

SUBMISSION ON DRAFT EIS FOR THE PROPOSED MATERIALS RECOVERY FACILITY IN FYSHWICK

I have outlined below my concerns about the proposed Materials Recovery Facility in Fyshwick as proposed by Capital Recycling Solutions (CRS)

TRAFFIC

Of particular concern in this EIS is the analysis of traffic congestion.

Firstly, the analysis focuses on the morning and afternoon peak hour movement of traffic through the Ipswich/Wiluna/Lithgow streets. This does not account for further peak movements of traffic around lunch time on weekdays and then again on Saturday mornings.

Secondly, because Ipswich street is a major thoroughfare between the Monaro Highway and Canberra avenue, the transport analysis falls short by not properly analysing potential traffic congestion at the intersections of Newcastle/Ipswich/Monaro Highway and the Canberra/Ipswich/Monaro Highway connection. There is often a backlog of traffic at these points and the addition of garbage trucks throughout the day will only exacerbate this.

These choke points will become more congested as the Eastlake development and the Dairy Flat development come on stream. With the many thousands of additional residents located in close proximity to the Fyshwick material waste facility, this will lead to additional traffic congestion. None of this future development and its effect on traffic congestion has been adequately accounted for in the draft EIS.

Thirdly, the negative impact of traffic movements on the viability of surrounding businesses has not been adequately analysed especially with regard to the nature of the current traffic in these surrounding streets. In particular, the level of truck movements already occurring does not seem to have been adequately addressed.

Lastly, should the rail corridor be unavailable, trucks would be needed to move the residual waste from the site and the risk of this happening is not properly accounted for.

AIR POLLUTION AND ODOUR

This draft EIS has not provided a comprehensible report on air quality as required by the Scoping Document. Instead, the information on air quality is heavily laden with jargon and assertions.

Even with the best planning, waste facilities have some odour problems, pest issues and often suffer from litter being scattered on site and windblown to adjacent streets.

Indeed, in the EIS it is acknowledged that there will be odour associated with the facility although it is claimed that a number of mitigation measures will minimise this occurrence. In the report done by Odour Modelling Pty Ltd, the proportions of different wastes is assumed; however, later it is admitted that these assumed proportions are not known at this stage and it is only when the facility is operation can these proportions be established. Therefore we can conclude that insufficient evidence has been presented to prove that noxious and persistent odours won't emanate from this facility.

This is a critical issue for the surrounding residences and businesses within Fyshwick and the nearby residential areas of Narrabundah and Symonston plus the Canberra South Motor Park. Added to these affected areas will be the future Eastlake development and Dairy Flat development by the Molonglo group near the Jerrabomberra Wetlands. No adverse impacts have been assessed on these future developments with many thousands of residents.

It is stated that mitigation strategies will be implemented to minimise the odour including minimal doors and openings plus the doors with be fast opening vinyl doors. In reality, the movement trucks into the facility will not necessarily occur every 4 minutes. This is only an average figure and garbage trucks will more likely arrive at the facility more closely together in time. With the frequency of garbage trucks and the potential for these to be banked up for discharging waste, the doors to the facility may be open for extended periods to allow the trucks to come and go. Hence the potential for noxious odours may be much greater than asserted in this report.

FIRE RISK

The risk of fire in a waste facility of any nature is an ever-present risk. A fire can disrupt the whole process of waste collection and its disposal. A fire will also result in the disruption of activities in the surrounding areas, and in this case of a waste facility in Fyshwick, it would affect businesses throughout Fyshwick. Added to these problems, fire from waste facilities can produce toxic fumes that affect on-site workers, workers at surrounding businesses and nearby residents. Hence it is desirable that waste facilities are in stand-alone precincts away from businesses and residents as is the case of Mugga Lane tip.

According to the records, over the past seven years there have been 7 fires attended by the ACT Fire & Rescue at the metal recycling facility operated by Access Recycling facility at 15 Lithgow Street Fyshwick. Prior to this, Sims Metal had one fire between 2006 and 2014 at the same site. Even this past week there was an extensive fire at a scrap metal yard in Beard. While these fires have been at metal recycling facilities, the potential risk of fire associated with general

disposal and recycling of waste is arguably greater especially where lithium ion batteries are disposed of in general waste.

While the risks from bushfire in the suburb of Fyshwick affecting the waste transfer facility are discussed, there is little mention of the risk of internally generated fires, something that is arguably a greater problem and would have an immense impact on the community.

This EIS analysis of fire risk is totally inadequate and without of comprehensive analysis of this issue, the EIS falls short.

CONCLUSION

The draft EIS for the Materials Waste Facility at Fyshwick presented by Capital Recycling Solutions (CRS) falls short on a variety of issues and therefore in my opinion is unacceptable. If the proposal was to be judged on this current draft EIS alone I consider that the whole proposal should be rejected.

In my submission I have identified that the draft EIS has inadequate analysis of traffic congestion, fire risk and air pollution and odour. CRS should be required to undertake more detailed analysis of these issues and risks, as well as address the inadequacies identified in other submissions. Given the shortfalls of the current draft EIS I believe that CRS should submit an updated draft EIS so the community can once again comment on this proposal.

