

Appendix S:
Response to Submissions
Public

Public Comment Summary

Responses to all submissions have been summarised and, in many cases, the same issues were raised by many people or in pro forma responses. Specific reference to objection letters are in brackets.

The purpose of the EIS is to assess environmental impact and the focus has been on these aspects. Some people have chosen to make unsupported statements and accusation and hypothesise about other elements that are not actually part of this application e.g. Incineration. There are several issues where objectors argued the inverse of each other e.g. the Building proposed is too big and others argued that it's too small for the activity. CRS has focused on answering questions, adding clarity where required and providing supplementary information from consultants to improve the actual EIS document from when it was written, 8-10 months ago. CRS has focused on establishing the real impacts of what is proposed and have not focused on speculative issues that are outside the proposal.

CRS asked its consultants to be conservative in their assessments and the additional information is similarly conservative. CRS is seeking to make evidence-based decisions and recommendations. CRS, for example, is not responsible for the current state of traffic in Fyshwick and is not able to influence ACT traffic management policy. Yet to be seen initiatives such as East Lake (9000 people) and Dairy Flat (10,000 visitors per week) developments may have significant traffic implication in Canberra Avenue, Ipswich and Newcastle Street. Resident seem to support these proposals, without any traffic evidence or project details yet CRS, who has provided analysis will never have the same impact.

CRS has focused their responses on matters of environmental impact that may have on offsite impact. The proponents run many existing waste facilities and understand the need for onsite management practices, safety, procedures, inductions, staff and customer training, weighbridge operations, ticketing, dockets, reporting, firefighting, litter management etc. The EIS is an application that precedes the development application, and this precedes an operating licence. The details of many things that have no direct bearing on the public will be outlined in the development application (which the public can review) and then must be part of the facility licence and daily operation. The level of detail supplied to the draft EIS is for assessing impact and mitigation and can be elaborated on at the DA stage and enforced in the licensing stage.

Summary of submission types

In total, 464 representations were made through the Environment, Planning & Sustainability Directorate website. Of these, 13 submissions supported the CRS proposal and 448 submissions objected. Of the 448 objections the following applied:

- 5 objections were submitted by the same person (submission numbers 412, 418, 419, 420 and 421)
- 2 objections were unable to be reviewed or responded to due to redactions (submission numbers 171 and 232)
- 28 objections consisted of the same proforma response
- A further 128 objections followed another proforma response
- 303 objections were independent objections which did not follow a proforma

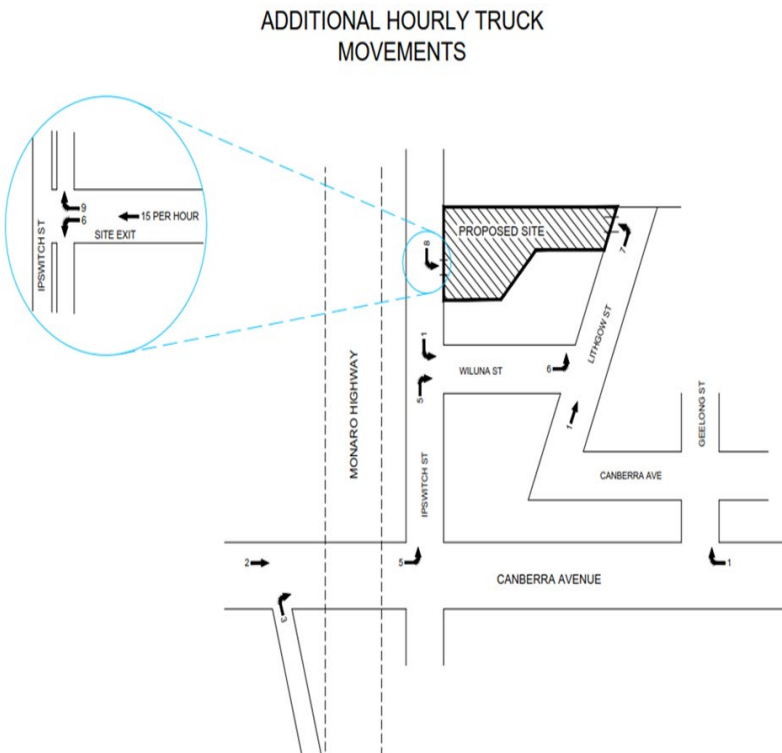
All submissions have been responded to in the below summary table. Issues have been summarised and categorised to cover common issues.

No.	Public Comment	Response	Action
1	Traffic		
1.1	Congestion (existing and new) – existing roads “too narrow” (095)	Austroads Guide to Road Design outlines recommended lane widths for various treatments. It recommends a lane width of between 3.3-3.5m for general traffic lanes width to be used for all roads. All frontage roads exceed these widths.	No action required. Refer Section 6.2
1.2	Accidents and safety (need a Road Safety Assessment) (070)	<p>A review of the crash history along the site frontage and broader area was considered and it was found that there was no significant crash history in proximity to the site. A plot of the nearby crashes showing the most recent five-year period of recorded data from January 2012 to December 2016 is shown in Figure 1. There were no fatality crashes recorded in the study area. In the broader area there were 16 injury crashes and 276 property damage only crashes recorded. Within the area, the most common crash type were rear end crashes, accounting for 62% of the crashes. Right-thru crashes at intersections were the second most common type of crash, accounting for 7% of all crashes in the study area.</p> <p>Refer Figure 28 of the Draft EIS.</p> <p>In front of the proposed site access point, there were five recorded crashes over the 2012-2016 period. Four out of the five crashes were rear end crashes. The fifth crash a vehicle veered off the carriageway, striking an object. All crashes were property damage only crashes. Three of the rear end crashes occurred on wet surface where there was heavy or light rain. The crash where the vehicle veered off the carriageway occurred on a muddy or oily surface. These would indicate that adverse environmental conditions could be a contributing factor.</p> <p>At the Ipswich Street / Newcastle Street intersection, there were 67 recorded crashes in the 2012- 2016 period. There were two injury crashes and the remaining 65 were property damage only crashes.</p> <p>The most common crash type were rear end crashes which are common at intersections but typically result in lower levels of severity. The two injury crashes were both thru-right crashes.</p> <p>At the Ipswich Street / Barrier Street intersection, there were three injury crashes and five property damage only crashes recorded over the five-year period. Two of the injury crashes were thru-right collisions and the third injury crash left turn maneuver striking an object off-road. It should also be noted that there was a head-on collision as Ipswich Street is partly</p>	See Section 6.2 of the revised EIS.

No.	Public Comment	Response	Action
		<p>undivided near the Barrier Street intersection.</p> <p>At the Ipswich Street / Canberra Avenue intersection, there was one injury crash and 61 property damage only crashes. The injury crash was a thru-right collision at the intersection. The most common crash type was rear end collisions accounting for 80% of the crashes. The injury severity of the rear end crashes could have been higher due to vehicles speeding as they are exiting the highway.</p> <p>The available data was not able to determine the vehicle classification, i.e. heavy vehicle or passenger vehicle.</p>	
1.3	Need a Traffic Hazard Risk Analysis/Truck Safety Crash Analysis and Trends (121)	As per above.	See Section 6.2
1.4	Traffic lights will create danger, speed in Wiluna St, more congestion	Extensive site surveys, site distance measurements and traffic modelling were undertaken to develop the proposed signal arrangement. Traffic signals are one of the safest intersection treatments when turning vehicles involved. The proposed signal offset from Wiluna Street will enable the two signalised intersections to work in coordination resulting in minimal impacts on queuing and delays to the network. The introduction of traffic lights will improve safety at the driveway entry. The vertical and horizontal geometry of the site allows for Safe Intersection Sight Distance for the introduction of traffic signals. The lights would operate in conjunction with the existing lights and would not expect to contribute any delays in existing travel times.	No action required
1.5	Difficult to park cars and cars get dirty (already happening in Wiluna St)	There is no parking on the frontages to the site. The parking requirements for the site are catered for internal to the site and do not contribute to the existing street parking requirements. The development of the site is not expected to contribute to this issue any more than any other potential use for the site.	No action required
1.6	Adverse impact of articulated trucks	The previous use of the site as a fuel depot incorporated the use of articulated vehicles as would many other potential uses for the site. The development intends to improve the safety of road users with the introduction of signals at the entry to reduce any existing impacts of articulated vehicles	No action required

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1.7	EIS has missed lunchtime peaks and Sat morning peak (030,121)	<p>The traffic volume profile for the area is shown in the figure below. This is based on SCATS intersection data. It compares the average weekday and weekend volumes as well as Saturday. The diagram shows the clear weekdays AM and PM network peaks.</p> <p>Refer Figure 27 of the EIS Report.</p> <p>Unlike commuter traffic where peak hours increase the demand to the development, heavy vehicles and waste collection drivers in general, avoid peak traffic times as they affect the operation and economics of operating a large vehicle. Traffic modelling and considerations used the highest volume weekday for heavy vehicle waste collection and over estimation of the expected vehicles by using the highest possible yield of vehicles waste diverted from Mugga Lane and other commercial waste. The traffic information used already represents the worst case. If the report focused on the peak periods only then we would have to report even lower heavy vehicles numbers.</p>	Added to Section 6.2.3.2
1.8	Should assess worst-case (7am-4pm) (030)	Please see item 1.7	No action required
1.9	460 traffic "movements"	A movement is a vehicle's trip to or from the site. The same vehicles could likely make several trips to and from the site. Each of these trips would be considered a movement. A truck that visits the site and then leaves the site represent two movements; one into the site and one out of the site.	No action required
1.10	Traffic numbers not accounted for (363) Metal trucks/leachate/contaminated soil	Traffic allowance were made for waste vehicles, local recycling deliveries and general freight	No action required
1.11	5% increase in traffic is statistically significant (422, 427)	5 percent is the increase in heavy vehicles representing less than 0.2% of the total vehicles during AM peak. This is based on the worst-case day and expected to be lower for the rest of the week. 0.2% is not statistically significant.	Refer Section 6.2

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1.12	Need a Pavement Impact Assessment (PIA)	The existing pavement appears to be in good condition. It would be expected that the existing pavement meets the zoning of the area and the maintenance to the roadway to fall under the responsibility of TCCS. There would be no expectation of a PIA for this project given its not changing permissible uses, and we believe it would not be necessary. It was not requested as part of the EIS scoping.	No action required
1.13	Mortality modelling (427)	Mortality Modelling would exceed the requirements of reporting the development	No action required
1.14	Effect on health – health and GHG (014)	The effect on health is not part of AECOM traffic and transport assessment scope. Traffic was considered in the Health Impact Assessment by EnRisks. There are no extra proposed trucks on the road due to this proposal and if anything, the central location may reduce the amount of distance trucks are require driving.	No action required
1.15	Failure to provide a congestion analysis (cost/benefit)	Economic analysis (cost/benefit) is not part of traffic and transport assessment scoping	No action required
1.16	Growth of traffic not assessed in the context of East lake (“9000” residents) and Dairy Flats (“10,000 visitors per week”) (121)	To date there is no public information as to how and when these numbers are realised. There is no traffic analysis showing the projected traffic impact of these numbers possibly in the future. Projected traffic analysis used to make the East Lake decision and any traffic analysis for any of the Dairy Flat land use DA’s are being sought. CRS is reusing a site that previously had significant truck movements and is not a new land release. CRS believes that the strategic planning by the ACT would already have considered the trucks from the CRS site as it was still operating as a fuel terminal when The original East Lake concept plans were under development. As these plans evolve it would be expected that the further assessment by that proponent would take place with a number of potential adjustments to traffic arrangements to cater for the additional development proposed. Importantly, our proposal is proposing an at capacity (highest use) model of 300,000 tonnes per annum. The facility will not expand beyond this range as part of forward planning, were that to be the case then CRS would need to apply through EPSDD for further capacity, possibly through an additional EIS process.	No action required
1.17	No provision for offsite queuing (366)	The internal layout of the site and intended operation is not expected to result in any traffic queue propagating from the site entries. Off-site “layby” on approach to the site is not expected based traffic forecasts.	No action required

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1.18	Bus stops on Ipswich and Wiluna Street not considered (121,366)	Given the small number of vehicles generated from staff, visitors and heavy freight vehicles (that are not waste vehicles) (section 2.5 AECOM Assessment), development traffic would not influence the operation of the bus stop.	No action required
1.19	Brick yard is obliged to close off Lithgow Street more than once a day to take deliveries (371)	It is understood that this occurs currently without supervision and consultation and the yard is south of Wiluna Street. This short-term interruption to traffic is not expected to have any noticeable impact on the performance or queueing from for the low number of vehicles entering the site given that traffic can also enter from Ipswich Street. It would impact less than 1 truck per hour.	No action required
1.20	Figure 24 does not show the trucks leaving the site – extra truck movements (462)	<p>Vehicle movements are shown in Figure 10, Section 2.6 of the AECOM traffic report. An updated Figure has been added to the EIS (now Figure 28) as below:</p>  <p>The diagram, titled "ADDITIONAL HOURLY TRUCK MOVEMENTS", illustrates the proposed site and its surrounding streets. The streets shown are Ipswich St, Monaro Highway, Willuna St, Lithgow St, Canberra Ave, and Geelong St. The proposed site is a hatched area bounded by Ipswich St to the west, Willuna St to the north, and Lithgow St to the east. Truck movements are indicated by arrows with counts: 15 trucks per hour exit the site via Ipswich St (shown in an inset), 1 truck moves from the site to Willuna St, 6 trucks move from Willuna St to Ipswich St, 1 truck moves from Willuna St to Lithgow St, 1 truck moves from Lithgow St to Canberra Ave, 5 trucks move from Ipswich St to Canberra Ave, and 1 truck moves from Canberra Ave to Geelong St. A dashed blue circle highlights the site exit on Ipswich St, which is magnified in an inset showing 15 trucks per hour exiting the site.</p>	See Section 6.2 in the EIS and Appendix E

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1.21	Extra set of traffic lights is assumed by proponent and not justified (462)	CRS would fund the lights – the impact and effect on safety has been assessed with the proposed traffic light design and it is identified as a benefit. The raw traffic data and volumes do not, technically, require the traffic lights. However, CRS believes introducing the traffic lights would make turning movements safer.	No action required
1.22	Truck movement is not the same as car and will slow the traffic flow (121)	This has been considered in our analysis. The number of trucks is not considered to significantly impact the traffic flow in the existing 60km per hour road network.	No action required
1.23	Canberra Ave service road peak is higher than am or pm (121)	The low number of additional vehicle movements from the subject site would not impact the current operation of the Canberra Avenue service road given its daily volumes and speed environment.	See Section 6.2 and Appendix E
1.24	Figure 25 should be redrawn to show number of trucks and cars across each hour of the day rather than just peaks (121)	Peak hours represent the “worst case”. Generally, all other hours would result in lower volumes and not contribute any real value to the illustration.	No action required
1.25	EIS fails to show the number of trucks bringing general freight to the terminal (121)	<p>Freight vehicle are specifically discussed in 2.5.6 of the AECOM traffic and transport assessment. It is estimated that the total number of freight vehicles generated from the site is 5 vehicles per day. SCATs data recorded on a typical weekday in September 2017 at the Newcastle Street/Ipswich Street intersection showed 972 vehicles in the AM peak and 1109 vehicles in the PM peak. Similarly, at the Canberra Avenue/Ipswich Street intersection, SCATs data indicated 3089 vehicles and 3160 vehicles in the AM and PM peak hours respectively. Therefore, the addition of 5 freight vehicles throughout the day is likely to have negligible impacts on the road network surrounding the site”</p> <p>The site will generate freight vehicles to deliver reusable material to the rail freight terminal (RFT) located at the proposed site.</p> <p>The estimated generation from the known sources likely to use the RFT is 55 vehicles per week. 25 of these vehicles are from the adjacent Access Recycling services site. The development will arrange for an internal access link to be able to transfer to the RFT without the need to use the existing road network. This reduces the freight vehicles using the road network to 30 vehicles per 6 days week or 5 vehicles per day.</p> <p>The calculations also made allowance for general freight:</p>	See Section 6.2 of the Revised EIS.

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		<p>2.5.8 Total distribution</p> <p>The total volumes and distribution of trucks shown is shown in Table 7. These numbers are based on the information from Table 4 and Table 6 and Section 2.5.6 and 2.5.7.</p> <p>Table 7 - 2020/21 Total daily volume and distribution</p> <table border="1"> <thead> <tr> <th></th> <th>Total</th> <th>East</th> <th>North</th> <th>South</th> <th>West</th> </tr> </thead> <tbody> <tr> <td>Government</td> <td>104</td> <td>22</td> <td>73</td> <td>6</td> <td>2</td> </tr> <tr> <td>Non-Government</td> <td>118</td> <td>13</td> <td>63</td> <td>39</td> <td>4</td> </tr> <tr> <td>Freight</td> <td>5</td> <td>1</td> <td>1</td> <td>1</td> <td>2</td> </tr> <tr> <td>Recycling</td> <td>3</td> <td>0</td> <td>1</td> <td>1</td> <td>1</td> </tr> <tr> <td>Daily Total</td> <td>230</td> <td>36</td> <td>138</td> <td>47</td> <td>9</td> </tr> </tbody> </table>		Total	East	North	South	West	Government	104	22	73	6	2	Non-Government	118	13	63	39	4	Freight	5	1	1	1	2	Recycling	3	0	1	1	1	Daily Total	230	36	138	47	9	
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1.26	Traffic generations does not allow for fuel deliveries, leachate removal, maintenance vehicles etc. (121)	The traffic analysis has allowed for a worst-case scenario and, should there be less than 300,000 tonnes (as ACT NoWaste is now suggesting), then the traffic generated would be less than the worst case before the facility opens. Fuel is stored onsite, meaning there would be only one delivery every two weeks. The inclusion of this delivery and periodic maintenance is statistically insignificant and more than covered in the conservative generations assumed for the general waste traffic. The leachate was to leave by shipping container and does not involve a traffic movement, if directed by the ACT EPA to pump out the leachate. This would be on an as needs basis and irregular and would go to a licensed liquid waste handler or leave the site by a trade waste agreement.	No action required																																				
1.27	Bike lane and riders on the southbound lane of Ipswich street has not been considered (121)	Road safety and pedestrian safety have been considered in the design and traffic light turning paths assessment and detail. There is no dedicated bike lane near the site. The advantage of the proposed traffic lights will improve the road safety for all users as it will help with speed. The road currently carries all vehicle and is a B-double designated truck route.	No action required																																				
1.28	Construction traffic not quantified in the EIS (121) p68	If the planning for the site is successful the proponent will prepare and submit construction traffic management plans to the required level of detail to satisfy TCCS requirements as part of the next, more detailed, design phase development for the site. This will include details on construction traffic movements, construction related traffic management plans, details on expected cut and fill to determine the amount of material to be imported or exported to / from the site. The current concept for site is looking to minimise import or export of material reducing haulage and truck movements during construction. The concrete for the site is proposed to come from the batching plants on the adjacent blocks and as such, will have a negligible impact on the broader road network for that aspect.	To be detailed in the CMP at DA stage																																				
2	Odour																																						

No.	Public Comment	Response	Action
2.1	Wiluna St residents. (50m away?)	<p>It has now been established that in 2002 the Territory permitted a subdivision and amended lease purpose clause for Block 9 Section 9 on the southern side of Wiluna Street that said the following:</p> <p>To use Units 1 & 2 for the purpose of an industry or industries (other than a noxious trade) and for any purpose subsidiary to such industry or industries AND FURTHERMORE unit 1 may also be used for the purpose of a residence;</p> <p>The site in Wiluna St retains its Industrial lease purpose clause and therefore it must be assumed that the Territory expected that the residential would exist in conjunction with Industrial activities. The residential is described as possible. While this has been raised there was no way to logically discover the existence of this lease purpose amongst the remaining Industrial and commercial businesses.</p> <p>CRS, Purdon Planning and the consultants are now aware of this possible residential property in Wiluna St and have provided additional comment. In terms of odour the “residence is on the southern side of the street it falls outside the blue odour contour that TOU considers representative of the development (i.e. stack emissions plus 5% fugitive emissions) and full compliance with the modelling criterion is still achieved.” It could be argued that living in an industrial area does not constitute a sensitive receptor. It’s quite clear that the lease purpose is definite about the use being industry or industries and part of the site “may” be used for the purpose of a residence.</p>	EIS and Consultants advised and additional comment included. No action required
2.2	21m vent will spread odour/dust across residential areas	TOU made the following comment in relation to this concern: “This is the modelled height of the stack (9m above the building height) to achieve the correct dispersion so that there are no impacts off site. The use of a ventilation stack is common practice and the stack is designed to disperse the emissions below the point where they can be detected or problematic once the plume reaches ground level. There is no reason for the stack to not to be designed to achieve the required dispersion	No action required

