

**Please find my objection to EIS201700053, Fyshwick MRF
24 June 2018**

The ACTPLA Scoping Document requires on page 1 at;

4. Introduction

Summarise the proposal background and justification for the proposal.

The Minister must reject the CRS proposal to transfer waste to another landfill site as the ACT Mugga Landfill is available.

Neither in the introduction nor throughout its draft EIS does CRS justify the need for the proposed Materials Recovery Facility to involve the transfer of household and commercial waste currently going to Mugga Lane landfill in its rural setting to be brought into urban Fyshwick, minimally sorted and then transferred to containers for at least 80% of the waste to then be railed to another landfill 70km away at Woodlawn. CRS claims in its draft EIS at 2.6.1, (p. 28).

At the stated current total landfilling rate (in excess of 300,000 tonnes per annum) the estimated life of the Mugga Lane facility's is no more than a few years.

This is untrue. CRS should have sought confirmation of its claim above from ACT NoWaste or ACTPLA. The EIS for the Mugga Lane Landfill Expansion -5 provided further life of 30 years from 2015. So far three DAs have been approved and enacted and offsets are in place in compliance with Federal legislation. From TCCS advice, the EIS current approvals will be extended as required. This information is publically available. CRS has sought to mislead when on page 6 of its draft EIS it estimates the life of the Mugga Lane facility in its *current form is no more than a few years*. CRS promotes this specious claim as a justification for its proposed waste transfer terminal.

The Minister must reject the CRS proposal to transfer waste because we do not need to.

It is the case that when the food and garden organics are collected in the new green bins for composting, the lifespan of the Mugga Landfill could extend into 2100 thus saving on current projected costs. Minister Fitzharris on launching the long awaited *Waste Feasibility Study* said;

The recommendations in this report build on the ACT Government's commitment to reducing greenhouse gas emissions by focusing on the reduction of organic material from landfill and will complement the green bin collection service already being rolled-out across the city. Indeed a composting site and food and organic waste collection service could see 40,000 tonnes of waste diverted from landfill.

The CRS alternative to transfer waste to Woodlawn landfill is simply not needed and undermines the ACT Government's intentions of FOGO kerbside collection supported by a budget allocation for 2017-18 of some \$33.3m. If compost were ever to be sourced from red bin waste at the Woodlawn MBT is unsuitable for garden/commercial use because of the contaminated product. Compost separated at source is a much better and unpolluted product. The green waste collected at mugga has a contamination measure of 0.05. More than 20 NSW councils are collecting FOGO for composting into agriculture etc. Regardless, it is CRS intention to landfill the ACT waste and not compost.

The Minister must reject the CRS proposal to locate any MRF and waste transfer at Fyshwick as this is not the Government's preferred option.

Minister Fitzharris in February 2017 called for innovative ideas from industry to manage ACT's waste into the future. The accompanying Market Sounding echoes page 32 of the ACT Waste Strategy (2011-2025), where it advises that;

major new waste infrastructure will primarily be located in the Hume Resource Recovery Estate beside the Mugga Lane Resource Management Centre. The Hume Resource Recovery Estate is being developed in conjunction with the Mugga Lane Resource Management Centre as a recycling estate housing a range of facilities.

The strategy (p. 32) additionally points out that;

There are a number of benefits that arise from the co-location of waste facilities in the Hume Resource Recovery Estate, including the synergies between different parts of the recycling industry which could result in increased resource recovery, reduced costs and reduced traffic movements.

The *Market Sounding to Industry* in Attachment 2-(p.16) identifies the Hume Waste Precinct to become a centre of excellence in waste management into the future;

A2.1 The Hume Waste Precinct is immediately southeast of the ACT landfill and, aside from its proximity to the transfer station, recycling collection and green waste processing that occurs, is adjacent to a major arterial road that connects to the Interstate highway. Rail and air links are nearby, as is the NSW boundary. The area is zoned industrial and it is an excellent site for a waste precinct and is one that will eventually grow into a nationally recognised waste centre of excellence.

The Hume solution for location of major waste facilities being the Government's publically stated intention above, was not properly investigated by CRS. The Market Sounding notes the proximity of the rail link at Hume. If it were the case for rail freight to be viable then many freight businesses are already operating in that IZ1 precinct. Surely both governments and industry could engage in a PPP with the aim of restoring the railway use from Hume. Currently sites at Hume including adjacent to rail lines are on the market.

The CRS proposal is touted as the solution for all of Canberra's waste to landfill. It is a major waste facility that is inappropriate to be located in Central Canberra at Fyshwick, where commercial and retail businesses including those related to the preparation and marketing of food abound; and where available land is at a premium to be transformed into urban infill such as proposed at East Lake and the Dairy Road Foreshore.

The Minister must find that the CRS proposal is inappropriate in regard to use or location and for both reasons must be rejected.

Sincerely

