

[REDACTED]

From: [REDACTED]
Sent: Thursday, 28 June 2018 1:33 PM
To: EPD, Customer Services
Subject: Objection to Proposed Waste Recovery Facility (EIS 20170053) Fyshwick
Attachments: Submission on Waste Recycling Facility EIS Submission - [REDACTED].pdf

Categories: Yellow Category

Hi
As discussed, I have just realised there was an error in the original submission I lodged last night at 12:55 pm.

Please find attached a pdf of my submission to replace the draft letter I accidentally attached to the email sent last night.

Please delete the attachment to the previous email.

[REDACTED]

[REDACTED]

[REDACTED]

To: EPDCustomerServices@act.gov.au

RE: Draft Environmental Impact Statement, for Proposed Materials Recovery Facility
Fyshwick (Section 8, Blocks 9 & 11) ACT

Dear Mr Ponton,

I wish to lodge my strong objection to the proposed Materials Recovery Facility (MRF) development being located on the site fronting Ipswich St Fyshwick. My objection is based on several highly problematic issues with the proposal that altogether render it inappropriate and incompatible with that location in Fyshwick.

1. The Draft Environmental Impact Statement (EIS) should be rejected firstly, because it skirts over the issues/problems associated with the proposed development in a way that downplays the potential impacts to the point of being misleading. And secondly, because it fails to include any detail about how using "European type" processes for recovering recyclable material from the Municipal solid waste (MSW) stream is going to work in effectively and economically.

2. The MRF has been supposedly designed to receive 300,000 tonnes of Canberra garbage per year of both unrecycled raw wastes and residues from other recycling processes. That's an average of 900 tonnes per day (EIS p20) being delivered to the MRF. Over 50% of the MSW delivered each day would be from Canberra's domestic red lid bin collections and commercial garbage bags. That's roughly, 500 tonnes of putrescible waste (general garbage comprising raw and rotting food organics, cardboard, plastics, green waste etc) that has been mixed and compacted in the back of garbage trucks then dumped onto the floor of the MRF building. There is nothing in the EIS that provides any detail to support the suggestion that "All waste received will be immediately sorted before being fed into one of the MRF processing lines"... "The separation process will be a combination of mechanical and manual sorting to be able to remove reusable material for export from site" (EIS p18)... "CSR conservatively proposes to capture and recycle more than 20% from the waste residue streams diverted from Mugga Lane Landfill". "The remaining residues will be transferred by rail to woodlawn" (EIS p19). The suggestion that there will be a "process" to extract 20% of recyclables from the cross-contaminated MSW waste delivered in amongst the 75 odd tonnes of waste coming in every hour has to be called out for what it is - absolute bullshit. Anyone that has seen the shredded plastic bags full of putrid red bin waste that gets pushed out of garbage trucks will know there is very little "extraction of recyclable materials" that can be done. The fact is there is bugga all in that mixed jumble of garbage that is not contaminated and can be readily and economically recovered.

3. If the proposed solution to the bulk of Canberra's MSW waste is simply to fill containers to send to Woodlawn by rail, then that process does not have to happen in the middle of Fyshwick. It can happen from Mugga Lane Tip where there is much more available land and room for future expansion of such a facility. The Fyshwick site is too constrained and does not allow for any amount of stockpiling of recyclables like plastics and paper as currently can happen at Mugga Lane facilities. Nor does it have the space for any future expansion of facilities that will inevitably be required as Canberra continues to grow.

4. The subject site is within Fyshwick, an IZ2 Industrial Mixed-Use Land-Use Policy Zone intended for light industrial uses and provides for a wide range of business opportunities like retail shops, food and drinks establishments, clubs, restaurants etc. Anyone familiar with Fyshwick will know that the area surrounding the proposed development is far from a purely Industrial estate. It currently supports a wide mix of well-established businesses including home furnishings (Harvey Norman, Nick Scali, Bing Lee etc), cafes, takeaway food shops, food warehousing etc) where thousands of people work and come to shop. There are several businesses that have caretakers residing on site. 300m to the West, just on the other side of the Monaro highway, is the Eastlake Urban Renewal area which is part of the Government's East Basin Urban Extension area with a mix of commercial and residential being planned for. Around 500m to the East is the vibrant new Dairy Flat Road business hub already up and running and with plans for a significant residential component on the drawing board. The Canberra South Caravan park residents are located 450m to the South. The established residential area of Narrabundah, is just over 600 metres to the South-West. 800m away on the southern side of Canberra Avenue is the Symonston specialist medical/business park that includes a wide range of professional businesses including the Canberra eye hospital, specialist doctor's, dentists etc. Within 1km to the west of the site is the Fyshwick Fresh food Markets. Fyshwick has moved on from the old industrial area with brothels and bkie clubs and has developed into a vibrant and successful mixed business and services hub for South Canberra. Why would we risk all of that by introducing a red bin waste processing facility into the middle of Fyshwick? The nature of large scale processing of putrescible waste makes it manifestly incompatible with the busy heart of Fyshwick.