No.	Public Comment	Response	Action
2.3	Not properly assessed in EIS (modelling, no assessment of particulates)	The emissions and possible impacts from dust/particulate emissions have not been considered in the TOU study other than a comment stating that dust is not considered to be an issue due to the moisture content in the various waste materials being processed. This opinion is based on TOU experience at other waste transfer stations receiving predominantly municipal solid waste (MSW).	Supplementary modelling by Todoroski Air Sciences - See Appendix Q and updated Section 6.8
2.4	No filter on vent to stop dust (asbestos if missed)	The emissions and possible impacts from dust/particulate emissions have not been considered in the TOU study other than a comment stating that dust is not considered to be an issue due to the moisture content in the various waste materials being processed. Todoroski Air Sciences did assess the impact of dust and is included in Appendix Q	See above. Refer Appendix Q
2.5	Full of jargon (014)	The issues discussed are complex and the use of jargon limited to the least possible such that it can be explained correctly. Where possible CRS has endeavored to provide the simplest explanation and summary possible. The revised EIS has added a further 1/3 more content and additional detail which will hopefully provide clarity. Aspects of the development such as the Odour assessment are heavily scientific and therefore summarising can also have the impact of over simplifying which is not helpful. Efforts have now been made to add some plain English summaries where science is prevalent, and the glossary of terms has also been extended.	EIS has been updated. No action required
2.6	Modelling confusion (2.4km or 6.4km) (014)	The comment made by objector 14: " However the receptor grid includes a dimension of 0.025km (presumably 25 metres in height), while p. 11 states that assessment is of 'ground level concentrations'." This is not correct – TOU provided the following explanation that "the receptor grid dimension of 0.025 km (25m) refers to the resolution of the calculations (i.e. a calculation every 25m) and NOT the height above ground level. As such there is no inconsistency with the p11 statement that the assessment is of "ground level concentrations".	No action required
2.7	Assumed mix of rubbish "unreliable" p24	Capital Recycling Solutions carried out a waste profile analysis on actual ACT wastes, on which the data presented to TOU was based. TOU has used this waste data to develop odour profiles for the MSW, C&I and combined waste streams, by also incorporating actual specific odour emission rate data (ou.m3/sec/tonne) from an MSW transfer station in Sydney. This empirical emission data has been further verified at a second MSW transfer station, since the issue of the TOU assessment report	No action required
2.8	Odour can travel significant distances intermittently in low concentrations	This is possible and considered in the modelling. The modelling is conducted to establish compliance with the relevant standards. The application of mitigation elements is also assessed as part of the modelling to ensure that compliance can be consistently met. TOU has very conservative in its analysis to ensure that there is limited odour impacts.	No action required

No.	Public Comment	Response	Action
2.9	Separation distances should be the South Australia EPA model	<p>In the absence of a formal ACT EPA odour guideline, TOU modelling was carried out to the NSW EPA guideline odour performance criterion (OPC) of 2 odour units (ou), 99.0%-ile, 1-second averaging, for urban residential receptors. This is the most stringent criterion, where a range of 2 ou to 7 ou is specified, according to population density of potential sensitive receptors. The adoption of this 2 ou criterion for the mostly industrial receptors in the vicinity of the development site, where a 3-7 ou criterion might apply, introduces conservatism in the assessment.</p> <p>TOU approached ACT EPA verbally for guidance on the appropriate OPC for this assessment. No recommendation was forthcoming. It was decided to use the NSW EPA approach, on the understanding that it is regarded as being one of the more conservative guidelines. The EIS response from ACT endorses TOU's decision to use the NSW OPC.</p> <p>The projection of the TOU assessment is that the 2 ou criterion will be achieved within or very close to the Site boundary, and totally within the local industrial area. The basis for the NSW EPA 2 ou criterion, like all other State guideline criteria, is that compliance with the criterion, using approved dispersion modelling techniques, will result in no adverse odour impacts.</p>	See Section 6.8
2.10	No Building is fully sealed, or odour controlled	<p>The extent to which the transfer/processing building is 'sealed' has been raised – “no building is fully sealed or controlled”. It is standard practice for large buildings containing odorous processes to be constructed in a way that seals up fabrication gaps between roof and walls, and walls and floors, in a fashion that prevents fugitive air releases from the building, when evacuated with an extraction/ventilation system. The proposed odour control system will achieve 5 air exchanges per hour and a measurable negative pressure inside the building when truck doors are closed. TOU has designed effective waste industry systems using 3 air exchanges per hour.</p> <p>TOU has modelled for continuous fugitive odour emissions equivalent to 5% of the total odour generation rate within the building, despite the use of fast acting truck doors which will result in doors being open for very short durations (30 secs to 1 minute). Except for these occasions, there should be no opportunity for odorous air to escape the building.</p>	No action required
2.11	Sensitive land uses (caravan park, childcare x 3 and planned residential inside 300m)	<p>The modelling indicates that the 2 ou criterion will be achieved within or very close to the Site boundary, and totally within the local industrial area. Comments that sensitive land use receptors, such as a caravan park, child care centre(s) and planned residential areas, have not been considered ignore the modelling findings that the odour will not extend beyond the industrial area.</p> <p>The location of the proposed East lake development is discussed extensively in the EIS in Section 6.1 and has been considered in the noise and odour assessments. It is important to note that this development has been discussed for some 10 years and CRS has considered</p>	No action required

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		<p>the information available. The land at East Lake is still currently zoned industrial and the decision to potentially move residential development closer to the existing industrial land and minimize the buffer must have/or will be considered in this strategic development. In any event the proposal is visually and physically separated by the elevated Monaro Highway and CRS is designing its proposal to limit its environmental footprint to within the site as much as possible.</p> <p>The caravan park is located some xxx to the South and have been considered in the EIS and not impacted.</p> <p>There are three child care facilities listed in Fyshwick and Symonston and they are not located closer than 650m which is well beyond the 300m mentioned.</p> <p>Artemis Early Learning 11 Cessnock Street 735m Stella Bella Children’s Centre 7 Maryborough Street 650m (850m from building) Symonston Kinder Haven/Stepping Stones 22 Wormald Street 700m</p>	
2.12	Impact on food markets specifically (outdoor eating) (040)	The same comments as above for this site is some 850m away	No action required
2.13	Cited example at Banksmeadow has had numerous complaints (366)	References have been made to the Banksmeadow MSW Transfer Station, stating that this plant has caused odour problems and implying that it is not a good example. It is true that TOU verified its specific odour emission factor of 113.5 ou.m3/sec/tonne from testing at this plant. Odour problems since the commissioning of that plant were due to a combination of building fabrication problems and an initial maintenance -related high emission factor. Both issues have since been corrected and this plant is now operating effectively.	No action required
2.14	Assessment failed to consider the prevailing wind direction	The model looks at every wind direction recorded over 8,760 hrs in a year and determines how far the odour will travel for each. Then picks the 99% worst result to determine the impacts answer.	No action required
2.15	Air vent system needs to be tested and validated (366)	The same odour control apparatus and method is being used in much larger throughput facilities in Sydney	No action required
2.16	Storage of waste in shipping containers should have been assessed in the odour modelling (121)	The Odour Unit assessment did not consider as significant odour emissions from filled waste containers external to the building. According to industry best-practice, the containers will be fitted with activated carbon filters on their vents, thus minimising odours from this source.	No action required
2.17	Objector 121 Comments	The dispersion modelling examines at least one full year of hourly meteorological data, combined with hourly odour emission rate data and the physical characteristics of the	No action required

No.	Public Comment	Response	Action
		<p>system (stack height, air flowrate and velocity, topography of land etc.) and is not able to determine individual outcomes from specific plant upset conditions. It is designed to project the probabilities of exceeding ground level odour concentrations, as a percentile of a full year of hourly factors;</p> <p>The modelling was carried out to NSW EPA standards, and that for other Australian States;</p> <p>Plant upset conditions are best managed by having odour management practices that minimise the impacts from such disturbances. The OEMP addresses this;</p> <p>Temperature inversions are unable to be modelled, for the reasons given above;</p>	
3	Air Quality		
3.1	PM2.5 is second highest to Sydney already (143) will make worse	<p>Existing PM2.5 levels are described in the attached dust assessment report by Todoroski Air Sciences (See Appendix X). The dust assessment report shows the potential for dust emissions generated by the Project would be low, and when considering the prevailing background dust levels, there is no significant potential for cumulative impacts to arise.</p> <p>“Existing PM2.5 levels are described in the attached dust assessment report by Todoroski Air Sciences. The dust assessment report shows the potential for dust emissions generated by the Project would be low, and when considering the prevailing background dust levels, there is no significant potential for cumulative impacts to arise.”</p>	See Section 6.8 of the Revised EIS and Appendix Q
3.2	Cumulative air impacts – Dust from vent, emissions from trucks	<p>Truck air quality impacts are considered as part of the Todoroski Air Sciences assessment. For the vehicles travelling on-site, the proposed measures to minimise dust emissions from this activity include having all trafficked areas hardstand to reduce wheel generated dust emissions and regular cleaning of trafficked areas. Exhaust emissions can be minimised through ensuring all vehicles are maintained regularly and engines are switched off when not in use for extended periods.</p> <p>The Project site will have significant on-site queuing space and dual weighbridges to limit any on- street queuing risk. The types of trucks delivering waste to the site are sealed however there could be some residual odour from some vehicles. This odour source would be transient in nature and would not be expected to remain in one place for any extended period. We note that the Project would see a redistribution of air emissions associated with trucks along the roadways as they travel towards the Project site instead of a licensed landfill, as would occur without the Project.</p>	See Section 6.8 of the Revised EIS and Appendix Q

No.	Public Comment	Response	Action
3.3	Need to measure coarse and fine particles (028)	<p>See Todoroski Air Sciences Report in Appendix Q</p> <p>To quantify the potential dust effects, Todoroski Air Sciences was commissioned to conduct a supplementary dust assessment, which is attached. The results show low potential for dust effects to occur.</p> <p>Please note appropriate measures would be taken to manage dust levels within the working areas and dust emissions generated indoors would be captured and dispersed via the ventilation outlet.</p> <p>Enclosure of dust generating activity within a building fitted with an elevated ventilation outlet represents best practice mitigation for this type of activity.</p> <p>Ventilation outlets are commonly used in various industrial applications to promote the dispersion of air pollutants into the atmosphere. The proposed ventilation outlet will disperse emissions and reduce the overall impact at ground level (relative to no ventilation outlet); and</p> <p>Conducting the activity indoors reduces the amount of dust generated as it removes the wind generated dust arising from the material handling and processing, and surface wind erosion. Also having activity indoors slows down moisture loss and makes any misting or watering more effective at controlling the dust.</p> <p>A review of surrounding activity in the local area indicates three nearby dust generating operations on Lithgow Street (two concrete batching plants and a recycling facility). These other facilities operate outdoors, whereas the proposed Project operates indoors and would generate significantly less dust. In this context, the Project and its immediate industrial neighbours are not sensitive to dust, and the Project would contribute a low quantity of dust into the environment, indicating that the Project is suitably positioned. The assessment by Todoroski Air Sciences shows the ground level dust concentrations due to the Project are low and cumulative dust impacts would not arise due to the operation of the Project this location.</p> <p>Based on the design of the ventilation outlet and the likely small scale of dust effects, filtration is not a justifiable control measure in this case.</p> <p>Existing PM2.5 levels are described in the attached dust assessment report by Todoroski Air Sciences. The dust assessment report shows the potential for dust emissions generated by the Project would be low, and when considering the prevailing background dust levels, there is no significant potential for cumulative impacts to arise.</p>	See Appendix Q


No.	Public Comment	Response	Action
3.4	Impact if the ventilation fails	Appropriate safeguards will be in place to ensure the likelihood of ventilation failure is reduced where practicable. This includes regular maintenance of ventilation equipment and having replacement ventilation equipment on hand. The Odour Unit has nominated that there will be two variable speed fans operating at 75% capacity so there will be opportunity to conduct regular and emergency maintenance activities while the other fan remains in operation. Key spare parts will be on-site to minimise shut down risks.	See Section 6.8 of the Revised EIS and Appendix Q
3.5	Daily train emission impact not measured (idling locomotives)	<p>The anticipated rail movements associated with the Project would be one train arriving and leaving per day on average. The potential air emissions associated with the train exhaust from one train per day is not considered a major source of any air quality impacts.</p> <p>For example, we note that train passing loops can operate near sensitive receptors (<100m) without impact. In the situation of the Project site, the nearest existing sensitive residential receptors are approximately 450m away (Wiluna Street caretaker is some 250m), hence there would be no potential for impacts from train exhaust emissions associated with the Project.</p>	No action required

3.6	Vent system is not filtered – will send out dust	<p>It should be noted that most of the dust generating activities will occur indoors. These activities include loading and unloading material, processing and handling of waste material. The dust producing activity that occurs outside is vehicle movements. These vehicles would be travelling slowly and on sealed roads, thus it would be relatively easy to control any excessive dust by occasional cleaning/sweeping or watering of the surface.</p> <p>To quantify the potential dust effects, Todoroski Air Sciences was commissioned to conduct a supplementary dust assessment, which is attached. The results show low potential for dust effects to occur.</p> <p>Please note appropriate measures would be taken to manage dust levels within the working areas and dust emissions generated indoors would be captured and dispersed via the ventilation outlet. Enclosure of dust generating activity within a building fitted with an elevated ventilation outlet represents best practice mitigation for this type of activity.</p> <p>Ventilation outlets are commonly used in various industrial applications to promote the dispersion of air pollutants into the atmosphere. The proposed ventilation outlet will disperse emissions and reduce the overall impact at ground level (relative to no ventilation outlet); and,</p> <p>Conducting the activity indoors reduces the amount of dust generated as it removes the wind generated dust arising from the material handling and processing, and surface wind erosion. Also having activity indoors slows down moisture loss and makes any misting or watering more effective at controlling the dust.</p> <p>A review of surrounding activity in the local area indicates three nearby dust generating operations on Lithgow Street (two concrete batching plants and a recycling facility). These other facilities operate outdoors, whereas the proposed Project operates indoors and would generate significantly less dust. In this context, the Project and its immediate industrial neighbours are not sensitive to dust, and the Project would contribute a low quantity of dust into the environment, indicating that the Project is suitably positioned. The assessment by Todoroski Air Sciences (See Appendix Q) shows the ground level dust concentrations due to the Project are low and cumulative dust impacts would not arise due to the operation of the Project this location. Based on the design of the ventilation outlet and the likely small scale of dust effects, filtration is not a justifiable control measure in this case.</p>	See Section 6.8 of the Revised EIS and Appendix Q
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No.	Public Comment	Response	Action
3.7	Impact of the air inversion (124)	The air dispersion modelling for the Project used the CALMET meteorological model which produces three-dimensional gridded wind and temperature fields that simulate the potential effects of temperature inversion. The modelling predictions for the Project include consideration of these effects.	No action required
3.8	Contaminated soil during construction	During construction of the Project site, any contaminated materials identified at the site will be appropriately managed through a remediation plan and hence air quality impacts are not expected during construction. Construction dust mitigation measures that would be employed during the construction of the Project to limit dust emissions include: Wet suppression would be used during earthworks to minimise dust being raised. The volume of water applied would be managed so as not to create potentially polluted run-off; Vehicles will only leave the site via established and stabilised access points; Equipment will be fitted with relevant dust suppressors; and Temporary wheel bath will be installed for the construction period.	Detail for the CMP at DA stage.
3.9	Consider impact of dust misting system in the shed	Dust misting sprays would be used with the enclosed building to manage dust levels within this space and would reduce the amount of dust generated and hence lead to a reduction in potential dust impacts. It is indicated that deodoriser sprays could be installed which activate when the fast-acting doors to the building open. These sprays would also be able to mitigate and minimise fugitive emissions of dust leaving the building from this opening.	Detail for the DA stage
3.10	Indoor air monitoring must be imposed (121)	The provisions of the ACT Work, Health and Safety Act 2011 (WHS) specifically provide for the regulatory obligations, rights and requirements to ensure worker safety. Indoor air quality monitoring is used to determine worker exposure to pollutants and will form part of the site's occupational health and safety program. The composition of air within the building would include emissions associated with loading/unloading material, processing and handling of material and vehicle exhaust emissions. The building ventilation system has been designed to provide five air changes per hour to supply adequate fresh air within the building.	Licensing stage
3.11	BTEX, VOC and PAH vapours from contaminated soil and water (121)	It is proposed that the EMP will be updated and incorporated into both the final CMP and OEMP. The EMP will take into account actual contaminants that arise from any excavations and determine the correct actions and safe handling and storage depending upon testing outcomes during construction. The final remediation plan will be developed as part of the EMP and will be part of the final design detail submitted at the DA stage. These documents will need to be reviewed by ESPDD and ACT EPA.	DA and Licensing stage

No.	Public Comment	Response	Action																																				
3.12	Assessment of the carbon footprint of the total development missing (121)	<p>CRS has addressed the role waste management plays in the ACT Climate change strategy (see Section 4.3). There are various Strategies that discuss Climate Change, and these are the ACT Climate Change Strategy AP2 2012 and it is also addressed in the ACT Waste Management Strategy 2011-2025. The clear focus from these Strategies is to address the production of methane gases by removing organic wastes from landfill and:</p> <ol style="list-style-type: none"> 1. avoid products becoming waste (reduce and reuse) 2. find an alternative use for waste (recycle and recover), and 3. ensure safe and appropriate disposal as a last resort. <p>CRS understands the waste hierarchy and its proposal is not designed to interfere with any program designed to avoid the production or recycling of waste. Minimising of the waste to landfill, in both short and long-term strategies achieve the same outcome. Removing the inevitable methane leakage and finding alternative uses for materials can occur for an additional 20% of the material currently going to landfill. Removal of short-term greenwaste and potentially long term, food waste will have a significant impact on the production of landfill methane but will also inhibit the production of electricity currently sourced from this methane.</p> <p>TABLE 1 GREENHOUSE GAS AND WATER SAVINGS FROM RECYCLING</p> <table border="1" data-bbox="693 878 1581 1247"> <thead> <tr> <th>Type of material</th> <th>Tonnes recycled 09–10 A</th> <th>water saving per tonne (KL)</th> <th>Water savings (kL) B</th> <th>GHG saving per tonne</th> <th>GHG emissions savings (tCO₂-e)</th> </tr> </thead> <tbody> <tr> <td>Paper</td> <td>51224</td> <td>15.58</td> <td>798,000</td> <td>1.54</td> <td>79,000</td> </tr> <tr> <td>Timber</td> <td>47543</td> <td>0.07</td> <td>3,000</td> <td>0.15</td> <td>7,000</td> </tr> <tr> <td>Glass</td> <td>16783</td> <td>2</td> <td>34,000</td> <td>0.33</td> <td>6,000</td> </tr> <tr> <td>Aluminium</td> <td>2319</td> <td>233.2</td> <td>541,000</td> <td>15.80</td> <td>37,000</td> </tr> <tr> <td>Steel cans</td> <td>1026</td> <td>1.1</td> <td>1,000</td> <td>0.81</td> <td>1,000</td> </tr> </tbody> </table> <p>A – Figures provided by Territory and Municipal Services Directorate, ACT Government.</p> <p>B – Figures from GHD (2009) 'Waste Technology and Innovation Study' for the Department of the Environment, Water, Heritage and the Arts (DEWHA) at http://www.environment.gov.au/settlements/waste/publications/waste-technology.html.</p>	Type of material	Tonnes recycled 09–10 A	water saving per tonne (KL)	Water savings (kL) B	GHG saving per tonne	GHG emissions savings (tCO ₂ -e)	Paper	51224	15.58	798,000	1.54	79,000	Timber	47543	0.07	3,000	0.15	7,000	Glass	16783	2	34,000	0.33	6,000	Aluminium	2319	233.2	541,000	15.80	37,000	Steel cans	1026	1.1	1,000	0.81	1,000	see Section 6.8.3.3 of the revised EIS
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No.	Public Comment	Response	Action
		<p>It should be noted from the extracts above and the table above that the removal of paper, timber, glass, aluminium and steel cans are all positive in terms of greenhouse gas and water savings. All these materials (and others including green waste) are proposed to be recycled by CRS as indicated in Table 1 of the EIS. Of course, CRS is proposing to recycle other materials such as concrete and inerts, plaster board and other metals where there is production saving in the cost to the environment of mining raw materials to replace those that can be reused.</p> <p>On 18 September 2018 when the Legislative Assembly passed the Climate Change and Greenhouse Gas Reduction (Principal Target) Amendment Bill 2018 to amend the zero net emissions target in the Climate Change and Greenhouse Gas Reduction Act 2010 (ACT). The bill proposed to reduce the principal target of zero net emissions from 2050 to 2045.</p> <p>The ACT Climate Change Strategy “To a Net Zero Emissions Territory” Discussion Paper released to promote this amended target was introduced in December 2017 and discusses the following in relation to waste management:</p>	

