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**From:** [REDACTED]  
**Sent:** Wednesday, 27 June 2018 11:39 PM  
**To:** EPD, Customer Services  
**Cc:** [REDACTED]  
**Subject:** Submission AGAINST CRS Materials Recovery facility

**Categories:** Green Category

SUBMISSION AGAINST  
CRS Materials Recovery Facility  
IPSWICH STREET FYSHWICK  
Application No, [201700053](#)  
[EPDCustomerServices@act.gov.au](mailto:EPDCustomerServices@act.gov.au)

[REDACTED]

(Please redact my name and address, when publishing on your website)

Dear Madam/Sir

I object to the CRS proposal as it rests on an outdated business model. It is a band aid solution but not a sustainable solution to achieve a sustainable zero waste future for the ACT and its community, including businesses and industry.

A far better and fairer model is a “pay as you throw” model, where the end user who creates the waste pays for the waste created. At the same time there is source separated collection of various waste streams, available for free or a small fee and there are additional public recycling centres, where people can also bring any other source separated waste streams for free that are not collected through the bin system. The recently introduced China sword policy highlights the urgent need to produce as a community clean, uncontaminated (source separated) waste for further recycling and FOGO for composting.

The justification for the CRS proposal rests on three main arguments.

1. Mugga Lane landfill has a limited life of only a few more years.
2. Diverting waste from Mugga Lane landfill will have a positive climate change benefit.
3. The MRF will recover more than 20% of recyclable material currently transported to landfill.

Each of these statements does not stand up to scrutiny.

[1] CRS continues to make wild claims about the life of the Mugga Lane landfill and the methane capture that are not supported by rigorous evidenced based assessment. The life of Mugga Lane is well beyond the few years claimed by the proponent and the methane capture of around 70% as good as at Woodlawn. The life of the current operating cells might only be a few years but Mugga Lane has approval for 10 cells up to 2043 and longer when improved operational methods are employed. And longer again when the green bin trial is extended across the ACT.

The ACT Waste Feasibility Study has presented its 'Roadmap' for improved waste management practices in the ACT. The Roadmap of initiatives and recommendations have been informed by the views of a range of stakeholders, data and research and is a key deliverable of the Study, which could:

- drive the ACT's resource recovery rate from its recent levels of around 70% towards 90%; and
- divert up to 170,000 tonnes of waste from landfill.

The Roadmap also highlights the need for renewed community and industry commitment to waste avoidance measures, particularly in reducing food waste and improved recycling practices.

From the Waste Feasibility Study the amount of ACT waste disposal has changed little since 2013 in contradiction with the EIS claims that "The problem that the ACT is now encountering is high levels of waste production per capita, growing by 2% per annum, as well as levels of recycling not matching this growing creation of waste." With improved practices in daily cover and improved compaction of waste at the landfill the life of the tip would extend well beyond the 2043. Diversion of the 30-40% of green waste at the kerbside when the new green bin trial is extended and a composting option for the ACT could ensure that Mugga Lane landfill has a projected life into the next century.

The Study recommends the implementation of a kerbside FOGO collection service which is aligned with the current ACT Waste Management Strategy 2011-25 and the waste hierarchy principle by outlining efforts to reduce, reuse and recycle waste above energy recovery and landfilling. The ACT government's Waste Feasibility Study features some laudable initiatives on FOGO and anaerobic digestion and composting. The study identified that an additional kerbside FOGO collections service provides an opportunity to significantly reduce the tonnes of food waste from households currently disposed of to landfill. The waste audit reports indicate that organics comprise 37% of kerbside waste collection. Diverting this waste from landfill will also contribute to the longevity of Mugga Lane. With good educational on source sorting of food organics this waste stream will achieve a low level of contamination and be capable of producing a composite product suitable for commercial use, superior to what is produced at Woodlawn. It is important that this initiative be allowed to be fully developed with a suitable site selected for the composting facility and the necessary education and community engagement period.

[2] The Mugga Lane tip far from being inferior to Woodlawn, captures 70% of the methane and turns it into power. It may be true that Woodlawn's system may produce more power but the EIS fails to prove that it is more efficient in reducing the escape of ambient methane. The time span of methane production should have been calculated. Mugga Lane is a much older landfill than Woodlawn and is already collecting methane from legacy waste. Woodlawn, a newer landfill, with more waste in plastic bags taking longer to open and decompose, will produce methane for many more years than Mugga Lane and hence cannot be compared favourably for Greenhouse abatement.