5. Ipswich Street is one of the main feeder streets into Fyshwick for anyone going into or through Fyshwick from the Western side of Canberra Av. It is also the main access point into this part of South Canberra from the airport/Ikea or Monaro Highway. Ipswich St is already so busy it's at a standstill at peak period's. "The proposed MRF development will result in an additional 230 heavy vehicle movements per day (EIS p69). "The facility will receive an average of 900 tonnes per day across 6.5 days per week. Across 16 hours the facility will operate per day, this equates to 15 heavy vehicle movements per hour, or one every 4 minutes". If they start at 6am that would mean they come and go continuously until 10pm. I would say 230 trucks heavy vehicle movements over 16 hours a day, 6.5 days a week will have a significant negative impact on Ipswich St and the surrounding businesses especially during peak periods. However, if the trucks arrival times can be staggered to avoid peak periods say 1 hour around 9am and 1 hour around 5pm (as suggested on P67) that of course will decrease the intervals between trucks arriving for the rest of the day. It means, outside peak periods, the interval between trucks arriving will be somewhat less than 4 minutes. And 100% of the trucks leaving the site will need to use the Ipswich St exit. The conclusion that the highest traffic impact will be on Wiluna St and Lithgow St, which will have the highest volumes of additional vehicle movement's (EIS p 70) is quite misleading. The street diagram "Figure 24: Additional hourly vehicle movements relating to truck movements" (EIS p68) shows a total of 14 trucks will be entering Wiluna St at the intersection with Ipswich St every hour and then 15 trucks entering Lithgow St every hour. What the diagram fails to show is the 15 trucks per hour then leaving the site (once they dumped their loads) at the Ipswich St exit driveway. That means 14 additional heavy vehicle movements on Ipswich St going into the site and 15 additional heavy vehicle movements on Ipswich St when leaving the site. That is virtually double the 230 heavy vehicle movements that has been often suggested for Ipswich St. In fact it translates to 444 additional daily truck movements along Ipswich St. That's a very high number of additional heavy vehicle

movements every day, 6.5 days a week. 444 additional heavy vehicle movements per day is a very high traffic load generated by one business to be added to an already busy little street.

6. The fact that an additional set of traffic lights is proposed just for the MRF site exit driveway on Ipswich St is a strong indication that the high number of trucks exiting the site will be an unsafe situation if traffic lights are not added. 440 additional heavy traffic movements and an additional set of traffic lights within 50m of the existing lights is going to have a significant negative impact on Ipswich St traffic flow especially at peak periods. Additional set of traffic lights just for the MRF is unjustified.

7. The proposed site leaves no room for future expansion. The only option for to increase daily processing capacity output in the future is through increased hours of processing. That's an increase on 16 hours of daily operation, to 24 hours which will increase the number of heavy vehicle movements day and night. This represents incredibly poor long term planning.

8. Inadequate Safeguards for Containing Odours

The Woodlawn Bioreactor project was highly controversial, especially in regard to the shipping of waste by train. Residents of Clyde and neighbouring Auburn in Sydney opposed the project on environmental grounds and took the company to court to try to stop the project. The [New South Wales Land and Environment Court](#) ruled in their favour, finding that the transfer station would cause significant air pollution problems. There is no hiding the fact that one of the biggest problems associated with this sort of facility is the smell that will inevitably accompany the processing, transferring, storing and containerising of MSW waste. And I am far from assured by the repeated claims that all the processing at the MRF is going to be happening in a "fully sealed" or "odour controlled" building with a ventilation stack some 21 m high above the ground or 9 metres above the MRF roofline. "An odour analysis by The Odour Unit Pty Ltd determined that these mitigation measures are appropriate in containing most fugitive odour within the subject sites boundaries, with all odour being contained within the designated industrial areas boundaries" (EIS p xii). So we can be assured that most of the fugitive odour is going to be contained within the site and no odours will escape beyond the Fyshwick industrial area. The notion of a fully sealed building is relying heavily on negative pressure to keep the odour's from escaping out of the several doors that are large enough to drive a truck through. The negative pressure "will be created by using a ventilation extraction system that will rotate the entire volume of air within the building 5 times over every hour". Basically a large exhaust fan at the base of the ventilation stack will be drawing massive volumes of air into the building through the doors (to ensure odours can't escape the building) then the foul air is safely sent up the stack and into the atmosphere. This would be hilarious if it wasn't so serious. The large volume of air needed to be exhausted up the ventilation stack prevents any effective way of using filters to capture odour. The system relies entirely on the odour rising up and blowing away or dissipating into the atmosphere sufficiently to minimize the smell reaching nearby residents. The higher the stack the better, however a very tall stack is unsightly and a big reminder of why the stack is there in the first place. This stack is not very tall at all so it doesn't draw attention to the MRF. Of course stacks to draw away noxious odour's don't work 100% of the time. Just like smoke from a fire, the wind can push the large quantity of foul smelling air in any direction it blows. If there is no wind at all and the smell will linger. And occasionally on cold still mornings air temperature

inversion that can cause fog to be trapped close to the ground, can also trap smog, smoke and foul air. There is no "fully sealed" or "odour controlled" building. There is no way of fully containing the odours. The smell is going to be a fact of life with this facility. And the direction in which the smell is taken is impossible to control. Why would we risk the potential detrimental impact on Fyshwick and the surrounding residential areas by introducing a red bin waste processing facility into the middle of Fyshwick?

I fully understand the limitations of the Mugga Lane tip and need for improving our waste management system and I totally support the governments no waste initiative, however, the proposed MRF is a poorly considered, short sighted and short term solution. It's laughable that the EIS suggests this facility in Fyshwick would "promote the ACT as the new innovative and advanced waste management hub"... when actually all they will be doing is shoving the bulk of our Municipal solid waste, red bin collection, commercial and industrial wastes into containers. Its a stop gap measure to divert our rubbish away from Mugga tip and send it by rail to Woodlawn and for which we will pay heavily. It's not the best practice model of waste management and recycling that will set us up for the future.

Best Regards

A large black rectangular redaction box covering the signature and name of the sender.