No.	Public Comment	Response	Action						
		<p data-bbox="703 245 1081 337">Figure 3: ACT emissions in the 2015–16 Greenhouse Gas Inventory, showing electricity and transport as the major contributors to our emissions</p>  <table border="1" data-bbox="709 787 1102 958"> <tr> <td>55% ELECTRICITY</td> <td>3% WASTE</td> </tr> <tr> <td>27% TRANSPORT</td> <td>5% INDUSTRY</td> </tr> <tr> <td>9% GAS</td> <td>1% OTHER (FUEL OIL, WOOD FUEL AND NATURAL GAS LEAKAGE)</td> </tr> </table> <p data-bbox="678 1036 1201 1060">Source: "To a Net Zero Emissions Territory" p.12</p> <p data-bbox="678 1101 1633 1157">The Waste industry contributes some 3% of the total emissions and this has largely been identified as the breaking down of organic waste at landfill.</p> <p data-bbox="678 1198 1665 1287">Key targets of the discussion paper are to remove emissions from solid waste (divert organics, achieve higher recovery rates for MSW, C&I and C& D wastes), best available land fill capture technology</p> <p data-bbox="678 1328 1612 1417">CRS is proposing to contribute directly in all these strategies and any residues going to Woodlawn are going to an excellent and purpose designed landfill that has been an engineered landfill with capture technology since day 1 of operation.</p>	55% ELECTRICITY	3% WASTE	27% TRANSPORT	5% INDUSTRY	9% GAS	1% OTHER (FUEL OIL, WOOD FUEL AND NATURAL GAS LEAKAGE)	
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No.	Public Comment	Response	Action
4	Heath Impact		
4.1	Children, Medical conditions	<p>The HIA has considered the operation of the proposed project and potential impacts to the health of the off-site community. The assessment has considered a range of issues that have the potential to affect the health of the community (either positive or negative), which relate to changes to noise, hazards (including fire, hazardous waste and bushfire risks), air quality, odour, traffic, visual landscape, pestilence, contaminated land, economic and social environment.</p> <p>Based on the assessment undertaken, the project is associated with some benefits to the community, particularly in relation to employment. Where negative impacts have been identified, these are considered to be negligible in terms of community health due to the suggested and proposed process design, control, mitigation and management measures to be implemented.”</p>	See Section 6.8 of the EIS and Appendix L
4.2	Truck fumes (not assessed) and particulates from construction and operation (121)	<p>These have now been considered in a supplementary assessment by Todoroski Air Sciences – See Air Quality</p> <p>“Truck air quality impacts are considered as part of the Todoroski Air Sciences assessment. For the vehicles travelling on-site, the proposed measures to minimise dust emissions from this activity include having all trafficked areas hardstand to reduce wheel generated dust emissions and regular cleaning of trafficked areas. Exhaust emissions can be minimised through ensuring all vehicles are maintained regularly and engines are switched off when not in use for extended periods.</p> <p>The Project site will have significant on-site queuing space and dual weighbridges to limit any on-street queuing risk. The types of trucks delivering waste to the site are sealed however there could be some residual odour from some vehicles. This odour source would be transient in nature and would not be expected to remain in one place for any extended period.</p> <p>We note that the Project would see a redistribution of air emissions associated with trucks along the roadways as they travel towards the Project site instead of a licensed landfill, as would occur without the Project.</p>	See Section 6.8 of the EIS and Appendix Q
4.3	Temperature inversion	<p>This cannot be modelled for odour (see odour comments), this will not change noise levels at boundary levels which is the assessment criteria.</p> <p>The air dispersion modelling for the Project (Todoroski) used the CALMET meteorological model which produces three-dimensional gridded wind and temperature fields that simulate the potential effects of temperature inversion.</p> <p>The modelling predictions for the Project include consideration of these effects.</p>	See Appendix Q

No.	Public Comment	Response	Action
4.4	Short and long-term impacts	<p>The HIA prepared by EnRiskS has considered the operation of the proposed project and potential impacts to the health of the off-site community. The assessment has considered a range of issues that have the potential to affect the health of the community (either positive or negative), which relate to changes to noise, hazards (including fire, hazardous waste and bushfire risks), odour, traffic, visual landscape, pestilence, economic and social environment.</p> <p>Based on the assessment undertaken, the project is associated with some benefits to the community, particularly in relation to employment. Where negative impacts have been identified, these are considered to be negligible in terms of community health due to the suggested and proposed process design, control, mitigation and management measures to be implemented</p>	Refer Appendix L and section 6.12 of the EIS
4.5	Working in the shed and construction risks from contamination	This will be addressed in the CMP and OEMP at DA and Licensing stages. It is the intention and requirement to offer employees a safe work environment. The remediation of hydrocarbon affected sites is not unique and the re use for industrial purposes is achievable as proposed. The management of the earthworks, and the construction of the MRF building and vapour barrier will need to meet the various standards in detailed design and shown that risk to construction workers and MRF employees has been mitigated.	DA design/Licensing stage
4.6	Does not reference the previous HIA done by Shell in 2011 and its baseline data (121)	<p>The HIA prepared by Shell was not applicable to the operations proposed on the subject site.</p> <p>Block 9 has already been the subject of significant site investigations and remediation works since 1999. The site has had a much longer history as a petroleum depot and the effort to determine and remediate the impact of that history are extensive and have been reviewed by WSP.</p> <p>1999 Woodward Clyde Preliminary investigation of Shell Canberra depot 1999 PPK Environment Phase 2 site assessment 2004 IT Environmental Canberra depot stockpile sampling 2005 IT Environmental Site assessment report 2006 IT Environmental Site assessment report 2006 Coffey Environments Factual groundwater monitoring event 2007 Coffey Environments Factual groundwater monitoring event 2007 URS Human health and environmental risk assessment 2008 ENSR AECOM Comprehensive environment site assessment 2010 AECOM Delineation environmental assessment 2011 AECOM Human health and environmental risk assessment</p>	No action required.

No.	Public Comment	Response	Action
		2017 ECS Environmental management plan (EMP) 2017 GHD Independent site audit and audit statement 2017 WSP Current EIS assessment – Remedial Action Plan (RAP)	
		Assessment of the historical context and the potential for the proposal to impact on the current soil and geological situation has been considered during the design and planning phase of this project. Given the site was previously utilised for petroleum storage, it is likely that there are some residual pockets of deep contamination from the petroleum activities. The historical site investigation, remediation and monitoring deem these pockets of contamination to be stagnant and remain periodically tested as part of the long-term remediation plan.	
4.7	Health impacts of hydrocarbons outdoors	This has been considered by WSP. WSP have proposed the development of a Remedial Action Plan (RAP) which will include monitoring and mitigation measures for the purpose of protecting the environment and dealing with avoiding the risk of hydrocarbon impacts on health. The RAP will include a final remediation plan with soil management procedures and testing for example and the inclusion of design features such as a membrane under the MRF building to prevent latent hydrocarbon penetration. An Environmental Management Plan (EMP) would be updated and included as part of the Construction Management Plan and Operating and Environmental Management Plan (OEMP) to ensure that construction and operating procedures are incorporated to deal with this aspect. The CMP and OEMP will be given to ACT EPA and ACTPLA prior to the licensing process.	See Appendix G and Section 6.6 of the EIS document. This CMP and OEMP at the Licensing stages
4.8	Pathogens from waste handling	Todoroski have assessed that the waste pathogens at the Project would be no different to those encountered in domestic household bins. The building enclosure at the project would be under negative pressure	See Appendix Q
4.9	Gases from decomposition of waste – fire or explosion risk?	See Fire risk comments in Section 6.11. Air is exchanged in the building 5 times per hour to limit this risk and staff health risk. The design of the facility is to move waste through and not store it. Decomposing waste will be organic in nature and it has a separate sorting process. The risk of explosion is negligible due to air change and the close observation of the waste as it arrives. The risk of fire is also mitigated by the installation of fixed automatic heat sensitive firefighting systems with manual equipment as well.	See Sections 6.8 and 6.11 in the EIS and Appendix K
4.10	Long term effects on staff from vapour intrusion (121)	The purpose of the vapour barrier is to prevent intrusion as would the floor slab and any other impervious layers during construction and/or contaminant removal	No action required
5	Stage 2 Incinerator		
5.1	The ACT has no WtE Policy currently	The Waste Feasibility roadmap recommendation 1.10 outlines the need for the development of a WtE policy. If the roadmap is read as such then the WtE policy is not a priority.	No action required

No.	Public Comment	Response	Action
5.2	The Scoping Application in November 2017 includes references to stage 2 incineration in its introduction	The mention of WtE in the MRF scoping was in the introduction to describe the journey to that point and not infer it had not been part of an earlier scoping that was superseded. The original scoping and project discussion involved an MRF, Rail Freight Terminal and a Waste to Energy plant. A final EIS has never been submitted for this proposal. As a result of community consultation, it was determined quickly that firstly a smaller WtE plant might be better received, it was halved in size. In the wake of public opinion and the lack of clear direction from Government, or from the market sounding process, it was determined that WtE be removed from the project and it would be subject of a separate application process, if at all. Contrary to CRS's belief that the project, now significantly reduced could be submitted under the existing scoping, the EPSDD requested that a completely new scoping be submitted for the revised proposal (with WtE removed). This occurred in late Oct 2017 and the revised scoping was submitted in late November 2017 and the EPSDD response with its scoping response in January 2018. Objections to the proposal based on this application including WtE, incineration or any elements/impacts involved with those activities are not being addressed as they are not part of the MRF application therefore not relevant. The applicant has stated that WtE is not part of this application and there has been no progression of this aspect. It should be noted that the newly released Waste Strategy, that is referenced extensively by objectors has indicated that a WTE policy would be formulated in the future.	No action required
5.3	Original WtE scoping is still valid till Jan 2019 and could be acted upon	The original scoping (Application 201700023 – 30 June 2017) was valid for 18 months and has now expired.	No more action required
5.4	Request new scoping without reference to WtE (029)	EPSDD has managed the process and clearly understands in its scoping response that there is no incineration included in the scoping request or the MRF EIS application and assessment	No action required
6 Litter & Vermin			
6.1	Will increase vermin	Section 6 of the EIS discusses Vermin and Pest management and includes mitigation measures. It should be stressed that this is not an open-air waste facility like most in the Territory. This is not a landfill where it is difficult to contain smell, and pests and vermin. This is a fully enclosed and sealed building such that the environment inside the building can be managed to the exclusion of the outside. Most buildings do this with their air conditioning and heating systems and use insulation and sealed structures to manage the temperature etc. The Fyshwick Food Market could be a similar attractor potentially of pest and vermin and no doubt have management systems in place to prevent vermin and pest. Programmed pest management would be part of the OEMP as it would be for many other large food handling facilities. Bins in back lanes and outside houses are more prone to the	See Section 6 of the EIS

No.	Public Comment	Response	Action
6.2	Will generate windborne waste	<p>risk of pest and vermin. CRS has focused on creating a design to eliminate those risks.</p> <p>The EIS describes the risk of the spread of waste to other sites (litter) in Section 6. The response to this is already contained in 6 where mitigation of this risk is discussed.</p> <p>Vehicles delivering waste to the MRF are required to be sealed and/or covered. Any trucks are not allowed under their operating license conditions to allow rubbish to fall out on the way to the MRF Vehicles at the MRF will uncover and unload within the building which will have automatic opening and closing doors. The wind will not be a factor as activities will occur inside the building.</p> <p>Waste is stored inside the building until it is either bales and load into containers or containerized and then sealed for transport.</p> <p>Separately the site will be regularly maintained for cleanliness and swept as would other businesses as part of the Operating and Environmental Management Plan (OEMP)</p>	See Section 6.4 in the EIS
6.3	Not treated seriously enough in the EIS – “say so” is not enough	<p>This risk aspect has been added to in the body of the EIS. No waste is stockpiled externally to the building. The building has limited entry and exit points with rapid closing doors. The design features of the building incorporate specific elements such as the doors and a sealed environment which will manage vermin and wind risks as well as odour and noise risk. The proposal is currently an EIS and the key commitments discussed will need to be reproduced in a development application which would condition the design and operating consent. This conditional approval is then part of the facility licencing which ensures that ‘say so’ is enforced if required. CRS is interested in being a good neighbor and creating avoidable risks with good design is desirable.</p> <p>Will be included in the OEMP and evidence of processes will be provided to obtain a facility licence.</p>	DA and Licencing stage
6.4	Daily litter collections inside and outside the site boundary	<p>Already proposed in the EIS (see p108) and will be included in the OEMP required for licencing.</p> <p>Site maintenance and cleaning will be part of the OEMP and this will be ratified through the facility licence. CRS has designed the building so that waste will not escape.</p>	DA and Licencing stage
6.5	lack of perimeter fence	Existing fencing in place and will be replaced or renewed such that the site is secure. There will be a noise wall on the southern side – (this is not possible on the rail side (north) and the MRF building itself will be lockable for security purposes	DA stage
6.6	All incoming and outgoing loads must be covered	This is the responsibility (and licence condition) of waste transporters and will be a condition of entry and of the facility licence. All customers will be account customers and there bound by operating practices and conditions and this is already standard waste	Licence and induction stage

No.	Public Comment	Response	Action
		<p>transporter practice which CRS would reinforce with its customers.</p> <p>CRS will also apply for a transporters licence as it will be transporting materials by road and rail to local markets. Most material is moved in sealed shipping containers. Any loose material (soils, greenwaste etc). would be transported in covered vehicles as per the required licence.</p>	
6.7	All trucks and containers should be leak proof	<p>Specially designed waste shipping containers for this project and are required and proven to be watertight and airtight. The container design proposed is already in daily use by Veolia and has been for many years.</p> <p>The collection trucks targeted are the current trucks collecting waste and are already driving the streets of Canberra and subject to their own operating and licence conditions.</p>	No action required
6.8	The doors should be oriented to avoid winds	The building is already designed on one face to eliminate through breeze in the shed. The orientation is away from Narrabundah and East lake and towards the centre of the site There is one door for containers on the North face to access the RFT	No action required
7	Hours of Operation		
7.1	24/7 operation.	The EIS is quite clear that the hours of operation proposed are from 6.00am till 10.00pm Monday to Saturday and 8.00am till 2.00pm on Sundays. The claim that it is a "24/7" operation is factually wrong.	No action required
7.2	Really operates between "7am-4pm"	Some objectors have claimed that the effective hours are between 7.00am and 4.00pm. This is based on the collection of domestic waste (30% and possibly less of the total waste stream). While the current hours are driven by the hours of operation of the landfill this does not have to remain the case. Changing the hours of operation will actively reduce the traffic congestion impact over time. Commercial operators will be looking for their trucks to be the most efficient and spend the least amount of time in traffic. The second aspect to the hours of operation which has eluded commentary is that the processing of material for recyclables will be done in shifts and is independent of the collection trucks. To be able to sort material effectively and not just "transfer" it the proposed hours of operation are necessary.	No action required
8	Fire Risk		
8.1	Previous fire incidents at recycling facilities (Beard, Mugga, Pialligo, Newcastle – NSW stats (411)	All the fire incidents cited are from different waste streams (Access and are either open air facilities without in-situ firefighting systems. The Benedict Newcastle facility is a converted shed that had some issues with a specific "hot" load waste stream that has now been excluded. The facility at Newcastle was originally approved at 90,000tpa. This facility has now received approval from the Department of Planning, EPA and Fire Services to increase its processing volume to 315,000tpa (bigger than CRS)	See Section 7.1. Expert report at Appendix K

No.	Public Comment	Response	Action
		<p>It is worth noting that Benedict Recycling has developed an in-situ thermal camera fire prevention system for its enclosed facilities (See Appendix X). Benedict has invented the system and has it installed for trials in its Unanderra facility and is next being installed in Newcastle and then the other Benedict facilities’.</p> <p>The system is an automated back stop in case something is missed in the receipt and sorting phases. It is not intended to stockpile waste so the time it is in the facility is already reduced. In the event of there being any (the locations are already identified in Figure 10 of the EIS) rise in temperature of a stockpile the automated fire system operates as follows: A rise in stockpile temperature beyond 68 degrees is identified by fixed thermal cameras (Cameras can “look” 6m deep into a stockpile) Water Cannon/Sprinkler is triggered to target the stockpile and drench the hotspot. The camera assesses the temperature constantly and will repeat the process if necessary. System triggers phone alerts to management There is no incentive to overly wet the stockpiles as it is harder to process and creates leachate. The prevention of inappropriate waste acceptance is key, and the technology is used as a backstop.</p> <p>Together, the risk of fire is minimised and therefore fires, and business shut down is avoided.</p>	
8.2	Specific Fires at Access Recycling (metal recycling issues)	<p>All but 2 of the fires were extinguished before ACT Fire & Rescue arrived. One large fire was in a pile of mattress springs that were delivered from the ‘soft landing’ project operated at the Hume Prison. The material is highly flammable and problematic. Access do not take delivery of it anymore, and it is believed that it now goes to landfill. The other large fire was when a hybrid car was compressed in the car baler. Access understood that all the batteries had been removed. It was later learnt that some hybrid manufactures install batteries in several locations throughout the vehicle, not all of which are apparent to recyclers. If a package of batteries is not identified and removed before the car is further processed or baled, when the batteries are compressed, they can cause a large fire. The metal recycling industry is currently struggling with this issue and as a result many recycling companies, including Access Recycling, Sims Metal and GRI (the three largest metal recyclers in the region) no longer accept hybrid or electric vehicles for recycling.</p>	No action required

No.	Public Comment	Response	Action
8.3	Not adequately addressed in EIS – need fire risk assessment	<p>The information provided in the EIS was enough for the risk and planning section of the ACT Emergency Services Agency to state the following:</p> <ul style="list-style-type: none"> • “That the proposal is supported” • “The location of the proposed development indicates that the ACTF&R will be able to maintain operational response to the area and its surrounds” • “Compliance to the National Construction Code and inbuilt fire safety systems are outside the scope of this document and will be assessed separately by ACTF&R Fire Safety Section ant the building approval stage” 	No action required
8.4	Impact of toxic fumes	<p>To minimise the risk of a fire event is to minimise the risk of any smoke for fumes. It is theoretically possible for any building in Fyshwick (and its contents) to catch fire. Unabated large fires could develop. In the context of waste facilities, Benedict Newcastle, which was cited in objections – there were no evacuations of the neighbouring properties due to the fires or impacts from them. It needs to be pointed out that most fires that have occurred in waste facilities are in open air facilities that stockpile significant material. There have been several metal recycling facility fires (which involve fuels and oils and electric battery issues) and domestic recyclable MRFS (which store significant paper and plastic). This proposal is neither of those and is not proposing storage outside. The CRS proposal is purpose built and will incorporate automated thermal cameras to identify abnormal temperatures and any possible fire event before it becomes something toxic.</p> <p>Todoroski Air Sciences makes the point that “there will be a range of measures implemented to prevent the event of a fire at the Project and the potential release of toxic fumes. These measures include:</p> <ul style="list-style-type: none"> • Back to base fixed smoke and fire alarm systems within the building; • Portable and fixed thermal cameras to identify significant heat change in waste stockpiles; • Fire warning systems and fire exits; • Fixed fire hoses; • Water and foam sprinklers; • Fixed zoned sprinkler system; and • Machinery sprinklers where appropriate.” <p>The fire risk for CRS is no greater that it would be for the risk of fire in individual residential and commercial bins. The difference is that at CRS the environment is designed for fire prevention. This is not the case in open air waste facilities or non-purpose designed building.</p>	See Air Quality Assessment in Q