For a comprehensive climate change assessment the EIS should have estimated the power consumption of the daily operation of the machinery used for recycling and compaction of the waste and to account for the methane produced in the MRF building and containerised, compacted waste. Additionally, the trucks arriving empty to the CRS site for the collection of recyclables will only add to the diesel air emissions and Climate Change. The CRS proposal in no way could be justified to be a positive influence on Climate Change when compared with present Government recommendations.

[3] With recent Chinese restrictions on processing of contaminated waste now becoming effective and resulting in local gluts of recyclables the 20% recyclables target must be challenged. Lack of reliable data in the EIS on the origins and source of the waste to be accepted by the MRF makes it difficult to form any conclusions about projected recovery rates. Composition of waste changes from season to season, place to place. Over time with better packaging laws and household recycling it could become even more difficult to meet the 20% target estimated by CRS.

Markets for recycled materials will have to be found while the demand for uncontaminated materials such as with China reduce the profitability and final percentage outcome of the recycling enterprise. In Leeds for

example, a MRF such as this had a target of 10% recoverable material but in its first year struggled to reach 2.5% and has now adjusted its target to 4.5%.

Minister Fitzharris in regard to the Waste Feasibility Study, developed over the past two years commented that the recommendations of the study have; “the potential to divert 170,000tonnes of waste from landfill”. She continued that "Canberra is home to a pro-active community who care about the environment and want to play a bigger role in diverting the waste we send to landfill each year.” Furthermore the Minister proclaims that; “the recommendations are consistent with the waste hierarchy principle to reduce, reuse, and recycle waste above energy recovery and landfilling.” Thus, contrary to the claims of the draft EIS, the CRS proposal to transfer mixed (dirty) waste including organics from Mugga Lane landfill to Woodlawn landfill serves to undermine ACT Government policy and intentions contained in the ACT Waste Management Strategy (2011 – 2025) and the associated Waste Feasibility Study.

CRS has failed to justify that Canberra is in need of a further recycling facility or any transfer of waste from a landfill we own to a landfill at some 70 km distance. The cost to the ratepayers of the double handling of the waste; the tipping fees and the NSW Waste levy has not been accounted for. The Government had in 2013 dismissed transport of waste to Woodlawn as too costly.

This submission is not an argument in favour of landfills but rather an argument that to move all of the Mugga Lane waste to Fyshwick is not the innovative, well considered, community supported solution to waste management in the ACT that the Waste Feasibility Study is seeking.

Far better outcomes on the way to a zero waste community in alignment with the ACT’s new Climate change Strategy to 2045 will be achieved by introducing **source separated collection of waste streams and making available to the public several recycling centres where a variety of “waste streams” can be placed into the various containers for separated recycling of these waste streams. Waste is seen as valuable resource. Drop off at these centres must be free** for all households. Businesses and industry can pay a small fee but will benefit from less waste to landfill fees.

This will achieve far superior outcomes of clean uncontaminated waste streams that can be recycled again or in the case of FOGO composted. Therefore it will be crucial that the ACT will get a FOGO system for source separated collection of food organics and green organics, applicable to households and industry as soon as possible.

Lastly a **“Pay as you throw” system would make people and businesses think twice what materials can be recycled or composted and what they want to pay for as waste going to landfill.** Pay as you throw systems re in place in Germany, Italy and many other countries and work very effectively in reducing waste going to landfill. It is a Win -win for the community, the individual, the environment and the climate. The CRS proposal only is an outdated business model serving CRS alone and its proprietors.

Having returned from an extended stay in Germany and Austria only yesterday, I have been able to observe and experience and participate in source separated collection of all kinds of “waste” streams first hand. This is the most efficient way, how we as community in the ACT can achieve a sustainable zero waste future and far better recycling figures than any outdated proposal such as the one before us by CRS.

Mugga Lane would always have to remain open as a facility with sufficient longevity to deal with some residual waste that require this disposal option. We do not need the CRS proposal to ensure this.

When the three cornerstones of this proposal are examined in more detail by the Government it should see that the development cannot be justified and must be rejected.

Sincerely

[REDACTED]

26 June 2018

Please confirm receipt of my submission. Thank you.

Sent from my iPad