

**Submission Responding to
Draft Environmental Impact Statement:
Materials Recovery Facility Fyshwick: April 2018**

**To the Director General of ACT Planning.
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I refer to the above-mentioned Draft Environmental Impact Statement (EIS). I would like to register the several concerns I have about this project.

1. The addition of a very large number of heavy duty garbage trucks into an already busy road system in Fyshwick will have serious negative consequences. This road system already has some intersections at or near capacity, especially the Monaro Highway / Ipswich Street intersection at Canberra Avenue and the Monaro Highway/Newcastle Street intersection. These intersections have short sections before the next set of traffic lights and already fill up quickly. Additional heavy trucks will increase the risk of accidents. The additional diesel truck traffic will add considerably to atmospheric pollution.
2. The project is expected to seriously impact surrounding businesses and nearby current and future residents because of increased traffic congestion, smell, noise and dust. Quick opening and closing doors are ineffective if they are constantly opening and closing due to frequent traffic entering and exiting. The site is already heavily polluted from its previous use as a fuel depot.
3. Recent articles in the local press indicate nearby businesses are extremely concerned about their future if this business is allowed. Jobs will be lost, not created. The ongoing viability of Fyshwick in its current role seems to be at considerable risk due to the potential addition of just this one business. Also the business profile of Fyshwick will change away from its current trend.
4. The site is very close to Jerrabomberra Wetlands Nature Reserve and there are residential areas nearby in Fyshwick, Narrabundah and Kingston. There appears to be a very high likelihood that the facility will be injurious to the health of both humans and wildlife even during normal operation, let alone if unexpected disastrous events occur to the

processing at the site (such as the recent fire in a metal recycling plant in Underwood St, Beard).

5. Current Canberra rubbish facilities are appropriately located at more remote locations in Canberra which are dedicated to waste handling, and further away from residential areas. As Canberra continues to grow in population, it makes no sense to locate a new materials recovery facility in a central area very close to existing and planned residential areas. Also, existing Canberra rubbish facilities have some years of capacity available and hence, there appears to be no immediate urgency for a new facility.
6. The proposed facility is understood to be the largest in Australia. This would on the face of it appear excessive for the ACT. We should not be producing this amount of waste and it is too risky for a single private operator have a monopoly.
7. An independent air quality assessment report is needed which assesses the existing base levels of air pollution (which could be significant) and the impact of the proposed development. We do not know if even a small amount of additional pollution will tip the area over unhealthy levels (if it is not already there).
8. A number of concerns bring into question whether the draft EIS and Scoping Document have lawful foundations. Some of these follow.
9. The applicant does not yet own all the land for which a draft EIS has been submitted and a development application approved (also of questionable legal basis).
10. Rail use is a prohibited use under Territory law for Block 11, Section 8.
11. There are a number of deficiencies with the Development Application including that the applicant did not own the land and it was lodged under the incorrect track.
12. There is considerable inconsistency between the various documents about the intended or approved use of the land (for example, the DA application, DA approval, Direct Sale Panel advice to the Minister). Uses

proposed or approved variously include heavy rail siding, metal recycling facility, hard stand, processing of red bin waste.

13. The whole process is inappropriately proceeding before the ACT government has finalised its Waste Feasibility Study. This study should identify better waste management options in more appropriate locations.

In summary, this seems to be an ill-conceived project that should be terminated as soon as possible. The ongoing uncertainty resulting from prolonging this potential project will continue to cause concern in the community, placing existing Fyshwick businesses at risk and potentially impacting the value of nearby residential properties.