No.	Public Comment	Response	Action
8.5	Lithium batteries	Lithium batteries can be a source of fire whether they are in the rubbish stream or not – if they are secreted in the rubbish currently then they are a risk at Mugga Lane currently. By the waste processing proposed, they will be separated out and sent for recycling not landfilled as is occurring now	See Section 6.4.3
8.6	“low risk” assessment in EIS is wrong	CRS believes that without mitigation the risk is “medium”. With the in-situ firefighting system couples with correct receipt procedures and the implementation of thermal cameras linked to fire extinguishing apparatus that the risk is now “low”. This has been amended in Section 6.11 of the EIS. The risk of fire is certainly more able to be prevented and controlled than in a landfill or open-air waste facility environment	See Section 6 and appendix K.
8.7	FOY Inquiry Hearing – future fire risk ruling (333)	The Foy proposal was exclusively a plastic to diesel concept. The waste proposed to be processed through CRS is the same waste that is tipped directly into Mugga Lane now. The risk of fire would not be any different in terms of material received (Mugga receives other special wastes over and above) and by the operating space being always defined within the building the best firefighting prevention resources can be installed and utilised. Comparing CRS to other facilities that are not comparable in operation or fuel is erroneous. CRS will not be storing waste so the risk of waste causing a fire is greatly reduced.	No action required
9	Bird Strike		
9.1	Risk (397)	Canberra Airport has formally responded and by the “fully enclosed design and that, most importantly, there will be no waste stored outside the MRF building unless it is containerised in waterproof shipping containers; thereby negating the risk of attracting birds to the area. On this basis, Canberra Airport has no objection to the proposal.”	See Appendix U
9.2	Should provide additional wildlife risk report (014)	The Conservator’s office advised there are not any major flora or fauna issues and will not impact on any native communities or species (advice was in both the scoping and EIS responses from the Conservator’s office)	No action required
10	Noise		
10.1	EIS does not quantify the sources and noises that impact on the site (121)	Quantifying noise sources is not required but it was done by Rudds. The site is an industrial location and any external sources that impact the site are irrelevant as it is the noise generated by the proposal at the boundary that is measured. Road traffic was assessed at the site as being the primary noise from nearby locations.” Proposed CRS noise sources on the site were identified in Table 11 - Appendix J TABLE 11 EQUIPMENT NOISE LEVELS Equipment Lindner Jupiter Shredder Lp 86.2 dBA at 3 metres Lindner Ecostar Dynamic Screen Lp 86.2 dBA at 3 metres	No action required

No.	Public Comment	Response	Action
		<p>Waste Compactors (2 of) SIS (US) 4500 EX Lw 112 dBA Front End Loader. Volvo L150 or CAT 966 or Equivalent Lw 111 dBA 2 tonne Gas Powered Forklift Lw 98 dBA Container Handler – Clark Equipment Omega 54 (or similar) Lw 110 dBA Delivery Trucks Lw 98 dBA Air extraction and filtering equipment associated with the building. Fantech 45 kW fan or similar. Lw 93 dBA - Fan 81 class locomotives (or similar) Lw 100 dBA</p> <p>An assessment of operations at the site has been undertaken based upon the following operational scenarios:</p> <ol style="list-style-type: none"> 1. Daytime operation will include receipt of waste and train loading and unloading activities and operation of the MRF. This includes a single locomotive located near the western end of the site at the rail siding, container handler and trucks entering and leaving the site and trucks at weighbridges (3 trucks every 10 minutes assumed). 2. Night-time operations (hereafter referred to as the morning shoulder period from 6 am to 7 am) will involve operations within the MRF building and receipt of waste (approximately 1 truck every 10 minutes expected) only and no other external operations will occur. There will be no train loading during the night-time period. 3. There will be no site operations occurring between 10 pm and 6 am. 	
10.2	Noise of unloading, reversing beepers, scraping of concrete	All activities of unloading and reversing occur inside the MRF building. The design of the building, incorporating rapid closing building doors and designed to be leak proof for both noise and odour will mitigate the noises suggested.	No action required
10.3	Should have considered difference between intrusive and annoying noise	There is no requirement to do this assessment in the ACT. "The MRF building can be constructed to minimise noise emissions to the environment, thus achieving compliance with the ACT Zone Noise Standards at the property boundaries." Appendix J p24	No action required

No.	Public Comment	Response	Action
10.4	Without construction detail can't claim it will meet ACT noise standards	The ACT Environment Protection Regulations require Construction noise to comply with the noise zone standards between the hours of 6am and 8pm. It can be exceeded but must comply outside of that band of time. There are no prescribed levels during the construction day (clause 2.4.1)	No action required
10.5	Monitoring over 7 days is inadequate for a project of this size – should have included all weather conditions	This is not necessary in the ACT. In NSW, monitoring over 7 days is used to determine noise limits. This is not the required method in the ACT, which has a set of noise limits. Short-term monitoring was conducted at four locations and long-term monitoring (7 days) was conducted at the Canberra South Motor Home. The monitoring data shows consistent results.	No action required
10.6	Temperature inversions not considered	Temperature inversion will not change the noise levels at site boundaries, which is the compliance point required in the ACT. The specific equipment has been assessed at the boundary and the appropriate mitigation recommended as is required.	No action required
10.7	Impact on other suburbs not assessed	If the noise is measured and acceptable or at least mitigated at the boundary of the site, then measuring further away is not necessary. Strictly speaking there is a requirement to assess at the site boundary. Rudds has extended this to existing residential and future residential, so we have already gone beyond what is required.	No action required
10.8	Truck noise – air brakes	The impact of truck air brakes was included in the measured truck noise.	No action required
10.9	Truck movements on site	Truck movements were assessed onsite and the mitigation measure of building a noise fence on the southern boundary was a direct result of that assessment. "Rudds has provided advice as to the construction of an acoustic fence along the southern boundary of the site to shield the neighbouring properties from noise associated with these activities. The sound level of the container handler will also need to be reduced. After construction of the southern fence, and the noise mitigation to the container handler, it is possible that some exceedances of the night-time criteria may occur only between 6 am and 7 am due to heavy vehicle movements across the site." Appendix J p.24	No action required
10.10	No vibration assessment done	Vibration assessment not necessary. There will be no blasting at the site and truck vibration will be no greater than what currently exists from the road.	No action required
10.11	No use of spray on acoustic material in the shed	Mitigation using this sort of approach is possible if required – modelling already suggests it is not and the two measures indicated using an acoustic wall and sound attenuation on the forklifts is enough – periodic operational noise testing will be done to ensure continued compliance with criteria	No action required
10.12	Noise from trains (wheel squeal, flanging and idling)	Locomotive idling at the site was already considered in the Rudd's noise assessment p16. It must be remembered the rail system are existing approved tracks in an existing rail corridor and that the siding is straight – all curves and bend are existing no new branching being	See Appendix J

No.	Public Comment	Response	Action
		built only existing track refurbishment	
10.13	Noise report suggests one truck per 10 mins in the morning peak – (6 per hour would change the rest of the daily averages) (121)	This was a potential worst-case. Actual movements likely to be lower for most of the time. During the daytime, we have assumed up to 3 trucks every 10 minutes. If it was 1 truck every 10 minutes during morning peak and 3 trucks every 10 minutes the rest of the day, that equals 258 truck arrivals, which is 28 more than the AECOM traffic management plan shows, so we are over estimating, not under-estimating.	No action required
10.14	Noise monitor location wrong in report (384)	The objective of the noise monitor location mentioned was not to determine traffic noise from Canberra Avenue. Rather, it was used to assess traffic noise from the Southbound Monaro Highway on-ramp and is therefore in a suitable location because this is the closest location to the on-ramp.	No action required
11	Leachate Management		
11.1	There is a discrepancy between bund wall height (030,366)	Figure 12 of the Revised EIS shows nominally 2m high “push walls” where stockpiles are so that material can be picked up and stored efficiently and safely – these are separate to the perimeter bunding which has a minimum of 150mm roll over kerb at the doorway to allow vehicles to pass over and otherwise will function like a hob or curb on a gutter to not allow not allow stormwater in nor leachate out. – see EIS Section 6.3	Will be shown in DA stage
11.2	Floor design detail should show how the leachate is gathered in the shed	This level of detail will be submitted at the DA stage when the building design, which incorporates finals design levels, stormwater integration, site contamination measures, optimal leachate collection tank location. When these elements are combined the best internal drain locations for any leachate collected will be finalised. There will be leachate drain adjacent to the waste stockpiles and the containerisation area as a minimum.	DA stage
11.3	Leachate tank location needs explanation	This will be detailed in the design stage as it will depend on the best location taking into account the contaminated soils on the site and minimizing disturbance but also facilitating access, the leachate system is closed so that any surface liquids would gravity drain into the 20,000ltr tank. The leachate will then be either pumped into the shipping containers in small quantities as this would assist in decomposition at the landfill, It maybe be required to be pumped out to a tanker and taken for treatment or thirdly a trade waste connection is established for emergencies and this can be determined after the collected leachate is chemically tested after operation to determine its composition	DA stage
11.4	There should be wheel washes at the two container doors	The machinery at this end of the building is not traversing the tipping floor so is not prone to any inadvertent liquids or is driving through rubbish. The container handling forklifts will be operating outside and reach through the door to collect the container – not drive into the building.	No action required

No.	Public Comment	Response	Action
11.5	The 20,000ltr tank does not consider the wheel wash and storm watering entering the shed.	The building doorways are bunded and doors are closed to prevent stormwater entering. The wheel bath is not a wash and will have passive chlorinated water that will be topped up from time to time when evaporation takes place. If there was excess water or a requirement to clean the water will be recycled through the 20,000ltr tank as required	DA stage design detail
11.6	Should be an additional overflow tank for tank exceedances	CRS will put in a larger tank if the total requirement in the final design stage warrants this. Final determination on container injection, pump out and a trade waste agreement option will determine the final tank design and location. A volume will be included and will be signed off in the final approval and form part of the licence conditions	DA stage design and licencing stage
12	Contaminated site risk		
12.1	Not "fit for purpose" (121)	The assessment by WSP took the SAS July 2017 assessment that the site is suitable for the use/s based on the existing configuration of buildings and infrastructure onsite	No action required
12.2	Risk of disturbance during construction and use (119)	Should the final design risk disturbance to the identified areas on the site then the required remediation and validation would need to be carried out as per 6.1 of the WSP RAP. The CMP will incorporate the final RAP and final remediation plan to manage safely and correctly any excavations	See Section 7.2 of the EIS
12.3	No evidence of recent testing as per the audit requirements	WSP has included a monitored natural attenuation (MNA) program into the RAP document as part of the ongoing monitoring and management program for the site and made contingency management a post remediation management requirement to be implemented under the site EMP	Include in the EMP for Licence stage
12.4	Risk from PFAS firefighting foam	This was not included in the scope for WSP as there is no evidence of its use onsite. Should there be evidence then WSP have provided a separate process for assessment and management	DA Stage and EMP
12.5	Vapour barrier details are missing and performance over time assessment	WSP advises that HDPE barrier systems have been effectively applied in both Australia and Internationally for the protection of structures from vapours and bulk gasses. The technology itself has a proven track record. Like landfill the most significant risk of failure is in incorrect installation, poor sealing, incorrect identification of faults and damage during other construction. WSP can produce research that proves the chosen liner will resist BTEX vapours	DA Stage and EMP
12.6	Physical and mechanical properties of the liner must be provided in advance	The specifics of the proposed liner will be identified at the DA stage, along with the other design feature detail. The liner will meet the relevant standards and the proposal is not a unique design solution so the optimal outcome will be chosen in conjunction with the other design detail decisions	DA Stage
12.7	What contingency is there for the liner not working or over time	WSP consider the best way to minimise risk of vapour barrier failure is to install an additional level of contingency on construction phase. A passive ventilation system installed beneath the proposed vapour barrier would be the most effective. This may be in the form of a gravel and pipe gas blanket which leads to passive venting	DA Stage if required

No.	Public Comment	Response	Action
12.8	Independent site audit by GHD should have been included in the application as an appendix (121)	WSP references the 2017 SAR and SAS signed off by Andrew Kohlrusch (the appointed site auditor). The SAR reviewed by WSP was prepared by H Luo and signed off and approved by Andrew Kohlrusch (H Luo being the auditor representative for the project). This is standard procedure for site audits	No action required
12.9	Contamination surveys should be extended to Jerrabomberra Creek (032)	The intent of the MNA program presented in the WSP RAP was to assess potential risk to off-site receptors (including the creek and wetland) and outline contingency if it was found that the natural attenuation of the plume was not enough. The RAP can provide further detail on this, but it was considered that the monitoring program employed would be dependent on the findings and results of the remediation program and are better detailed at the EMP and design stage	DA Stage and EMP
13 Impact on Land Values			
13.1	Adverse impact on property values claimed	<p>While this is claimed by opponents it is not substantiated in any way. A 5-year growth look (2012-2017) presented on Realestate.com.au /investment analysis at a comparable (albeit much larger in volume, trucks, potential odour and noise) facility in Banksmeadow and the consequent impact on the nearest residential process is taken from Realestate.com.au website figures showing in August 2017. The five-year approach considers the public knowledge and planning phase of the Banksmeadow facility as well as the operations</p> <p>CRS Fyshwick Nearest residential areas</p> <p>Narrabundah House 6.0% annual growth Units 1.6% annual growth</p> <p>Kingston House No Data – mainly units Units 0.2% annual growth</p> <p>Griffith House 6.4% annual growth Units 0.4% annual growth</p> <p>Veolia Banksmeadow Nearest residential areas</p> <p>Hillsdale House No Data – mainly units Units 8.5% annual growth</p>	No action required

No.	Public Comment	Response	Action
		<p>Matrville House 13% annual growth</p> <p>Units 8.8% annual growth</p> <p>Botany House 12.3% annual growth</p> <p>Units 6.2% annual growth</p>	
13.2	Fyshwick properties recovering from low rent period	Noted – the rental process is determined by demand and the recent release of new industrial sites (Hume, Beard etc.) has drawn business away. The central location of Fyshwick will always ensure occupancy	No action required
14 ACT No Waste Feasibility Study (WFS) Variances			
14.1	ACT No Waste	<p>“ACT NoWaste's role is to implement the ACT Government's No Waste Strategy through effective programs that engage the community and encourage sustainable waste minimisation and management practices. ACT NoWaste facilitates and encourages the resource recovery industry to maximise the recovery and recycling of wastes in the ACT and surrounding region. Other responsibilities include provision of domestic garbage and recyclables collection services, sorting and reprocessing of recyclable materials, and management of waste acceptance and disposal facilities”</p> <p>CRS has been able to read, discuss and participate in ACT waste management strategies over the years and has formed the view that the system of waste management comes from a base of quasi monopolistic government run perspective. In other words, the Government is going to solve the problem in its own time. Around the world the solution is often delivered through a range of public and private sector solutions that produce the result.</p> <p>It is CRS's view that the Draft Waste Feasibility Strategy is a methodical document that seeks to tackle aspects of the ACT waste management in a sequence that aligns with budget expectations. This prescribed rollout will again take significant time– No significant recycling solution is being proposed for the Commercial waste stream and this is the biggest proportion going to Mugga Lane landfill.</p> <p>There is no reason that the solutions cannot be delivered in parallel and therefore the prospect of achieving the targets set by Government may be achieved faster and cheaper to the taxpayer. ACT has had relatively flat line recycling in the last 10 years – confirmed by the Minister in the Waste Feasibility Study:</p> <p>“the Territory's resource recovery rate has plateaued at around 70 per cent for the last</p>	See Appendix R and Section 1.3 in the Revised EIS

No.	Public Comment	Response	Action
		<p>decade, and the waste sector is unlikely to be carbon neutral by 2020 under current management practices.” (p5) Mugga Lane was almost full in 2014 and the strategy of “No Waste by 2010” has been and gone. There is currently overlapping ACT Waste Management Strategy 2011-2025, upon which CRS has considered, as the “the key strategy for managing waste in the Territory” (quote from ACT NoWaste section 3 of this submission) and now the Waste Feasibility Study recommendations May 2018 (discussion paper).</p> <p>In the ACT Waste Management Strategy 2011-2025 you can see in their Figure 5 (below) that the identified facility, proposed by CRS, is part of that active strategy and clearly indicates that a red bin waste material recovery facility, Commercial material recovery facility, PEF facility and energy were all potential solutions. CRS is proposing to get on with tackling a number of those, already identified facilities.</p>	

No.	Public Comment	Response	Action
		<p style="text-align: center;">FIGURE 5: THE ACT'S WASTE MANAGEMENT SYSTEM WITH POTENTIAL OPTIONS FOR GREATER RESOURCE RECOVERY</p> <p style="text-align: center;">TOWARDS A SUSTAINABLE CANBERRA 13</p>	
		<p>CRS has made the following submissions to the Territory since February 2017:</p>	

No.	Public Comment	Response	Action
		<p>Market Sounding response (Feb 2017) Scoping for MRF and WtE (May 2017) Scoping for MRF (Nov 2017) EIS for MRF (Feb 2018)</p> <p>In all the submissions above, ACT NoWaste has not offered any commentary or questioned the CRS proposals until the proposal was on exhibition. Despite being formally involved in the consultation process and being asked by EPSDD for input into two scoping documents and they ran a Market Sounding process in 2017.</p> <p>CRS is now being required to assess its proposal against the ACT NoWaste “Roadmap” discussion paper which appeared in May 2018. This discussion paper appeared after CRS had prepared its EIS and submitted it for exhibition. It is derived from the Market Sounding Process to which CRS contributed. to but received no feedback. The Market Sounding tender process was to deliver feedback to industry by September 2017. This would have assisted in shaping the EIS commentary and detail. A letter was received in September 2017 advising that a report would be presented to Government by the end of 2017. No further information was supplied to respondents or any feedback received while the report was being constructed and approved. ACT NoWaste have only made themselves available for a formal meeting since the release of their Roadmap discussion document which was in early June 2018 but after the CRS EIS was on exhibition.</p> <p>As the exhibition periods have overlapped the ACT public have compared the two documents and pointed out differences between the two when there was no opportunity to align them. CRS has addressed the Waste Feasibility Study in the revised EIS (see Section 1.3.4). CRS commenced its proposal back in 2015 and has chosen to continue its applications for its waste proposals and has only targeted the processing of two specific waste streams that currently go directly into landfill. CRS has made it clear that it only seeks to target the processing of this and has made it clear in its various documentation that it does not seek to stop or inhibit ACT recycling initiatives that would arise along the way and is more than willing to work within the system, whatever that develops into.</p> <p>Please see Appendix R for specific other questions raised by ACT NoWaste and the CRS responses</p>	
14.2	Should be in Hume - recommendation in market sounding	CRS has prioritised a working railway in its sites selection. Discussions with TfNSW have indicated that the old Cooma rail line will not be resuscitated adjacent to Hume.	No action required

No.	Public Comment	Response	Action
14.3	Conflicts with Waste Strategy (recommendation 2 & 3)	<p>The waste management system is ever changing and since the Waste Feasibility Study was released, China has increased its quality requirement for recyclables and the EPA has stopped food waste derived compost from being used in agriculture, mining and forestry. The industry is used to adaption and the design of the CRS proposal has this in mind. Section 2 of the WFS indicates that there is more opportunity for recycling and recovery and as far as CRS is concerned the Commercial and Industrial waste streams are an opportunity and the WFS conforms this. The easiest part of recycling is the first part. The later mixed fraction is the hardest and need special attention and facilities. In Section 3, CRS has been involved in the consultation stages and been par to the Key Influencer group. CRS also made a submission to the Market sounding process in 2017.</p> <p>None of the recommendations affect CRS other than available tonnage. CRS is offering to assist in the separation of non-source separated food waste and organics and can also modify its processing to produce PEF as mooted. Waste to Energy has been shelved by CRS but the sorting of Commercial and Industrial waste is not incongruent with the objective of the WFS</p>	See Appendix R and Section 1.3 in the EIS
14.4	Does not divert organics from landfill (124)	<p>This is incorrect as the prospect of separating both wood and greenwaste is discussed in the EIS. Organics such as food waste wont initially be diverted by CRS as there is no processing facility at this time nor a timetable to have one established. Greenwaste and wood waste can be separated and diverted, and this was proposed in the EIS in Table 3 and Figures 11 & 12. In time, the FOGO scheme will potentially establish one such facility and the diversion of food wastes by CRS can then occur. It should be noted that the “cost of processing FOGO material to produce compost that meets the EPA standards and market acceptance may be significant” p22 (WFS). For this reason, there will should be a dedicated facility and collection service that will naturally require more truck services to the household to bring Fogo to a reality.</p>	See Section 2.4 in the EIS
14.5	Application proceeding before the Waste Feasibility Study is finalised (127)	<p>There have been several waste strategies that have not achieved their goals. There have been several calls to industry for ideas. CRS has been proactive in offering a solution that is entirely flexible to merge with the strategies of the Government of the day.</p>	No action required


