

From: [REDACTED]
To: [EPD, Customer Services](#)
Subject: MRF Fyshwick
Date: Tuesday, 19 June 2018 10:22:40 AM

Submission opposing the MRF at Fyshwick

Application 201700053

Dear Minister,

I have been concerned about this proposal from the time I first heard about it last August.

In every company flyer and public meeting since, the proposal changes, to the point that confidence in this company to be able to deliver an environmentally safe development that offers a firm guarantee to the people of the ACT that their waste services will be secure is diminished.

I have read some of the submissions so far and note that others have similar concerns,

The financial capacity of the proponent to deliver all that is promised has not been demonstrated. The November 2017 Scoping Application states "The investment in the project will ultimately exceed some \$50 million dollars". I contend that it is likely to exceed this amount and that this poses the risk that the technical and environmental problems that this site poses will be inadequately dealt with in spite of any statements to the contrary.

My concerns are based on the observation that the waste stream is what underlies the commercial viability of the development and the sources and types of waste to be received are not described in detail in the EIS. If less than the 300000tpa is available how will the operations of the facility be reduced? If less than the 20% is recyclable then how will the profits be reduced. This is not information which should be commercially in confidence but which is critical to the construction to the highest standards and the safe environmental performance of the facility.

A number of major issues immediately come to mind when considering the above.

1. What will be the cost to the business of adequate site remediation and continued monitoring over the life of the operation? These costs include the demolition costs including the safe removal of the asbestos, lead and suspected PFAS on site.
2. What will be the added cost of supply and careful installation of a geomembrane vapour barrier with a performance guarantee adequate to the site specifics and the life of the proposal? Certified QA/QC inspection of the installation process as the EIS promises will add at least 50% to the total cost of the purchase and installation of the barrier.
3. What will be the cost of the leachate collection and treatment system if leachate is to be completely isolated from the stormwater and sewerage systems, as it must be?

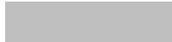
Each of the above is very costly beyond that which can be justified by the waste stream that is on offer in the ACT.

It is not uncommon with major developments, for mitigation and monitoring promises to be made at the DA stage and then ignored once consent has been gained or an application to amend the approval be submitted soon after the approval. In most cases this is based on the extraordinary costs of doing the right thing by the environment. The capacity of the proponents to cover these costs in addition to the construction of the MRF and MRT can be questioned when one considers the urgency with which he sought to recover his bond held by Shell for the remediation of the site as evidenced in EPA emails obtained under FOI.

The residents and traders of the area have expressed the view that Fyshwick is not a suitable site for a waste transfer station and MRF of this size. To that view I must add that the contaminated condition of the site adds insurmountable constraints to its success since its present condition, if to be overcome, will add costs to the build such that it is likely that the mitigation measures necessary to achieve an environmentally sustainable development will not be implemented. This EIS offers no firm commitment.

I humbly request that the Minister in the public interest further investigates the estimated costs of developing this proposal with the best practice environmental, social and economic outcomes achieved and the business capacity of the proponents to finance it.

Yours sincerely,

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