

From: [REDACTED]
Sent: Monday, 25 June 2018 9:16 PM
To: EPD, Customer Services
Subject: Application No: 201700053 Submission opposing the MRF at Fyshwick

Categories: Green Category

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Submission opposing the MRF at Fyshwick

Dear EDS,

I write to oppose the Materials Recovery Facility proposed by Capital Recycling Solutions. My concerns about this proposal have only increased after reading the EIS produced by the proponents, given that:

- Fyshwick is zoned in the Territory Plan for “light” industry. The functionality of this facility does not equate to “light” industry, and is more properly sited in Mugga Lane. Why should the residents of Canberra allow such a profound alteration to the Territory Plan, and all the attendant negative impacts, simply because it suits the proponents business model to be close to the rail line?
- The Health Report in the EIS is inadequate. Increased diesel pollution from significantly heavier traffic of diesel vehicles to and from the site will increase air pollution over south Canberra - and perhaps beyond due to the temperature inversion that occurs over our city. Air quality will be further compromised by the use of heavy machinery and manoeuvring of waste. Fire, in terms of air pollution is also of great concern given the contaminated soil on the old SHELL petrochemical site, and its proximity to residential areas and the Jerrabomberra Creek.
- The EIS does not adequately address the likelihood of odours escaping from the site. With 460 truck movements, I fail to see an opportunity to actually ever close the impressive sounding sealed door and there is no way to regulate this. Very likely it will remain open for the majority of the 24h operation period allowing unpleasant odours to permeate the atmosphere. Regardless, odour will escape from the trucks, and the venting system. The modelling in the EIS for odour management is ambiguous and unconvincing and the proponents have not addressed this aspect satisfactorily.
- The EIS does not adequately address the impact of increased traffic and truck movements to and from the site in Fyshwick. The impact on local businesses may well be catastrophic, leaving Fyshwick to become a ghost town, until it is filled up with other heavy industries thanks to the rezoning that will have occurred. This aspect of the EIS is so unconvincing and lacking in detail as to be almost a joke. How will the existing road infrastructure cope with the significant increase in traffic to a site that, while close to the rail line, is uniquely difficult to access by road. The modelling put forward in the EIS is dubious and unconvincing (especially given the poor track record of the contractor who provided it), and does not address the worst case scenario of converging trucks during peak hour. Mitigation of the impacts by the proponent cannot even be discussed, given that the EIS does not satisfactorily recognise or address them.
 - The EIS does not adequately address the noise pollution that will be generated by this facility. Noise from the scrap metal recycling yard, at night, is already a problem, (inadequately policed by the ACT Government) and can be heard in many bedrooms in Narrabundah as mountains of glass and scrap metal are moved around the site. When the site is occupied by a facility in operation 24 hours a day, seven days a week, with heavy machinery unloading and loading onto the rail, the noise impacts on close by residents will be significant. Again, the EIS fails to effectively model this risk and accordingly fails to address the risk of noise pollution to the amenity of business owners and residents working and living within a kilometre of the site. Further, there appears to be no obstacle to CRS freighting scrap metal and other waste from their Sydney-based operations into Canberra and then out to Woodlawn (thereby avoiding fees levied on “Sydney” waste). This alone would greatly increase activity at the site around the clock and generate noise.
 - The EIS does not adequately address the risk of fire at this facility. As observed by the Old Narrabundah Community Council paper, the proponents do not have the best record for alleviating fire risk in their metal yard, with the ACT Fire Service having been in attendance seven times in the past four years to the proponent’s current operation in Lithgow St Fyshwick. Fire is a serious risk in waste sorting facilities due to the

toxicity of fumes, in this case compounded due to the contaminated soil on the SHELL site and its proximity to populated residential areas with schools and daycare centres.

- The EIS does not adequately recognise or put forward management strategies for the possible occurrence of the above risks simultaneously, (say, a fire onsite and serious traffic congestion for example) enhancing the potential negative risk and poor impacts for Canberra businesses and residents.
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- In addition, this proposal is very likely the gateway to the proponents building a Waste to Energy incinerator. I understand that the Material Recovery Facility that this EIS relates to, is only stage 1 of the proponents application to the planning authority, with stage 2 slated for the Waste to Energy incinerator. An incinerator would generate a whole raft of other concerns along the lines of the above, due to its fundamentally inappropriate proximity to residential areas. One does have to wonder how well the business model of CRS stands up for stage 1 without stage 2, and whether stage 1 is only the gateway for placing an incinerator virtually in the centre of Canberra.
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- I call on the planning authority to reject this proposal and enforce the spirit of the planning process that requires an EIS that is honest, sound and executed with veracity and professionalism. The amenity and health of Canberra residents should not be able to be purchased so cheaply by this embarrassingly inadequate, misleading application.