14.6	CRS would recycle only about 20% and the organic fraction would end up in landfill (371)	<p>Currently this is what is proposed and was written in the absence of any government direction. The Waste Feasibility Study outlines a possible FOGO scheme in the future that will require a new collection scheme, additional collection services in every street and a processing and a significant storage facility for the 3-4-month conversion- to- compost process. This is yet undefined and is some “five years” away. Now that the scheme has been proposed by ACT NoWaste, CRS, who was already going to remove greenwaste (currently 13% of red lid bin waste), will be modifying its MSW processing line to be able to separate food waste material that is not captured by the source separation and divert it to the ACT Governments FOGO facility, once built, and therefore divert it from landfill. This will include commercial food waste and inevitable mixed waste material from the Multi- unit developments where adding extra bins and source separating is known to be problematic. There are no details of the ACT’s FOGO program, or facility location at this stage. In the interim the only alternative is to put the food organics into landfill (but at least getting a 20% diversion not currently being achieved across both waste streams) CRS is more than willing to modify its separation processing to merge into the WFS at the appropriate time. where possible. To date the WFS is heavily focused on the Municipal waste stream, which is smaller (30-35%) than the C&I waste stream – CRS can address the recycling of this waste stream in the meantime and is also willing to develop its processing ability, at the appropriate time, to the production of Process Engineered Fuel (PEF). This has been made clear as a possibility under recommendation 1.11 of the Roadmap and whilst it is quite clear that the objective would be for “export to interstate or international cement kilns or power stations”. CRS interprets this as the production and export of PEF is ok in the ACT but not largescale energy recovery. CRS believes that it could develop this PEF production recommendation from the roadmap quite simply and at no cost to the ACT. This could be done in parallel with the FOGO rollout. In fact, the separation of organics would be part of the PEF manufacturing process.</p> <p>It is incorrect to assume that a modern dedicated MRF cannot adapt over time to the needs of the waste strategy of the day. The changes are merely to the sorting equipment in the building and the separation processes. The volume of waste going in is the same and the number of reusable fractions leaving will vary based on the recycling markets and what post separation processes are available. FOGO is a post separation process that does not exist in the ACT now and there is no source separation, so CRS is offering the best alternatives in the short term, given that the implementation of the new ACT Waste Feasibility Study is still in draft form and has not fully begun</p>	See Sections 1.3 and 2.4 in the Revised EIS
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No.	Public Comment	Response	Action
14.7	It's just a Transfer station (Poor recycling % - not justified).	CRS finds it curious that it is claimed by some objectors that 5% truck traffic increase is "statistically significant" yet a conservative contribution to the recycling effort of some 20% reduction to landfill from two specific waste streams is dismissed as "not significant" nor worthwhile. Not one submission has acknowledged that the recycling efforts currently occurring under the current regime is the easiest fraction to recycle as it is already source separated. The estimated recovery rate for plastics in the ACT (8%) is below the national average suggesting a lack of recovery infrastructure for plastics and/or a lack of end markets for the lower grade plastics (Australian National Waste Report 2016, Rendell Environmental Consulting) so the difference between what is being recycled now and the government's target of 90% diversion is a significantly harder fraction to achieve and there needs some sort of processing to achieve it. CRS has always proposed a maximum volume/worst case environmental impact scenario in its consultant's assessments therefore the impact of any real change to the waste management system by the Government will not impact the proposal because the viability of the project is not based on 300,000tpa. This is the number merely used to establish the worst-case environmental scenario. CRS operates in the real commercial world and expects competition – The Government has had many strategies over the last 10 years to achieve "zero waste". CRS believes it has a sound business and technical basis, does not rely on public monies and is committed to this project.	See Sections 1.3 and 2.4 in the EIS
14.8	What happens to the contaminated waste (121, 366) – specific handling required	The detailed operating procedures are not unique to this facility and the exact operational detail will form part of the OEMP which will be submitted with the development application and will need to form part of the facility licence. It should be noted that currently all the "hazardous" waste is currently not separated and going into landfill. Any efforts at separation will be greater than currently occurs and the safety of the staff will be the number one priority in separation procedures	No action
14.9	Won't achieve 20% with red lid bin waste (126)	Currently greenwaste makes up some 13% of the MSW waste stream. This combined with other material will see up to 20% from this stream. The C&I waste stream which makes up some 70% of the total, will offer higher than 20% recovery opportunities. There will always be commercial food waste to be separated and the waste material collection from the multi-unit developments will contain significant contamination and will need processing before FOGO treatment	See Section 2.4 in the EIS
14.10	Can achieve better recycling through education (302)	The Government has already admitted that its recycling efforts have plateaued in the last decade. Education will always be required, and the contamination of greenwaste and FOGO are future challenges. CRS will support any Government waste education initiatives and will be conducting school and group tours of our facility	No action required

No.	Public Comment	Response	Action
14.11	Leeds MRF in UK targeted 10% and only got 2.5% and now 4.5% (461)	The removal of greenwaste and the proposed FOGO program will decontaminate the red lid bin waste stream making it easier to sort. Direct comparisons are not always possible as the criteria for recovery is different as the Leeds plant is feeding waste to energy plants. The Leeds plant has only been recently commissioned and still expects to achieve its targets.	No action required
15 Greenhouse Benefit			
15.1	Not diverting organics	<p>This is not correct – currently there has only been a greenwaste bin trial and now an opt in service with the greenwaste collection as a separate service in some suburbs. Separation of the greenwaste was also proposed in the CRS facility and even if a dedicated service was put in place by the Government, recyclable greenwaste that arrives in the CRS facility would still be diverted from landfill to the appropriate site for greenwaste reprocessing as part of the total ACT recovery effort. This would still form part of the landfill diversion that the government seeks.</p> <p>The Waste Feasibility Strategy has also earmarked a FOGO collection scheme. This would also reduce the volume of MSW food waste to CRS in some 5 years’ time when the scheme and processing facility has been through the planning and community consultation process and is built. Again, should this proportion of the MSW waste stream be diverted then it will reduce the odorous component of the waste stream and will therefore make the environmental concerns of the community simpler to appease.</p> <p>If there were a reduction of some 50% of the MSW waste stream through the government collecting FOGO waste and taking it elsewhere then there could be conceivably be some 50,000 tonnes less waste available to CRS. Importantly it is the odorous component which would then be dealt with at a different facility or location. Any reduction in the food waste or greenwaste volume (by dedicated collection services) at CRS means that the potential for odour reduces as does the volume of trucks etc. The wet waste removed will also remove the production of leachate. These community concerns will obviously be transferred to the Government’s future food / greenwaste facility/site. It is unclear if these are open air or enclosed such as CRS is proposing.</p>	See Sections 1.3, 2.4, 2.6 and 4.3 in the Revised EIS
15.3	Increased emissions from trucks in area	<p>An assessment of the impact from truck emissions is included in Todoroski Air Sciences report</p> <p>“Truck air quality impacts are considered as part of the Todoroski Air Sciences assessment. For the vehicles travelling on-site, the proposed measures to minimise dust emissions from this activity include having all trafficked areas hardstand to reduce wheel generated dust emissions and regular cleaning of trafficked areas. Exhaust emissions can be minimised</p>	See Section 6.8 in the Revised EIS and Appendix Q

No.	Public Comment	Response	Action
		<p>through ensuring all vehicles are maintained regularly and engines are switched off when not in use for extended periods.</p> <p>The Project site will have significant on-site queuing space and dual weighbridges to limit any on-street queuing risk. The types of trucks delivering waste to the site are sealed however there could be some residual odour from some vehicles. This odour source would be transient in nature and would not be expected to remain in one place for any extended period.</p> <p>We note that the Project would see a redistribution of air emissions associated with trucks along the roadways as they travel towards the Project site instead of a licensed landfill, as would occur without the Project. “</p>	
15.4	Climate change been “brushed over” (451)	<p>CRS has addressed the role waste management plays in the ACT Climate change strategy. There are various Strategies that discuss Climate Change, and these are the ACT Climate Change Strategy AP2 2012 and it is also addressed in the ACT Waste Management Strategy 2011-2025. The clear focus from these Strategies is to address the production of methane gases by removing organic wastes from landfill and:</p> <ol style="list-style-type: none"> 1. avoid products becoming waste (reduce and reuse) 2. find an alternative use for waste (recycle and recover), and 3. ensure safe and appropriate disposal as a last resort. <p>CRS understands the waste hierarchy and its proposal is not designed to interfere with any program designed to avoid the production or recycling of waste. Minimising of the waste to landfill, in both short and long-term strategies achieve the same outcome. Removing the inevitable methane leakage and finding alternative uses for materials can occur for an additional 20% of the material currently going to landfill. Removal of short-term greenwaste and potentially long term, food waste will have a significant impact on the production of landfill methane but will also inhibit the production of electricity currently sourced from this methane.</p>	See Sections 4.3, 6.8, 7.1 and 7.2 in the EIS

No.	Public Comment	Response	Action																																				
		<p data-bbox="688 235 1482 261">TABLE 1 GREENHOUSE GAS AND WATER SAVINGS FROM RECYCLING</p> <table border="1" data-bbox="688 297 1579 667"> <thead> <tr> <th>Type of material</th> <th>Tonnes recycled 09–10 A</th> <th>water saving per tonne (KL)</th> <th>Water savings (kL) B</th> <th>GHG saving per tonne</th> <th>GHG emissions savings (tCO₂-e)</th> </tr> </thead> <tbody> <tr> <td>Paper</td> <td>51224</td> <td>15.58</td> <td>798,000</td> <td>1.54</td> <td>79,000</td> </tr> <tr> <td>Timber</td> <td>47543</td> <td>0.07</td> <td>3,000</td> <td>0.15</td> <td>7,000</td> </tr> <tr> <td>Glass</td> <td>16783</td> <td>2</td> <td>34,000</td> <td>0.33</td> <td>6,000</td> </tr> <tr> <td>Aluminium</td> <td>2319</td> <td>233.2</td> <td>541,000</td> <td>15.80</td> <td>37,000</td> </tr> <tr> <td>Steel cans</td> <td>1026</td> <td>1.1</td> <td>1,000</td> <td>0.81</td> <td>1,000</td> </tr> </tbody> </table> <p data-bbox="688 695 1415 717"><i>A – Figures provided by Territory and Municipal Services Directorate, ACT Government.</i></p> <p data-bbox="688 737 1549 813"><i>B – Figures from GHD (2009) 'Waste Technology and Innovation Study' for the Department of the Environment, Water, Heritage and the Arts (DEWHA) at http://www.environment.gov.au/settlements/waste/publications/waste-technology.html.</i></p> <p data-bbox="678 850 1675 1073">It should be noted from the extracts above and the table above that the removal of paper, timber, glass, aluminum and steel cans are all positive in terms of greenhouse gas and water savings. All of these materials (and others including green waste) are proposed to be recycled by CRS as indicated in Table 1 of the EIS. Of course, CRS is proposing to recycle other materials such as concrete and inerts, plaster board and other metals where there is production saving in the cost to the environment of mining raw materials to replace those that can be reused</p>	Type of material	Tonnes recycled 09–10 A	water saving per tonne (KL)	Water savings (kL) B	GHG saving per tonne	GHG emissions savings (tCO ₂ -e)	Paper	51224	15.58	798,000	1.54	79,000	Timber	47543	0.07	3,000	0.15	7,000	Glass	16783	2	34,000	0.33	6,000	Aluminium	2319	233.2	541,000	15.80	37,000	Steel cans	1026	1.1	1,000	0.81	1,000	
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15.5	Does not demonstrate how it will move to net zero GHG by 2045 (451,464)	<p data-bbox="678 1081 1675 1268">On 18 September 2018 when the Legislative Assembly passed the Climate Change and Greenhouse Gas Reduction (Principal Target) Amendment Bill 2018 to amend the zero net emissions target in the Climate Change and Greenhouse Gas Reduction Act 2010 (ACT). The bill proposed to reduce the principal target of zero net emissions from 2050 to 2045. (this was after the EIS was prepared and on exhibition). The EIS has now been updated to include the latest GHG targets and the implications of Government Strategy.</p> <p data-bbox="678 1305 1675 1396">The ACT Climate Change Strategy “To a Net Zero Emissions Territory” Discussion Paper released to promote this amended target was introduced in December 2017 and discusses the following in relation to waste management:</p>	See Sections 4.3,6.8, 7.1 and 7.2 in the EIS																																				

No.	Public Comment	Response	Action						
		<p data-bbox="680 228 758 253">Source</p> <p data-bbox="716 289 1285 423">Figure 3: ACT emissions in the 2015–16 Greenhouse Gas Inventory, showing electricity and transport as the major contributors to our emissions</p>  <table border="1" data-bbox="726 1110 1314 1360"> <tr> <td>55% ELECTRICITY</td> <td>3% WASTE</td> </tr> <tr> <td>27% TRANSPORT</td> <td>5% INDUSTRY</td> </tr> <tr> <td>9% GAS</td> <td>1% OTHER (FUEL OIL, WOOD FUEL, AND NATURAL GAS LEAKAGE)</td> </tr> </table>	55% ELECTRICITY	3% WASTE	27% TRANSPORT	5% INDUSTRY	9% GAS	1% OTHER (FUEL OIL, WOOD FUEL, AND NATURAL GAS LEAKAGE)	
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No.	Public Comment	Response	Action
		<p>Source: "To a Net Zero Emissions Territory" p.12</p> <p>The Waste industry contributes some 3% of the total emissions and this has largely been identified as the breaking down of organic waste at landfill.</p> <p>Key targets are remove emissions from solid waste (divert organics, achieve higher recovery rates for MSW, C&I and C& D wastes), best available land fill capture technology</p> <p>CRS is proposing to contribute directly in all these strategies and any residues going to Woodlawn are going to an excellent and purpose designed landfill that has been an engineered landfill with capture technology since day 1 of operation.</p> <p>The latest ACT Climate Change Strategy to replace the 2014 Strategy has not yet been released at the time of writing.</p> <p>A comparison between Train and Truck transport is contained in Section 6.8 of the EIS and in Appendix R.</p>	
15.6	Does not move it more and faster than current waste strategies	If 20% more is recycled or diverted, then that is an improvement on the current situation in terms of recycling and recovery. The Government has been proactively seeking answers and targeting less landfill, more recovery and less GHG. Any future proposals will need a site, funding have EIS or DA applications for scrutiny – More processing means more time therefore doing more of the same will get the same outcome and the Government does not want that	No action required
16	Location		
16.1	Community was not involved in site selection	This is not a government project. It is a privately funded venture and is seeking to commercially compete in the market place	No action required
16.2	Too near Residential (Wiluna St 100/50m? 700m) (156)	This was raised in two submissions without supplying any detail of the residence location. It is stated that there is a lease purpose clause for a residence. CRS has searched for property records and the ACT land and development lease and developments conditions register search for Wiluna Street blocks and has found a strata submission dividing the block at 8 Wiluna Street into two units. The lease purpose mentions that Unit one may be used for residential. CRS is not aware if the residential is being used as such or whether the residents made complaint directly. It should be noted that this site is some 110m boundary to boundary (large buildings in-between and is on the southern side of Wiluna Street) and some 140m from the MRF building and 250m from the rail track. CRS, whilst located its proposal in an industrial setting, is designing this development to focus on managing any	The EIS has been amended to include this anomaly

No.	Public Comment	Response	Action
		<p>potential impacts to within the boundaries of the industrial site. In this context the presence of one residential unit does not change the level of impact as this has been either contained to the site or mitigated in Wiluna Street by modifying the traffic access from Ipswich Street to minimize vehicles in Wiluna Street. The Territory in granting the “caretaker residence” did this at the same time as confirming the industry or industries lease purpose for the same site. It is arguable that the residence is not a sensitive receptor as it is co-located on an industrial zoned site in any event.</p> <p>To use Units 1 & 2 for the purpose of an industry or industries (other than a noxious trade) and for any purpose subsidiary to such industry or industries AND FURTHERMORE unit 1 may also be used for the purpose of a residence;</p>	
16.3	Too near Businesses	<p>It is an industrial commercial suburb and zoning – The proposed use is specifically permissible in the zoning. The precinct of Fyshwick was set up for industry and the diagram below clearly demonstrates that Fyshwick had a strong fuels and concrete focus utilising the rail. While some of this has changed the precinct where the MRF is proposed still has two concrete batching plants and two recycling facilities virtually adjacent. Shell was the last to move out of the fuel facilities and this was in 2010 when the train connection was still in use. The diagram clearly shows the extent of industry. This has been and continues to be an ideal location for industry</p>	No action required

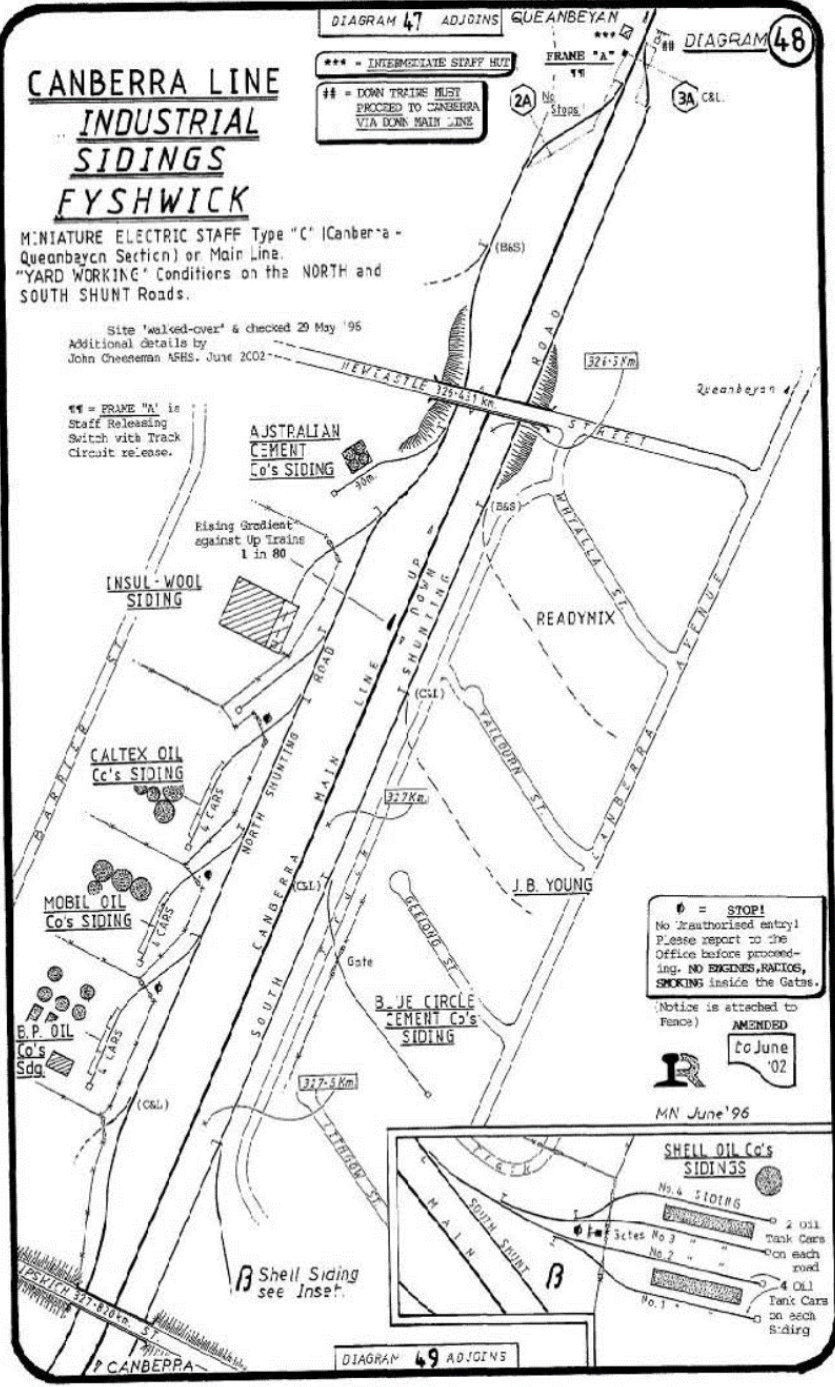
CANBERRA LINE INDUSTRIAL SIDINGS FYSHWICK

MINIATURE ELECTRIC STAFF Type "C" (Canberra - Queanbeyan Section) or Main Line.
"YARD WORKING" Conditions on the NORTH and SOUTH SHUNT Roads.

Site 'walked-over' & checked 20 May '96
Additional details by
John Greenman ARBS, June 2002

☐ = FRAME "A" is Staff Releasing Switch with Track Circuit release.

