Of course any smell would be worse in an atmospheric inversion.

Traffic - All garbage trucks along with much larger articulated and B Double vehicles will need to access and leave the site each day. This equates to 460 extra garbage truck movements on Ipswich St alone. This is already a congested traffic area and these numbers will bring Fyshwick traffic around the site close to a standstill when it is operating. The EIS has not accounted for the lunch time peak for traffic in the area nor can modelling be done on an average truck movement in and out of the site. It is required to address a worst case scenario. If trucks travel mainly between 7am

and 4pm the average is more likely to be one every 2 not 4 minutes. Obviously queueing will occur as happens at Mugga now.

The EIS does not mention at all who will maintain the roads. Wear & tear from 460 trucks a day will probably necessitate increased costs (borne by the ACT budget) for road maintenance and or widening.

Noise – it has been shown that constant traffic and machinery noise has detrimental effects on health. Residents of Old Narrabundah already hear noise from heavy vehicles every night when background noise is minimal. Add to this another industry with longer than usual operating hours and increased truck movements as proposed. Residents close to this site will hear noise from heavy machinery processing the waste late into the evening and early in the morning as will as the trucks.

There are residents living as close as 100m on Wiluna St.

Fire Risk – The proponents do not have the best record for alleviating fire risk in their metal yard. The ACT Fire Service has been called seven times to the proponent's current operation in Lithgow St Fyshwick over the last four years.

The RISK of fire in the proposed development is therefore not low or very low as stated in the EIS. Is there a tip, landfill, recyclers or materials recovery facility in the ACT where there has not been a fire?

Another cost burden for the ACT budget would be the numerous callouts when the ACT Fire Service attends the site if this proposal goes ahead.

When a fire occurs in the facility businesses in the area would be closed down and locals could be ordered to evacuate while the fire was brought under control and toxic fumes disperse. Fires in waste transfer stations can burn for days.

Life of our Existing Mugga Lane Facility – There is no issue of poor waste management in the ACT. We have environmental targets second to none. The Mugga Lane landfill operation has legislation which supports some 30 years of operation from 2015. The environmental offsets were all in place ahead of time.

The Mugga bioreactor collecting methane to produce electricity is more efficient than at Woodlawn (Tarago) where CRS say the waste will go. We own Mugga.

We have the most advanced glass treatment in our recycling Facility at Hume.

The Waste Feasibility Study, an important government investigation over more than 2 years has a major recommendation for food and garden organics to go into our new green bins to be composted.

This CRS proposal is to rail more than 80% of the waste delivered to Fyshwick into landfill 70 km away. We have reduced waste to landfill by 30% in the time that the ACT population has more than doubled so we don't need to give CRS a **monopoly** on our waste management or to locate any waste facility at Fyshwick.

Minister Fitzharris's call to industry in February 2017 sites the Hume Waste Precinct and the area across the Monaro Highway at Hume as a centre of excellence for waste management in Australia. Canberra doesn't need this proposed development.

Recycling – The claim is to achieve a further 20% of recycle product from our bins however world figures from like facilities only show figures of between 2% and 10%. Our existing Mugga facility is already achieving these figures so the Fyshwick site would not boost the community's expectation of a better recycling model.

ACT could recover an extra 60kt if half the foodwaste currently put in red bins is put in green bins for methane capture or composted.

Devaluing our Assets – Our land is our major asset in ACT and it could be argued that the land opposite this site known as East Lake could suffer heavy losses in price expectation if this proposal went ahead. East Lake is at the notification stage and will in the future house 9000 people living in buildings up to 6 storeys high. These price devaluations will impact on property owners in Fyshwick, Symonston, Narrabundah and the Kingston Foreshore. The ACT government owns a 5.8h site in Lithgow St and Canberra Ave. Future development proposals will similarly be devalued with proximity to a red bin waste facility.

What of the impacts to business in the same street – The EIS offers little in consideration to the future of the existing businesses in this area. Shoppers will stay away because it smells & the traffic is hell among other reasons, and the viability of the businesses will be at risk, tenants will want out of their leases and landlords will be left with poor prospects for attracting new business into their premises. CRS has done no assessment of the property devaluations as promised at its presentations to community.

Our Wetlands – Little to no risk is the statement in the EIS. However this Shell site is seriously contaminated with hydrocarbons which have possibly leached into the groundwater and soil and may have migrated off site. This risk has been too easily dismissed in the EIS and the proposal offers no protection to Jerrabomberra Creek but rather exposes it to further ecological harm. No proper hydrological assessment is contained in the EIS.

The EIS claims stormwater runoff will not reach the wetlands. Stormwater drains in Canberra end up in the lake. (Sewer does not) The lake is connected to the wetlands. Stormwater from the site will reach the wetlands. Any overflow from the 15cm bund will reach the wetlands. Chemical pollutants from garbage that reach stormwater are often cumulatively toxic, specially to amphibians and birds.

Could we be stuck with a lemon – There is no evidence that the NSW Government, through their Woodlawn facility, will take all the unrecyclable waste from the ACT through this site. Why would the NSW Government legislate for Woodlawn to take some 240,000tpa from the ACT which will shorten the life of its major landfill site accepting around 20% of Sydney's red bin waste? There is also no evidence to support the claim that the ACT Government will allow contracts to CRS on any kerbside waste. Only commercial will be available.

ACT Waste Feasibility Study – This paper recommends diversion of organics from landfill, however, this proposal for Fyshwick diverts organic waste from Mugga landfill to another at Woodlawn about 70km away. We can do better as a city because we have the space at Mugga to improve our organic recycling and help achieve community expectations, along with government targets, in the future on recycling. In the ACT Waste Strategy 2011-2025 *The ACT Government has adopted the policy that the ACT must continue to manage its own waste (i.e. not send it away for disposal). As such consideration has been given to the selection of areas within the ACT suitable for landfill into the future.* This strategy policy feeds into the Waste Feasibility Study recently released.

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

The "possibility" of the incinerator being built after the MRF on page 6, section 2.1 of the EIS indicates the proponents intention.

Again, page 6 of the EIS, CRS are planning a "holistic" facility, which will require two components. This EIS is for the first component, the second component being the waste to energy incinerator. Waste to energy incinerators, touted as greenhouse friendly & progressive, are really filthy fossil fueled power stations. The waste plastics largely being burned were made of fossil resources in the first place and the carbon sequestered therein is far better left as solid in plastic & buried than burned & emitted to the atmosphere to further increase the concentration of CO₂e. Plastics don't ferment. "Green" energy doesn't involve burning anything.

A waste to energy incinerator in the centre of Canberra will destroy Canberra. Air quality will drop to far worse and more toxic than it was before wood fires were restricted.

Conclusions -

This draft EIS does not provide sufficient detailed or well enough researched information to assess environmental or any other impact.

This draft EIS should be rejected.

The whole proposal should be re-examined (if it is to proceed at all!), by a different independent objective panel of qualified individuals who can each demonstrate a complete lack of conflict of interest or tangential involvement in all aspects of the proposal.

Please note my objection to this proposal.

