

From: [REDACTED]
To: [EPD, Customer Services](#)
Subject: Submission of MRF at Fyshwick
Date: Friday, 1 June 2018 2:59:36 PM

**Submission on draft EIS
by Capital Recycling Solutions
NI 20170053
FOR the proposed MRF and WtE in Fyshwick
To The Minister for Planning**

This is a submission objecting to the above Development based on the Split DA and EIS.

In spite of maintained under repeated questioning, that CRS is not pursuing a Waste-to-Energy option their statements are not confirmed by their own latest Scoping Application document which says

“Capital Recycling Solutions Pty Ltd (CRS) has prepared this Scoping Application in accordance with the requirements of the ACT Planning and Environment ACT, 2007 and is associated to the previous Application number 201700023 – Materials recovery facility and waste to energy (WtE) thermal conversion and emission control equipment.

This request for a separate EIS scoping document comes after extensive community consultation as part of the process for application number 201700023, which has influenced our approach to split the original proposal into its key components. 1.The Materials Recovery Facility and Rail Freight Terminal (MRF) 2.The Waste to Energy facility (WtE) We consider the WtE facility ancillary to the overall solution in that it is dealing with residues from the MRF and does not impact on its effectiveness or viability. As such, we are proposing to proceed with an EIS process for the MRF only, with a separate EIS process to be undertaken for the WtE component at a later date. “ p.3

Consequently CRS's draft EIS for a Fyshwick MRF should be judged as just a first stage towards an incinerator rather than as a stand-alone facility for shipment of all of ACT's red bin and Commercial waste to landfill at Woodlawn. Recent utterances by CRS that it has dropped plans altogether, rather than delayed by half a year or so, for an on-site WtE incinerator therefore are questionable.

The enlarged MRF facility covering most of block 9, does not preclude development of integrated incineration units. There seems no other explanation for the 7250 square metre building.

The full Scoping Application document makes it clear that the incinerator option, not the Woodlawn option, is the real future goal of CRS. That means that CRS either has misled the ACT government in its Scoping Application document or is misleading the to-be-affected community. On either of these grounds of serious misinformation the draft EIS should be rejected.

The initial Scoping Document May 2017, detailed EPSDD's requirements for draft EIS documentation on both the MRF and incinerator components. The present Scoping Document November 2017 and draft EIS address only the MRF component. The MRF and the incinerator are innately dependent on each other. The Scoping Document obliquely acknowledges this fact by requiring the developer to;

“5.1 h) Provide a description of the proposal, including

An outline of any developments that have been, or are being, undertaken by the proponent, or other person(s) or entities, within the proposal area and broadly in the region. Describe how the proposal relates to those in the region affected by the proposal.”

I maintain that this requirement includes future developments that are either known or foreseeable. The current draft EIS for review provides incomplete documentation on the ultimately integrated MRF/WtE facility and should be rejected on that ground alone.

Splitting the original draft EIS into two drafts makes little sense for the many negative consequences. It does not allow for an adequate consideration of cumulative impacts of those aspects of the development(s) which are common such as impacts on waste volumes, air, health, traffic, water quality among others. A reasonable person could conclude that the intention was to avoid the more rigorous environmental scrutiny of the development.

The concern arises as to whether an incinerator can actually be built whilst the MRF is operational. Separate construction of MRF and incinerator will be far more costly than construction in one go. Surely it cannot be the intention of CRS to ever develop and operate an MRF separately from an incinerator. So CRS' real motives for splitting the EIS and obtaining split approvals could be perceived to be an attempt to manipulate the process. Incineration is a Prohibited Development under the IZ2 Mixed Industrial Territory Plan Development Tables. From the Scoping Application we can see already that the developer is calling it an “ancillary” activity to the MRF. This must be vehemently opposed. The Scoping Application is firm evidence that this is one development in two stages and that without a Territory Plan Variation the incinerator component cannot proceed.

I further submit that approval of an MRF and the early securing of a large part of the ACT's waste supply prior to the other thirty or so applicants having a chance to bid for it is in conflict with the government's own policy in the Waste Feasibility Study. CRS has an unfair advantage. No approval for any stage of this controversial development should be granted till the community has been given the opportunity to have its say on The Waste Feasibility Study; the desired waste management strategies for the ACT and on the WtE component considered as one with the MRF.

Yours sincerely,