DIAGRAM 47 ADJOINS QUEANBEYAN
*** = INTERMEDIATE STAFF HUT
= DOWN TRAINS MUST PROCEED TO CANBERRA VIA DOWN MAIN LINE
DIAGRAM 48



⊘ = STOP!
No Unauthorised entry!
Please report to the Office before proceeding. NO ENGINES, RACIOS, SMOKING inside the Gates.
(Notice is attached to Fence)

AMENDED
to June '02
MN June '96

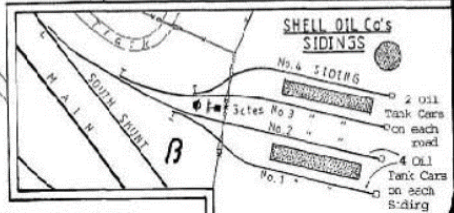


DIAGRAM 49 ADJOINS

No.	Public Comment	Response	Action
16.4	Near airport	The Capital Airport Group did not object to the proposal, acknowledged the design elements incorporated, and has supplied a submission advising of this (Submission 336)	See Appendix U.
16.5	Too close to parliamentary triangle	See response from National Capital Authority – No issues or DCP requirement by the Authority is required. The Authority has deemed that that development does not have frontage to the Monaro Highway therefore a DCP is not necessary.	See Appendix V
16.6	Inconsistent with changing Fyshwick culture, Govt has driven the change in culture – this will destroy “evolving culture”	This is not reflected in the land use zonings or objectives. Analysis of the proposal against the zone objectives is contained in Sections 3.3 and 4.2 of the EIS documents and can be found in the “Zoning” section of this document below.	See Sections 3.3 and 4.2 in the EIS
16.7	No room for expansion of activities	The proposed building enjoys about 25% site coverage – there is plenty of room to expand and in no way is this an overdevelopment compared with other adjacent structures.	No action required
16.8	Many environmental Impacts	Concerns relating to environmental risks have been mitigated extensively. For example, key concerns such as noise and odour have been substantially mitigated with building design and onsite measures. Hazardous risks such as vermin, fire	See Sections 6.1 – 6.11 and summary of mitigation measures and monitoring in Sections 7.1 and 7.2 in the EIS
16.9	There are better locations elsewhere (Hume, Mugga, Mitchell, Molonglo, Harmon, between Canberra and NSW)	This is claimed yet they lacked the key site characteristics that were determined by CRS to be important at the time that were available in the Fyshwick site: Rail access, Appropriately zoned, Available. The site has since 1958 been rail supplied industrial area and given this was deemed a critical long-term feature this was why other locations were not deemed to be better. It should be noted that CRS was looking at site availability in 2014/15 and other land may have been released since that time but not adjacent to the rail which has been supported by rail entities throughout	No action required
16.10	Rail siding is not enough justification to cause impacts – not planned well	The site previously had direct rail access. The environmental risks have been quantified and mitigated if necessary, so it is an appropriate location and the Territory Plan permits the activities proposed. With population of Canberra expected to double in the next 40 years the only option is to use more trucks to service the city. As there is a perfectly good, albeit underutilized, rail network in existence the increased use of this would seem to be sensible initiative, especially at this stage of the city’s growth.	No action required
16.11	Too close too East lake and Dairy Flats (Molonglo) – separation guidelines	See specific responses to both land release development strategies (below)	See below and in Section 6.1 of the Revised EIS

No.	Public Comment	Response	Action
16.12	“principal concern is that it could constrain property owners to realise the full legitimately available to them under the terms of their crown lease” (463)	The proponents also have the right to use their land for full and permissible uses – it works both ways. The use of land in Fyshwick for waste management purposes is available to many sites and is indeed conducted already on other and adjacent sites to the proponent. It should be noted that this type of facility is not unique in an urban environment and they co-exist in many cities through-out the world.	No action required
17	Alternate Sites Not Considered		
17.1	Undermines Mugga lane recycling park	CRS has based its solution on the long-term benefits of rail, which is not limited to Woodlawn and Port Botany in the future. Access to a functioning rail line was a key factor and while Hume was considered, the defunct rail situation ruled it out.	See section 2.6 In the Revised EIS
17.2	Beard and Hume are in the rail freight strategy (030)	Acknowledge that Beard and Hume are noted as being places with future land supply for freight transport industry. However, no appropriate sites were identified in these locations and had the requisite rail access.	See Section 2.6 in the Revised EIS
17.3	Did not consider Block 3 Sections 45/47 Fyshwick (463)	Not appropriate. This site is too big and is located within the river corridor and is a special purpose reserve.	No action.
17.4	Should be in the Hume resource recovery estate (463)	This has been modified and discussed in Sections 2.4 and 2.6 of the EIS	See Sections 2.4 and 2.6 in the Revised EIS
18	Zoning		
18.1	Contravenes IZ2 zone objectives	<p>It is called IZ2 – Industrial Mixed Use – and the proposal is consistent with many of the zone Objectives:</p> <p>IZ2 Industrial Mixed-Use Zone Objectives</p> <p>a) Support the diversification and expansion of the ACT’s industrial base and employment growth;</p> <p>The MRF will employ some 48-fulltime staff and 10 additional part-time staff. There will also be many flow-on jobs created through the revival of freight rail in the ACT as part of the RFT operation. Noting that such a facility does not currently exist in the ACT, the proposed use also contributes towards a diverse economic base.</p> <p>b) Facilitate investment in a wide range of industrial and related activities, with efficient land utilisation and provision of infrastructure;</p> <p>The proposed use contributes towards a broader range of industrial uses. The use does not exist within the ACT at present. The site has direct access to the south shunt and as such, utilising this site for freight exports ensures optimal use of the rail shunt and is also an opportunity to integrate with existing underutilised rail infrastructure.</p> <p>c) Provide convenient access for ACT and regional residents to industrial goods,</p>	See Section 3.3 in the Revised EIS

No.	Public Comment	Response	Action
		<p>services and employment opportunities; Given the site’s central locality in the suburb of Fyshwick, the proposed use provides convenient access to employment opportunities</p> <p>d) Ensure that industrial development achieves high environmental standards of cleaner production, waste disposal, noise and air quality; The adoption of innovative technology and design practices ensures the proposed MRF does not detract from air quality or noise. The proposal achieves high environmental standards through the reduction of greenhouse gas emissions and diversion of landfill from the Mugga Lane Landfill.</p> <p>e) Encourage the design and construction of industrial and commercial buildings that are energy efficient, functional and flexible; The proposed MRF will be purpose built and include innovative designs. This will ensure construction and operations are as energy efficient as possible and do not significantly impact the local area.</p> <p>f) Ensure that development along major approach routes and major roads meets appropriate standards of urban design; The proposed development is located on Ipswich Street, approximately 100-350m from two major approach routes in Canberra Avenue and Monaro Highway. The development is to adopt modern design principles and will reflect the industrial character of the area.</p> <p>g) Accommodate industry-associated retailing, services and other commercial uses without jeopardising an adequate supply of industrial land; The proposed use is predominantly an industrial use. It is considered that it will not jeopardise or interrupt the supply of industrial land in Fyshwick.</p> <p>h) Provide for a range of commercial and service activities at a scale that will protect the planned hierarchy of commercial centres and the Territory’s preferred locations for office development; The proposed use is an industrial use precinct. It is considered that the use is correctly located in an industrial estate and complies with the hierarchy of commercial centres.</p> <p>i) Meet the need for a mix of lower rent bulky goods retailing, specialised industrial, commercial and service activities alongside general industry; The proposed development will be purpose built and is a specialised industrial use. It will appear to be like an IKEA or Bunnings store from the outside. The site is co-located alongside other industrial and recycling facilities to ensure a mix of activities in Fyshwick.</p> <p>j) Preserve and promote viable industries that can coexist with more commercially oriented uses; The proposed use is an industrial use. The use can coexist with more commercially oriented uses and will not negatively impact on any of these adjacent land uses.</p>	

No.	Public Comment	Response	Action
		<p>k) Make provision for small-scale services that support surrounding industrial activities, or which meet the needs of the local work force; Not applicable.</p> <p>l) The following Zone Objectives apply specifically to West Fyshwick:</p> <p>i. Encourage Canberra’s regional role for food processing, wholesaling, distribution and marketing</p> <p>ii. Cluster uses which are compatible with and complementary to existing facilities, particularly with regard to food processing and warehousing and the markets, including some small-scale food retailing</p> <p>iii. Protect the safety and amenity of food related enterprises</p> <p>iv. Promote buildings along Canberra Avenue that maintain and enhance a character appropriate for a major approach road to the Central National Area</p> <p>The subject site is not in West Fyshwick.</p>	
18.2	Light industrial character in Fyshwick – not heavy industry	There are no references to “Light” industry in the zoning (see above)	No action required
18.3	It is “illegal” to build a large rail terminal in Fyshwick (115), IZ2 prevents railway use	The RFT is on land zoned TSZ2 which the use is permitted. The MRF is located on land zone IZ2 which the use is permitted	No action required
18.4	“noxious trade” under lease purpose clause	It is not a “noxious trade” and is permissible as an “industry”	See Section 3.3 in the Revised EIS
18.5	Contravenes “special zoning” objectives for the Fyshwick food market	The “special zoning” objectives relate to West Fyshwick which is the other side of the Monaro Highway near Kingston (see above)	No action required
18.6	Does not meet ACT Planning separation guidelines	See comments in Section 6.8 and response to “Odour” above	See above and Section 6.8 in the Revised EIS
18.7	Inconsistencies between the direct sale and applications (127)	Applications vary over time – the original direct sale process began back in 2015	No action required
19 Impact on Existing Businesses			
19.1	Cause to lose business, staff or shut down	No evidence of this in other situations. Fyshwick is coming out of a low period of rent and vacancies which was not a result of this proposal	No action required

No.	Public Comment	Response	Action
20	Building Scale		
20.1	Too big (032), too small (366) – Scale not suitable, no expansion, biggest in Australia (127)	<p>The building is designed to function with all the waste unloading, loading, processing and storage to take place INSIDE. This allows specifically for the management of odour, noise, fire, vermin, impacts from weather, control of leachate etc. Clyde and Banksmeadow putrescible transfer stations do not have in-situ processing equipment other than compactors</p> <p>Adjacent buildings are all similar in height.</p> <p>Adjacent buildings such as Harvey Norman have a much larger building foot print – some 11,000m2 on a block of some 18000m2, which is some 61% coverage. Adjacent building at 23 Barrier St has a site area of 9600m2 with a building area of 5700m2 which has some 60% site coverage.</p> <p>Adjacent building at 19 Barrier St has a site area of some 11,100m2 and a building of 8000m2 which is a site coverage of 72% CRS is proposing a building of 7250m2 on a site of some 32,600m2 so the site coverage is some 22% which is exceptionally low in the context of Fyshwick and certainly allows room for expansion if required.</p>	No action required
21	Lack of Business Case		
21.1	No evidence that ACT or NSW Govt will support proposal, or it is economic	CRS has invested millions of dollars on this proposal. Government support has been indicated along the way in different forms. Sale of land application consent, signatory to scoping and development applications, NSW Government grant for railway repairs, Long term lease for rail freight terminal. Landfill and rail access to Woodlawn facility etc. This is a private venture and there the economic risk is with the proponent and not the Government or ratepayer	No action required
21.2	No evidence that this proposal is necessary	The Government has had a flat line response to recycling rates in the last ten years and has set itself some landfill diversion and greenhouse gas goals. The Government has publicly sought solutions from industry on several occasions	No action required
22	Mugga Lane		
22.1	No need to move, plenty of space and life	Noted – this has been the subject of conflicting messaging. CRS is focused on recycling and on other processing that will preserve landfill space	No action required
22.2	Woodlawn not “superior”	Noted – this is not a simple comparison so references comparing have been removed	Changed references in Exec summary, and Sections 2.4 and 2.6 of the Revised EIS

No.	Public Comment	Response	Action
22.3	“No issue of poor management” at Mugga Lane (124)	Environmental performance is measured through compliance and performance	No action required
22.4	ACT Legislation supports operation of Mugga for another 30 years from 2015 (124)	There is an EIS approval and a development application requirement for staged release of new landfill cells. The time frame seems to vary from document to document. CRS is proposing a recycling facility in any event and is open-minded about working with the ACT Government to achieve its goals	No action required
22.5	Mugga is more efficient than Woodlawn at collecting methane (124)	The two cannot be easily compared, so best left out	Reference to this has been removed from the EIS
22.6	The most advanced glass recycling is already at Hume	Any glass waste sorted by CRS will be sent there if commercially viable	No action required
22.7	The proposed Fogo scheme will remove 37% of the MSW waste stream (461) – CRS not needed (294) – more than 20 councils using FOGO in NSW	This is proposed in an ACT NoWaste Discussion document. There is no evidence that that % claimed will be realised as contamination in urban FOGO schemes have experienced high contamination levels. The use of the increased volumes of compost has not been proven in the ACT situation other than compelling Government to do so which can happen in a monopoly situation. Site location, traffic and odour cannot be addressed until a site and proposal has been established.	See Section 1.3 in the Revised EIS
22.8	If FOGO trial successful, then facility justification is questionable – simpler to get Canberrans to use green waste and FOGO	There is some time before the facility and collection scheme exists or can be tested for quality. It has already been said to be costly in the discussion paper and the environment impacts have not been assessed. It will address 40-50,000 Tpa of the ACT waste stream and there is plenty of waste to recycle besides those targeted by the FOGO schemes.	See Section 1.3 in the Revised EIS
22.9	Green waste trial and roll out started – will reduce CRS waste	This is an opt in program at a cost of \$50. The uptake is unknown and the removal of up to 13% of the volume from red lidded bins remains to be seen. CRS is perfectly willing and able to separate greenwaste and send to the future FOGO reprocessing facility to ensure it does not go to landfill as it currently does	See Section 1.3 and 2.4 in the Revised EIS
22.10	ACT has already reduced waste to landfill by 30% in the time that the ACT population has doubled	The ACT Government has set targets as a matter of policy. This proposal is a response to that.	No action required
23	Fyshwick Markets		
23.1	Odour, lose business, would close markets	The CRS proposal is some 830 lineal metres from the markets and separated physically and visually by the elevated Monaro highway The Fyshwick Markets are an enormous attractor of people and vehicles.	No action required

No.	Public Comment	Response	Action
		<p>There is an admission that traffic is already congested around the markets. The markets attract cars, trucks bringing produce and even trucks removing rubbish.</p> <p>The CRS Proposal and The Food Markets have only one road in common and that is Canberra Avenue which is a major arterial road. There are no streets in common that would be affected by either development. There is no basis to claim there will be any impact on business as CRS are containing odour to within its boundaries</p>	
24	East Lakes Development		
24.1	Separation only 190- 294m – not considered properly in the EIS	<p>The East Lake proposal was considered in both the noise and odour assessments. The noise levels predicted in table 12 (p19) of the Rudds Noise Assessment were compliant at the Western boundary of the CRS site therefore it will be compliant at the edge of the possible future stage 1 of the East Lakes development. Note that Ipswich street and the elevated Monaro Highway are in between and generating their own noise. The orientation of the CRS MRF is to the north and east to avoid noise towards the west. The predicted noise levels on Ipswich street were also assessed in tables 15 & 16 (p23) and found to be compliant with the limit. “The likelihood of increasing noise levels was minimal, so a detailed long-term assessment was not considered necessary” (Rudds Noise Management Plan for CRS p.23)</p>	No action required
24.2	“may lead to 9000 people living there” (371)	<p>Traffic analysis – planning must have considered the range of land uses available in Fyshwick as the Shell facility was still functioning the timing of formative planning. Rezoning land for residential use and moving it closer to existing Industrial activities and land would mean that those rezoning the land would have considered the impact the existing and potentially existing. In reverse the extension of Hume southwards will put industry closer to residential. The onus here would be on the industry to take appropriate measure as the buffer reduces. This would have been considered by strategic planners. The land at East Lake is currently zoned Industrial IZ1 and could equally be developed for those purposes if the Government strategy changed. This is conceptual at best and if we considered the total plan then the railway station location for example will have a greater impact on new residential than our freight terminal</p>	No action required
24.3	Odour impact on East Lake	The odour assessment and mitigation measures have been designed to minimise vented	No action required

No.	Public Comment	Response	Action
		<p>and fugitive emissions from leaving the site. The proximity of the East Lake Mixed Use zone was acknowledged in Section 2.2 of the Odour Assessment. The EPA has had the following to say regarding the odour assessment and modelling contained in the EIS:</p> <p>The Environment Protection Authority (EPA) has reviewed the odour assessment report by The Odour Unit (TOU) and has no concerns with the modelling methodology including the odour emission levels. The odour emissions inventory for the proposed MRF have been derived from an odour emissions factor based upon past measurements of actual emissions taken from a Municipal Solid Waste transfer station located in Sydney and are comparable to the levels which have been used for the expansion of the Mugga landfill facility.</p> <p>The proposed facility is fully enclosed and odour mitigation is by stack dispersion. Modelling has been undertaken based on a stack height of 21m and an exit velocity of 20m/s which equates to the MRF shed undergoing an exchange of 5 air changes per hour, equivalent to a total airflow of approximately 410,000 cubic metres per hour.</p> <p>TOU has used the NSW EPA 2 odour units (OU) (99%, 1-sec) odour criterion for sensitive urban areas with a population greater than 2000 and/or schools or hospitals which is a conservative benchmark for this assessment. Under the NSW guideline an odour criteria of 7OU could be justified for an industrial area and in TOU's opinion, the mixed use industrial zone would be less sensitive and would almost certainly tolerate higher odour exposure.</p> <p>The EPA agrees with the TOU's findings that based on the odour criterion of 2OU (99%, 1-sec), this assessment found that no adverse odour impacts at sensitive places are likely for the proposed MRF.</p> <p>Modelling indicates near full compliance with our self-nominated odour impact assessment criteria of 2OU (99%, 1 s) derived from NSW EPA, which would indicate activities on the site will not cause environmental nuisance. This is based on the proposed full enclosure of the</p> <p>According to the staging plan the release of Stage 1 is the closest to the CRS proposal. No details are available to ensure that the preferred planning documentation from 2010 is still correct or if the land use will remain as drawn. CRS has determined that its noise and odour generation is limited to on site therefore the impact on East Lake is not considered relevant regardless of whether it goes ahead in the current advertised form or some other form.</p>	
25	Impact on Dairy Flat Road		
25.1	Not assessed in EIS at all	It is difficult to assess or consider a development that is yet not in existence and the only	Referenced now in

No.	Public Comment	Response	Action
		information available is a map reference to it in the East Lake plan. It is referred to as stage 8 (last stage) of that plan and would seem to retain it industrial focus. Newspapers and the website have alluded to significant patronage already but there seems to be no traffic analysis available. A brewery is in existence and given the separation distance involved in the separation guidelines - it should be at least 250m – 500m from the proposed residential development	Section 6.1
25.2	Impact on “capital brewing”	As above in 25.1	No action required
26 Impact on Jerrabomberra Wetlands			
26.1	No proper Hydrological assessment (102) (394)	The impacts of stormwater were considered by WSP (and previous studies) in terms of remediation and construction. Cardno and Arcadis also looked at the stormwater arrangements post construction and existing. There was also analysis of the separation of stormwater collection from leachate generation inside and outside the MRF building. There are also forward commitments for testing stormwater during remediation and during construction until the operation and waste handling occurs in the contained and bunded building and the remained of the site is sealed and drained to Ipswich street. An OEMP will also be prepared before licencing and operation to monitor and clean external surfaces, fence lines and drains regularly.	See Section 6.7.3 in the Revised EIS
26.2	Further study recommended in 2009 – not done (394)	Noted.	No action
26.3	Wetlands already affected by runoff (042)	Noted.	No action.
27 Stormwater			
27.1	Need to describe the stormwater system better	<p>During the construction phase Arcadis as a subconsultant to Cardno (See Appendix H) makes the following assessment about the residual onsite contamination: - “There are hydrocarbon impacts in the upper metre of soil at the site. Accordingly, it will be important to ensure that any exposed or stockpiled soils are managed to prevent dust generation. Similarly, stormwater collected in excavations or in bunds around stockpiles is likely to be impacted with TRH and BTEX compounds and should not be discharged to stormwater without testing prior to disposal”.</p> <p>The contamination on site is addressed by WSP in (See Appendix G) its Remedial Action Plan (RAP). Section 7 of that assessment by WSP addresses specifically the management of soil during construction and the detail of this would be developed in a Construction Environmental Management Plan (CEMP) as part of the Construction Management Plan (CMP).</p>	See Section 6.

No.	Public Comment	Response	Action
		<p>The subject site incorporates large portions of hardstand in its design to accommodate waste truck circulation. As such, large downpours may result theoretically in contaminated stormwater and waste water egressing the site. Overland flow and untreated stormwater could pick up various pollutants including solid material, organic matter and chemicals. Untreated stormwater can be associated with various environmental impacts such as algal blooms, erosion, increasing sediment disposition and the disruption to aquatic species. Also, given the nature of the proposal, the production of some leachate within the building is almost certain. Leachate is any liquid that has come into contact with waste or waste processing areas. Based on Cardo's previous experience, facilities like that of the proposal produce approximately 2,000L of leachate each day. This accounts for liquid from the waste itself and wash-down water used to clean the MRF building. Leachate can contain high values of dissolved solids, chemical oxygen, low pH levels, volatile organic compounds and heavy metals. If not handled properly leachate can cause severe environmental issues.</p>	
27.2	Fails to consider the Jerrabomberra wetlands management plans	<p>The Jerrabomberra Wetlands are 1.5km away from the site. The Jerrabomberra Wetlands Nature Reserve Plan of Management (2010) makes no reference to the site or uses related to the proposal. The Wetlands Management Plan does contain protocols for industrial spills. These protocols along with the recommendations of this EIS.</p>	No action.
27.3	Liquid waste onto the floor – risk to the stormwater and sewer	<p>This is fully bunded to form a separate system within the shed. The shed drainage goes to a leachate tank and is not connected to stormwater</p>	No action required
27.4	There is a high potential for stormwater to enter the sewer	<p>These are two separate systems and not connected and a matter for Icon water I the design at the development application stage. Keeping waste activities inside the building separate from outside is a clear delineation. No stockpiling occurs outside. The detailed design will incorporate the reusable existing stormwater feature s and include new pipes and drain as required. This aspect will be again reviewed at the DA stage for effectiveness and ensuring that there is no cross over between stormwater and sewerage as need to be the case in every development.</p>	No action required
27.5	Contingencies must be assessed in more detail	<p>Contingencies have been detailed in Section 6.11 and have been outlined throughout this document as mitigation measures. The mitigation commitments have been listed in Section 7.2 of the EIS. It should be noted that the planning process requires a development application stage and licensing stage which will incorporate more detail when the operating conditions are included in any consent.</p>	See Section 7.0 in the Revised EIS

No.	Public Comment	Response	Action
28	Undesirable Precedent		
28.1	“Will alter the status quo” (039,090,093,122,125)	There is never a “status quo” as suburbs and indeed Fyshwick are always evolving. Fyshwick has just begun to emerge from a flat rent period and faces competition from other suburbs and land releases. Ultimately the permissible land uses are the controlling factor. The site was once a fuel distribution centre with a rail connection. It has many potentials uses and the owners are entitled to explore those lawfully as are all other landowners in Fyshwick. The site is zoned for industrial activity and the shell block has a lease purpose to match.	No action required
29	Consultation		
29.1	“hundreds of people have attended meetings” and are against it (029,077 &144)	Approximately 200 attended the first meeting which involved WtE. When this component was removed from the proposal the meeting sizes dropped to less than 25. Several meetings were held by the proponent in late 2017 and early 2018 that targeted active groups and resident. Acceptances were less than 20 and a site visit was attended by 8 persons. Not all people who attended meeting have been opposed nor have they remained opposed. It is true to say that there have been 8-10 committed objectors who have attended all meetings and have been active applicants for information under the Freedom of Information Act as well as prolific letter writers to all branches of government, both elected and bureaucratic.	No action required
29.2	“extensive community consultation has met with overwhelming concern” (146)	Concern does not mean opposition, nor does it mean that concerns cannot be mitigated. This is not a unique development in terms of waste management, so the management of environment risk has been dealt with previously on other sites and situation throughout the world and by the JV partners locally. The EIS process and an extra-long period of public notification (45 working days instead of 30 days) have allowed for those genuine concern’s to be conveyed to CRS and CRS has spent considerable time adding detail, explaining mitigation measures and clarity.	No action required
29.3	Inadequate public consultation or awareness	It is incorrect to say there was “no warning or consultation” Other submissions above allude to the volume of people who attended meetings and even use the phrase “extensive community consultation” and “hundreds of people have attended meetings”. Since mid-2017, there has been extensive coverage in print, radio, TV and online. CRS has conducted door knocks and 2 rounds of letter drops. They have attended meeting with schools, businesses, community and neighborhood groups, political institutions, politicians etc. There is surprise in this proposal.	See updated detail in 2.4.
29.4	Issues in submissions (302) – affects all of Canberra	Noted – therefore there is an EIS and statutory process. It has been well advertised and publicised over 18months in local resident groups and newspaper’s so the opportunity for “all of Canberra” has been available to contribute. The response to the draft EIS suggests as much	No action required

No.	Public Comment	Response	Action
30	Cost to Taxpayers		
30.1	How long will it operate (101,279	CRS estimates that it can operate indefinitely, if it can be continuously adapted to meet the market needs. The facility is not a complicated structure and will simply be updated and maintained.	No action required
30.2	No discussion of decommissioning?	It is impossible to guess were any business will be in a generations time. CRS see that there will be no need for decommissioning and the facility will adapt to the ever-changing waste management requirements. Should the site become redundant then CRS would have the building cleaned of all waste residues and remove equipment and then independently audited to ensure that it would be safe for other industrial activities	No action required
30.3	Operational risk – Significant risk if the business venture collapses and the contracts it had been awarded to collect and dispose of all household waste	CRS is not proposing to collect rubbish only be a destination for the collection trucks. There is no risk as CRS are confident in the business viability. The situation can occur, as it did when Mugga Lane was almost full in 2014 and trucks were diverted for some time to the other landfill at Belconnen, and the collection trucks are directed, and adjustments made. This can happen in any venture, but it is not a significant risk. Generally, as the price of disposing of waste goes up more and more facilities are required to deal with it. CRS has deliberately proposed a flexible design such that it can adapt to changing markets. If the facility was to become redundant the waste management scheme of things, then a large building is perfectly adaptable as the internal equipment can be removed. In CRS's experience this will not happen, and should the ACT introduce its proposed levy in line with the rest of Australia then the reprocessing of wastes and reuse will be bolstered, and new facilities will be required.	No action required
30.4	NSW Govt may change the levy arrangements at Woodlawn	Waste that is not generated in the Sydney region is not affected by the NSW levy. Currently, according to ACT NoWaste, approximately 30,000tpa of ACT's waste is already going to Woodlawn. Should anything change at the NSW end it would mean that this volume may have to be added to that tipped in Mugga Lane.	No action required
30.5	Rail rates could increase in the future or additional carriage conditions	This has been considered. The cost of landfilling and transport has been increasing over the years, so these are factored into long term modelling.	No action required
30.6	Revenue from recyclables could fall	This is always possible and has already occurred in some markets. Having the ability to be flexible in the sorting and separation processes to adapt to the qualitative aspect of recycling is important. This issue will affect every potential recycler including Government. CRS is focused on sorting and is used to changing reuse commodity markets. The rail is import in keeping this efficient and affordable.	No action required
30.7	CRS could face costly legal action if the local Fyshwick businesses were affected	CRS, if granted approval and operates lawfully and within its approval conditions and licencing which is the objective, then this will not be an issue. CRS is interested in having good relations with neighbours and is designing its proposal to mitigate any potential	No action required

No.	Public Comment	Response	Action
		nuisance	
30.8	Disruption to operations would require a costlier resorting to alternative facilities	This could be said of Mugga Lane, the Yellow lid bin MRF, proposed FOGO facility etc.	See Section 6 of the revise EIS.
30.9	NSW Govt could withdraw the railway \$1m grant	There has been nothing but a positive attitude from the NSW Government to establishing freight rail facilities. This has been supported by a 20-year lease to CRS to establish and operate the facility	No action required
30.10	Lack of business case for the current location (except they own land and have a business adjacent) Locating closer to the border on the same line would be better and more expensive	CRS has established its own business case and has not sought public monies or land contributions in relation to the MRF. CRS has bought Block 9 Section 8 and seeks to purchase Block 11 Section 8. They also have entered a 20-year lease with TfNSW of the railway land. These types of commitments are on a basis of an achievable business case. CRS is confident it can make the proposal successful as a recycling facility and business venture.	No action required
30.11	The proposal will restrict the funding that is currently received by the Territory from the Mugga Lane gate fee (005)	The ACT government has put in place the mechanisms for a waste levy. Most of Australia uses this system to create revenue to fund recycling and other waste management initiatives. The ACT has no levy currently and has flat line recycling for 10 years. The ACT Waste Management system is effectively a monopoly and does not benefit from significant competition. There are some 5 landfills outside of the ACT that currently receive segments of ACT's landfill wastes so despite the Mugga Lane monopoly it does not capture all the waste residues in any event. Recent policy proposals by ACT NoWaste suggest that new initiatives are required to increase recycling, and these may include WtE, Composting schemes and RDF fuels from waste. All these ideas have been proposed at some stage by CRS, so it is difficult to argue that proposing alternate facilities that the Government itself has proposed is a cost. ACT currently has some of the cheapest disposal – this will change if alternate processing is required. Government is seeking private sector involvement and investment so the revenue models will need to change for this to happen.	No Action Required
31	Visual Amenity		
31.1	Impact on visual amenity claimed	Figures 33, 34 and 35 In the EIS clearly show no visual intrusion form the west and east which as the vistas that can be seen. Currently several large white fuel tanks are very prominent on the site and dominate the visual amenity. The proposal will be a modern industrial structure entirely in scale with buildings surrounding. CRS considers the proposal will enhance the visual amenity not detract from it.	No action required

No.	Public Comment	Response	Action
32	Alternatives		
32.1	Rail corridor unavailable (279).	<p>Railway Track Interruption: Programmed rail maintenance is already scheduled into the rail use as the track is shared by daily commuter use.</p> <p>A catastrophic rail track event that closed the track for longer than 3 days would necessitate the transfer of containers by road to Woodlawn. The intermodal containers proposed can be carried by non-specific container trucks which are readily available for sub contract at short notice. This would add two extra truck movements per hour for the duration of the emergency and would be an unusual circumstance that would affect all rail activities into Canberra.</p>	See Section 6.11 in the Revised EIS
32.2	Equipment failures	<p>There are two items of key fixed and mobile equipment that should there be any equipment failure there will be an operating alternative such that operations can continue.</p> <p>The duplicate items include double in and out weighbridges, multiple in and out doorways with fast closing doors and wheel baths. There will be two separate processing lines with by-pass arrangements should a specific conveyor belt or piece of equipment fail. There will be two waste compactors to load shipping containers. The ventilation system will utilise two variable speed extraction fans that will operate at 75% capacity such that if one was to fail then the other can be operated at greater capacity while the other is serviced or replaced. There will be at least two items of each equipment such as forklifts, loaders and excavators to allow operations to continue. These will have service contracts/replacement arrangements from suppliers to allow operations to not be affected. CRS will carry a range of critical parts for all equipment to minimise downtime. It should be noted that there is a minimum of 8 hours everyday downtime where servicing and maintenance can occur.</p>	See Section 6.11 in the Revised EIS
32.3	Serious fires	<p>The serious fires that have been newsworthy of late have been domestic recyclable MRF's and metal recycling yards. These facilities tend to be outdoors, stockpile significant material, have no fixed firefighting systems or are not purpose-built facilities.</p> <p>The focus is on prevention such that any fire incident cannot occur or is small and contained rapidly before any formal intervention by the Fire Brigade is necessary.</p> <p>Benedict Recycling has developed an in-situ thermal camera fire prevention system for its enclosed facilities. Benedict has invented the system and has it installed in its Unanderra facility and is next being installed in Newcastle and then the other Benedict facilities'. The system is an automated back stop in case something is missed in the receipt and sorting phases. It is not intended to stockpile waste so the time it is in the facility is already reduced. In the event of there being any (the locations are already identified in Figure 10 of the EIS) rise in temperature of a stockpile the automated fire system operates as follows:</p> <ul style="list-style-type: none"> • Rise in stockpile temperature above 68 degrees in a matter of minutes is identified by fixed thermal cameras (Cameras can "look" 6m deep into a stockpile) 	See Section 6.11 in the Revised EIS and Appendix X

No.	Public Comment	Response	Action
		<ul style="list-style-type: none"> Water Cannon/Sprinkler is triggered to target the stockpile and drench the hotspot The camera assesses the temperature constantly and will repeat the process if necessary System triggers phone alerts to management <p>There is no incentive to overly wet the stockpiles as it is harder to process and creates leachate. The prevention of inappropriate waste acceptance is key, and the technology is used as a backstop. Together, the risk of fire is minimised and therefore fires, and business shut down is avoided.</p>	
32.4	Power failure (366)	See modified Section 6.11 Access and connection to portable generators will be part of the OEMP and will be organised with a local hire company for short notice deployment	See Section 6.11 in the Revised EIS
32.5	Rail equipment unavailable (366)	CRS will own its own containers and will lease, by long term contract, the locomotives and carriages required with appropriate service and replacement arrangements.	No action required
33	Direct Sale		
33.1	Not a lawful process	CRS have followed the advice of the various Government departments and have invested significantly in ensuring proper planning documentation is produced in accordance with the relevant processes at required. CRS has relied on the ACTPLA processes and advice in the development of the proposal since 2015.	No action required
33.2	Invalid development consent on Block 11, Section 8 Fyshwick.	CRS does not agree. This Consent has been rescinded and this has been challenged in the courts in 2018 and a judicial decision will be made in the first quarter of 2019	No action required
34	RFT not lodged? (450)		
34.1	RFT not lodged? (450)	A Development Application for an RFT and Freight Transport Facility (FTF) was lodged on 21 December 2018 (DA201835108). The MRF still requires a Development Application should the proposal pass the EIS stage.	No action required
35	Financial status of proponents not assessed (109):		
35.1	Financial status of proponents not assessed (109):	This is a private venture involving long running and large companies. Details are referred to in Section 1.2.	See Section 1.2
36	Anti-competitive outcome (014)		
36.1	If the CRS proposal were approved, it would be difficult, if not impossible, for other companies to provide similar services at the same or lower cost	It is already a Government monopoly – will provide market-based solutions, alternatives and competition.	No action required

No.	Public Comment	Response	Action
36.2	Financial benefit only to CRS (029)	CRS is taking all the risk and costs. The ACT Government and therefore the taxpayers benefit from \$50 - \$60m of capital investment they do not need to fund or operate. This is significant. The ACT community also benefits from improved landfill diversion and zero emission goal reduction as well as local employment in the construction and operation phases as well as associated business opportunities to suppliers of consumables and services.	No action required
36.3	Creates a monopoly and increase prices so CRS should allow potential competitors to access its facilities	There is already a monopoly in the ACT waste market place. Competition and alternatives in any commercial space should promote better and competing services. There is no suggestion that Mugga lane must close – CRS is proposing recycling facilities that currently do not exist and in fact could be complementary to achieving long term policy objectives for the Government	No action required
37	Waste Production Levels		
37.1	ACT does not produce 300,000tpa waste (029)	The 300,000tpa is based on the ACT NoWaste market sounding figures from 2015. The tonnage has also been projected for future growth before start-up and is also a maximum volume used for conservatively determining the maximum/worst possible impacts of the proposal business for the EIS assessment. Should the tonnage need to grow beyond 300,000tpa in future years it would require another application process.	See Section 2.4
37.2	Discrepancy between ACT NoWaste and CRS Mugga lane figures (005)	CRS utilised TCCS data provided for the marketing sounding to industry in 2017. This showed a figure of 309,000tpa. ACT NoWaste has said since that the number is 240,000tpa and some 170,000 would be the C&I number. CRS has taken a long-term perspective and maximum case perspective as the EIS needs to address the maximum environmental impact proposed. The financial viability of the facility does not rely on 300,000tpa. The reference to discrepancies between the ACT NoWaste potential paper recovery figure (1,190tpa) and CRS's figure (11,897tpa) is simple as the CRS "Paper" tonnages include potential recoverable cardboard. The CRS figures are factored for growth while the ACT NoWaste numbers are from 2015. The potential total diversion of paper and cardboard stated by ACT No Waste is 14,285tpa (8.4%) in 2015 which is actually the same % ratio proposed by CRS for C&I. The recoverable fractions from the MSW waste stream are based on audits conducted by ACT NoWaste and provided in the Market Sounding information. The successful recovery of things like paper will be dependent upon contamination and the separation methods proposed. It is not clear how the ACT NoWaste determined the recoverable proportions	See Section 2.0 of the Revised EIS
38	Inquiry Panel		
38.1	Request an independent Inquiry Panel (030,039,090,093,122, 125)	This is determined by the Minister	No action required

No.	Public Comment	Response	Action
39	ACT Rail Freight Strategy		
39.1	Will monopolise the southern shunt line	The lease agreement with John Holland does not permit exclusivity	No action required
39.2	Not consistent with the Rail Freight Strategy	The rail discussion in the Freight Strategy discusses the fact that Kingston will be absorbed by the East lake development in the future. It suggests looking at other options along the corridor and does not rule out Fyshwick	No action required
39.3	No Obstacle to freighting waste from Sydney (276) (366)	CRS has based all its calculations on the ACT and surrounding region waste management scenario. ACT NoWaste has indicated that distant markets for PEF is possible and waste is already tipped in NSW at Woodlawn. The proposal is to process Canberra's waste and provide a recycling solution where there is currently none	No action required
40	Other Risks		
40.1	If the development was not to continue then	Mugga Lane could be used as it would still be operating at a reduced scale, it would still have its consents and it would have a significantly greater operating life therefore it would remain an asset to the ACT for longer. There is no reason it would become more expensive.	No action required
40.2	Capacity of Woodlawn over time - what if the consent is withdrawn	This can't happen in NSW provided compliance is maintained – The landfill is privately owned and run - compliance is part of the 20-year running history. Landfill will always fill up by nature and the speed of this is dependent on what diversion and recycling is put in place. Woodlawn has already added the ability to compost waste which diverts waste received from the landfill. This in turn affects the longevity of the landfill. It is currently receiving about 30% of Sydney's domestic waste and has a licence to receive 1.1mTPA. At capacity it receives 900,000TPA by rail which leaves capacity to receive other wastes. There are road limitations and there are also road contributions by Veolia to Palerang Council for road upgrades on the southern side.	No action required
40.3	Not desirable to have household waste double or triple handled [Fogo) – added cost to the waste disposal needs to be estimated so that the community can assess that its waste cost will not rise	Greenwaste is an opt in system, so the total volume of uptake is unknown as its user pays. The FOGO collection and processing is also a concept that has no detail on service delivery, uptake, contamination etc. Regardless CRS would work with ACT NoWaste to deliver the Waste Strategy outcomes as quickly and as best as possible	No action required
40.4	Omits the fire risk on the site	Addressed in section 6.11.1, 6.11.2.1, 6.11.3.1 6.11.4.1	See Section 6.11 of the Revised EIS
40.5	Emergency spill management	Form part of the OEMP required for licence approval. Spill Kits will be provided in the MRF building and staff training provided in their safe use. Liquid wastes are not accepted at the	DA and Licence stage

No.	Public Comment	Response	Action
		facility	
40.6	On site accidents	Will be included in the induction and OEMP that will be required for licence approval	Licence Stage
40.7	Disruption to operation	See section 6.11	See Section 6.11 of the Revised EIS
40.8	Weighbridge Operations being rorted (121)	There are many checks and balances – it is wrong to assume this will happen when the companies involved operate many weighbridges across many businesses, enough to know what to do	Licensing stage
40.9	Unacceptable that the Site Operating Plan is not included in the EIS (121)	A model CMP and OMP has been attached but the detail is always developed between the DA and licencing stages as it need to take on board accurately the conditions of consent. A draft would be submitted with the DA for consideration and completeness by ESPDD and the EPA.	See Appendix P
40.10	Gas Bottle through shredder (121) as happened at Access Recycling 13/12/16	This happened in a metal recycling yard in South Australia and is a common occurrence in metal recycling facilities. CRS will not be shredding metals	No action required
40.11	Clyde and Banksmeadow were recently fined for stockpiling waste (121) and they are not meant to either?	CRS is not responsible for the operations of other facilities and are not privy to the details, suffice to say that these facilities operate across the world and a regulated strictly, so the correct operations is part of the licencing process and obligation. Between those two mentioned facilities they process some 900,000tpa which is three times the volume proposed by CRS. CRS is processing in a much larger processing facility space with less volume	No action required
41 Compliance with the Planning & Development Regulation 2008			
41.1	Sec 50 (2) (b) EIS requires a glossary of technical terms, abbreviations and acronyms (250)	This was provided in the initial draft EIS and has been added to and improved in the revised EIS	See page ix of the Revised EIS
41.2	Sec 50 (2) (c) (ix) The regulation requires that implementation time for the proposal be included (250) (12)	The time frames for this type of development are broad. The calculations throughout the development have made assumptions of a 2020/21 start. The Planning process continues and will be followed by a development application process and then a construction period. A clear statement can now be found in the EIS is Section 2.4.6 2015 – 2019 Planning Processes including Scoping, Draft EIS, Revised EIS, Ministerial Decision or referral, possible Inquiry, RFT Development Application, MRF Development Application	See Section 2.4.6 of the Revised EIS

No.	Public Comment	Response	Action
		<p>2020 MRF Development application, design detail, construction tenders, CMP OEMP, Remediation finalisation and testing program</p> <p>2020 – 2021 Construction and Licensing</p> <p>2022 Operational Phase including EPA and ACT NoWaste reporting as required, OEMP day to day requirements, Annual licencing</p> <p>The above timeline demonstrates that the facility can be operational as soon as 2022. WE see this facility as a key piece of the ACT’s waste solution to achieve 90% landfill diversion by 2025. Decommissioning of the facility is unlikely to be required due to the machinery reaching the end of its useful life. This is due to the ability to maintain the building and equipment indefinitely, with replacement of mobile plant every 10,000 hours or as required. Should the facility become redundant due to less waste generated or advancements in waste management the building would be cleaned internally with machinery and equipment removed. The site would then be subject to an independent audit to ensure that the building could be utilised for a different industrial use.</p>	
41.3	Sec 50 (2) (d) (ii) Must include details of alternatives to the proposal (250)	There is no minimum or maximum number of alternatives in the Regulation. The discussion regarding alternatives to the proposal has been upgrades and can be found in Section 2.6 of the EIS where site selection criteria, Mugga lane landfill expansion, alternative rail connected sites and alternative processing are all discussed	See modified Section 2.6 in the Revised EIS
41.4	Sec 50 (2) (d) (iii) Must include the criteria used for assessing each environmental impact	The criteria used to assess environmental impact is a standard risk assessment criterion which has been explained under section 5.0 risk in the EIS document.	No action.
41.5	Sec 50 (2) (f) Must identify the potentially significant impacts identified in the scoping and identify the environmental values, investigation findings, description of the effect and mitigation of offset measures involved (250)	<p>The potentially significant environmental impacts are now fully addressed as per the Scoping document. The issues have been listed as described and assessed with relevant consultation information n included and mitigation measures discussed.</p> <p>These discussions now fully mirror the scoping document therefore the process of assessment</p>	See the Revised EIS
41.6	Sec 50 (5) requires the EIS to be prepared in accordance with requirements set out in the scoping	The EIS has been prepared in accordance with the requirements.	Refer EIS cross reference table provided at

No.	Public Comment	Response	Action
	document (250)		Appendix T.
42 Compliance with the Scoping Document			
42.1	Scoping Requirement states that digital files must not exceed 10MB each (250)	This has largely been complied with and one document was split in two to make it more manageable. The file size reduction comes at a cost of clarity where graphs and pictures are involved, and CRS has attempted a balance.	Noted
42.2	Draft EIS fails to “sufficiently” address each matter raised in the Scoping (12)	This is a process and the “sufficiently” is determined by EPSDD. The EIS has been prepared in accordance with the requirements.	Refer EIS cross reference table provided at Appendix T.
42.3	5.1a Failure to address the objectives and justification for the proposal (12)	The objectives and justification of the proposal has been explained in Section 1 of the EIS.	See section 1 of the EIS.
42.4	5.1h Failure to provide a description of the proposal and outline other developments in the area or region that may be affected by this proposal (12)	<p>Specific mention was made here of Dairy Flats and East Lakes developments. Consultants did take what is known of these proposals into account as much as possible, however, details are scant.</p> <p>The known detail and similar questions are answered later in the report specifically and have been included in the Planning and Land Status risk assessment of the EIS (Section 6.1). It should be noted that affected land for both these sites have remained zoned Industrial IZ1 under the Territory Plan to this day and this has been the case for the last ten years. These are not rezoning’s, EIS’s or Development Applications at this stage so the specifics are not in the public domain nor confirmed. Should these sites be rezoned to mixed use and commercial as was indicated in 2010 than it would be with the knowledge of land adjacent to an industrial precinct already exists with the potential impacts of existing operations. CRS has a legitimate planning application in the system whereas the status of the other site remains unclear, but they have been considered regardless</p>	See Amended Section 6.1.
42.5	5.1i Provide a description of the proposal including predicted timescale for implementation (design, approvals, construction and decommissioning) (12)	<p>Whilst this is an important aspect the timescale is arbitrary and dependent entirely on the planning processes. Every time frame has been extended on behalf of the public so locking into specifics is pointless. Typically, this can take 5 years depending on planning. The construction will take some 18 months and then it will take some time ramp up business, there is no decommissioning plans as CRS see this as an ongoing business that will refit and adapt with the times.</p> <p>The calculation by CRS have made assumption for the years 2020/21 as this was the expected operation date. This may well stretch to 2022 based on the speed of the Planning</p>	See Section 2.4.6 in the Revised EIS

No.	Public Comment	Response	Action
		process	
42.6	5.1k Description of the construction methodologies for the proposal (12)	The design detail will be submitted as part of any Development Application. Construction methods will be bound the Building Construction Code of Australia.	No action.
42.7	5.2 Alternatives to the proposal and reasons for selecting and an analysis for selecting were not attached to the EIS (12)	These were included in the EIS under Section 2.6. This has been amended since the Draft EIS	See Section 2.6 in the Revised EIS
42.8	6 Legislative Context missed important reference to Waste Management and Resource Recovery Act and the EPA EPP Contaminated Sites Guideline. Territory Plan tables relating to railway use was not described (12)	<p>The Waste Management and Resource Recovery Act has been included in the Legislative discussion in Section 3.5.8 of the EIS. Any relevant section of the ACT has been highlighted, a list of the relevant licencing requirements addresses and acknowledged and a list of the Categories of waste to be accepted is included.</p> <p>EPP's are a policy document which are issued by the EPA and are not legally binding but rather explain the Act. Future development of the site will comply with EPA legislation and will therefore respond to the requirements of the EPP.</p> <p>A discussion of the Territory Plan was included in Section 3.3 and reference to the zoning permissibility on the site and the adjacent railway land is included. Discussion relating to "railway use" and what is proposed has been included in this Section (3.3)</p>	Refer Section 3 of the revised EIS.
42.9	8.1.1 Missing references to railway use being prohibited on Block 11 Section 8 (12)	<p>Railway Use is not being proposed for Block 11 Section 8. The railway activities are to be conducted on Block 11 Section 47, which is adjacent, and the subject of a separate development application (DA201835108).</p> <p>The MRF activity will involve containerisation of waste residues and recyclable and these containers can be transport by road or rail as they are intermodal configuration. The activity of loading and unloading of trains can only happen where the railway track is, and it is some 18.4 m away from the boundary of Block 11 Section 8.</p> <p>The RFT activity is mentioned in the fullness of transparency and allowing the total environmental impact to be considered the actual RFT activity and construction is a separate DA process.</p> <p>Section 3.3.1 of the EIS has been amended to include discussion of the blocks and their permissible land use activities</p>	See Section 3.31 of the Revised EIS
42.10	8.1.2 No details of transit routes, number of loads.... A comprehensive TIA should have included analysis of traffic hazards, road safety risks and Monaro highway intersection concern (12)	The required traffic impact was done for this proposal. Supplementary crash severity plots discussions for 2012-2016 have also been provided in Section 1.2 of this appendix and in Section 6.2 of the EIS	See Section 1.2 of this appendix and Section 6.2 of the Revised EIS
42.11	8.1.5 No assessment of landscape and visual	The landscape and visual assessment have been discussed in Section 6.5 of the EIS and CRS has now included "existing" and "proposed" photographs to demonstrate the actual improved visual amenity. The removal of the existing large white fuel storage tanks and	See Section 6.5 of the Revised EIS

No.	Public Comment	Response	Action
		plant and replacing it with a modern style “Bunnings” style building, with no openings that face the street and all proposed waste operations conducted in a large building, are deemed to be significant improvement.	
42.12	8.1.8 No Air Quality study provided and the odour study did not consider dust and diesel fume emissions and their health impacts - reference to East lake and Molongolo	<p>An air quality study and report has been included as a supplement to the Odour report with focus on dust and other matters raised in the public submissions other than odour. The major issue prior to lodgment was odour and since the public has responded a supplementary air quality assessment was done on dust and truck fumes. CRS had already conducted background dust monitoring in 2017 so the report and results have now been included in Appendix Q</p> <p>Several questions raised by the public have been specifically answered in this Appendix by Todoroski Air Sciences. Their study conclusion is below in relation to dust</p> <p><i>“This study has examined the likely air quality (dust) impacts resulting from the operation of the Project. Air dispersion modelling was used to predict the potential for off-site dust impacts in the surrounding area due to the operation the Project. It is predicted that all the assessed air pollutants generated by the operation of the project would comply with the applicable assessment criteria at the identified sensitive receptor zones and therefore the operation of the Project would not lead to any unacceptable level of environmental harm or impact in the surrounding area. Overall, the assessment demonstrates that, the Project can operate without causing any significant air quality impact in the surrounding environment.” Appendix Q</i></p>	See Amended Section 6.8 of the Revised EIS and Appendix Q
42.13	8.1.9 No legitimate HIA has been done that satisfies the Scoping or ACT Department of Health (12)	<p>A revised HIA assessment has been conducted. This has now been amended as the supplementary air quality assessment and the ground contamination reports have now been included.</p> <p>EnRiskS have made the following assessment based on the inclusion of the air quality and ground contamination assessments in conjunction with the previous report :<i>“The HIA has considered the operation of the proposed project and potential impacts to the health of the off-site community. The assessment has considered a range of issues that have the potential to affect the health of the community (either positive or negative), which relate to changes to noise, hazards (including fire, hazardous waste and bushfire risks), air quality, odour, traffic, visual landscape, pestilence, contaminated land, economic and social environment. Based on the assessment undertaken, the project is associated with some benefits to the community, particularly in relation to employment. Where negative impacts have been identified, these are considered to be negligible in terms of community health due to the suggested and proposed process design, control, mitigation and management measures to be implemented.”</i></p>	See Revised Section 6.12 a dn revised Appendix L
42.14	8.1.11 Examples of similar developments not included (12)	<p>Section 2.9 of the EIS Document reports as follows:</p> <p>Much of the industry in Australia has been a progressive morph from landfill to now landfill avoidance. Much of the technology introduced has been successfully implement in Europe where landfill has been scarce and expensive for a long time. This dynamic is now occurring in Australia and the range of solutions are many, dependent upon philosophy, and where the starting point is. Much of the current infrastructure is a product of adaption and growth. There are several larger scale and volume facilities in the market now, but they are relatively new. The largest investments have traditionally been in landfills and this is changing.</p>	See Section 2.9 of the Revised EIS

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		<p>It must also be remembered that the specifics of recycling are dependent upon the waste stream and the end markets. Canberra has a higher percentage of garden waste in their MSW bins therefore the process of separation and recovery is different to other cities who may have a dedicated greenwaste collection bin service. This could well change in Canberra as green bins are currently being trialled in select suburbs.</p> <p>Table 3 below shows several key examples of similar facilities around Australia. Some of these examples include adaptations of existing facilities which may not be as efficient or effective as a purpose-built facility such as the one CRS is proposing. Finding exact replicas of the facility proposed around Australia is difficult considering the rapid advances in sorting technology. To this end, examples of similar facilities in the UK utilising equivalent sorting equipment as those proposed for the Fyshwick site have also been included.</p> <p>Table 1: Similar Facilities in Australia and Overseas</p> <table border="1"> <thead> <tr> <th>Where</th> <th>Who</th> <th>Tonnes p/a</th> <th>Waste Stream</th> <th>Buildings</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td colspan="6">NSW</td> </tr> <tr> <td>Chipping Norton</td> <td>Benedict Industries</td> <td>300,000</td> <td>C & I, C & D</td> <td>Yes</td> <td>Adapted Commercial Shed</td> </tr> <tr> <td>Port Botany</td> <td>Veolia</td> <td>200,000</td> <td>C & I</td> <td>Yes</td> <td>1997 Purpose Built shed</td> </tr> <tr> <td>Greenacre</td> <td>Veolia</td> <td>200,000</td> <td>C & I</td> <td>Yes</td> <td>Adapted Rail Shed</td> </tr> <tr> <td colspan="6">WA</td> </tr> <tr> <td>Perth</td> <td>Cleanaway</td> <td>250,000</td> <td>MSW and C&I</td> <td>Yes</td> <td>2017 Purpose Built</td> </tr> <tr> <td>Bildra Lake</td> <td>SUEZ</td> <td>80,000</td> <td>C&I</td> <td>Yes</td> <td></td> </tr> <tr> <td colspan="6">VIC</td> </tr> <tr> <td>Altona</td> <td>Transpacific/Cleanaway</td> <td>85,000</td> <td>C&I</td> <td>Yes</td> <td>Commenced 2012</td> </tr> <tr> <td colspan="6">Overseas Examples</td> </tr> <tr> <td>Swansea, Wales</td> <td>Derwent Group</td> <td>150,000</td> <td>C&I</td> <td>Yes</td> <td></td> </tr> <tr> <td>London</td> <td>Powerday</td> <td>200,000</td> <td>C&I</td> <td>Yes</td> <td></td> </tr> <tr> <td>South West UK</td> <td>New Earth Solutions</td> <td>100,000</td> <td>MSW</td> <td>Yes</td> <td></td> </tr> </tbody> </table>	Where	Who	Tonnes p/a	Waste Stream	Buildings	Notes	NSW						Chipping Norton	Benedict Industries	300,000	C & I, C & D	Yes	Adapted Commercial Shed	Port Botany	Veolia	200,000	C & I	Yes	1997 Purpose Built shed	Greenacre	Veolia	200,000	C & I	Yes	Adapted Rail Shed	WA						Perth	Cleanaway	250,000	MSW and C&I	Yes	2017 Purpose Built	Bildra Lake	SUEZ	80,000	C&I	Yes		VIC						Altona	Transpacific/Cleanaway	85,000	C&I	Yes	Commenced 2012	Overseas Examples						Swansea, Wales	Derwent Group	150,000	C&I	Yes		London	Powerday	200,000	C&I	Yes		South West UK	New Earth Solutions	100,000	MSW	Yes		
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42.15	8.1.11 Not all risks have been identified including risks from BTEX vapours. The audit is of the site in its present condition and does not consider post works (12)	<p>The RAP proposed by WSP includes developing a final remediation plan, soil testing once the final design has been constructed that determines the levels of soil disturbance. Any above or below ground tanks are to be removed and the soil tested and then appropriate action for treatment and disposal or reuse dependent on the results. There are already confirmed contaminants to be considered in the RAP and the CEMP. Soil management procedures during construction have been outlined by both WSP and Cardno. Updating the EMP from 2017 will be part of the final design process and the development of effective</p>	Refer appendix G.																																																																																				

No.	Public Comment	Response	Action
		CMP and OEMP for safe operations and practices. These will be development as part of the DA and Licence process for sign off by ACT EPA and ACTPLA before construction	
42.16	8.1.11 The EIS is “unconvincing” on the impacts of the MRF on aircraft (12)	<p>An application was made to CASA outlining the location, height, diameter, temperature and velocity of the air leaving the ventilation stack on the roof of the MRF Building. The application was “worst case” modelled by CASA and written advice was received that the ventilation plume “will not be hazardous to aircraft operations” and there will be “no requirement to include the plume symbol in the aviation charts”. (see appendix M).</p> <p>Canberra Airport also responded to the Draft EIS (see Appendix U) and did not express any objections to the proposal, noting the design elements incorporated to minimise risks.</p>	See Appendix M & U
42.17	8.2.4b No description or prediction of the effectiveness of the air ventilation system, membrane and leachate collection system (12)	<p>The ventilation system capacities are described in Section 6.8 of the EIS and will be designed to have two variable speed fans that allow continuous operations and they will have the capacity to replace the air volume in the shed five times per hour. The system will feature two fans so that maintenance and continuous operation can occur. The effectiveness is discussed in the odour report and the capacity for air exchange is discussed and the recommendations followed.</p> <p>The membrane system has been recommended as a mitigation solution and will meet Australian standards. It will be incorporated in the total design at the DA stage where the proposal and the commitments from this EIS will be carried through to any DA and DA consent conditions. The installation of the correct liner will be made when the detail of the earth works required and the building design are finalised.</p> <p>The leachate collection system is a liquid gathering system that will collect any inadvertent liquids in a holding tank for transfer and/or treatment. The locating of the floor drains and the slop of the flooring, removable drain covers for cleaning etc. are all inside the building and will be part of the detailed design</p>	See Sections 6.6 and 6.8 of the Revised EIS
42.18	8.2.4d EMP should be rejected as not site specific and works only for the site in its current condition (12)	It is proposed to update date this based on the final design and incorporate the key elements on the Construction Management Plan (CMP) and the Operating and Environmental Management Plan (OEMP) which will be submitted before construction to ACT EPA and ACTPLA	See section 6.6 of the Revised EIS
42.19	11. No details of the railway terminal construction were included in the EIS (12)	The rail freight terminal (RFT) was not included in the EIS as this does not require an EIS and as indicted would be the subject of separate application. The RFT, which can operate independently of the MRF, was included in the EIS risk assessment as this is the preferred operational method proposed by CRS (can operate the MRF without the RFT if necessary). It was considered by CRS that the fullness of the MRF development should be discussed even though the railway use was on a different block of land and subject to a different zoning and development application.	See Development Application 201835108

No.	Public Comment	Response	Action
42.20	13.2 The Draft EIS did not include a Scoping Cross reference table and there are other aspects of the EIS that were unclear and legible (12)	This has been included in the revised EIS. The EIS in general has been reviewed to reduce jargon and other technical phrases and terminology to make the document more legible. A reference table has been included.	Refer appendix T.
42.21	8.1.4 Placement of waste affects fire risk and is not clear. What happens if there is an oversupply of the facility - current and future markets for recycled product is not assessed so the economic viability can be assessed (12)	<p>CRS has discussed the various business interruption contingencies that may occur and the various strategies that would be employed. Stockpiling waste is not an option and whilst there is some capacity for this, there is also capacity built into each operating day to allow for catch up, maintenance and by-pass arrangements such that there is little reason to accumulate waste.</p> <p>This facility cannot be compared to the MRF at Mugga Lane as it handles different materials and has different outputs. Other open-air waste management facilities do not have the same firefighting systems proposed and they have other inherent risks (for example metal recyclers have fuels, grinders and hidden car batteries etc)</p>	See Section 6.4 of the Revised EIS
42.22	8.1.7 Ground water quality not assessed, no monitoring proposed and no clear description of stormwater management through construction phase (12)	<p>Ground water was tested in previous environmental monitoring. The RAP proposes soil testing for the remediation program, and it is proposed to manage any identified contaminated soil stockpiles by covering them to prevent wind and rain intrusion and any stormwater from those stockpiles or construction works be tested for quality before being released.</p> <p>A CEMP will be developed and submitted to ACT EPA and ACTPLA before construction</p> <p>This detail flows from the detailed design stage which will occur when a Development Application is prepared.</p>	See Section 6.6 of the Revised EIS
42.23	8.1.10 The acoustic impact failed to consider the Dairy Road and Molonglo developments. There was no consideration of the high-rise, meteorological condition considered and no "wind roses" included in the assessment (12)	<p>The acoustic assessment has considered what is known of the Dairy Road and Molonglo developments, despite their unknown final details. The objective of the acoustic assessment is to consider the noise impact at the boundary of the site. If it is compliant at that point, then the requirement beyond the boundary is unnecessary. The modelling has considered meteorological conditions.</p> <p>There are wind roses included in the Odour Unit Assessment p 17 Figures 3.3 and 3.4 of Appendix I</p>	See Appendix I
	8.1.11 The assessment did not adequately deal with the risk of fires and should be done again to consider social, economic and environmental risks (12)	<p>Fire risk has been extensively addressed. The critical design focus is on prevention and then incorporating an automated system that can stop any spontaneous combustion event before it occurs (waste stockpile heat rises above 68 degrees)</p> <p>The risk of fire at this facility is significantly less than at a landfill or open-air waste facility by virtue of the inclusion of fixed and automate fire prevention and firefighting systems.</p>	See Appendix X