

I would like to register my strong objection to the draft EIS Application No 201700053, the proposal for a Waste Transfer Station at Fyshwick. I bring to your attention some serious issues with that proposal.

The intention of the proposal is to process Municipal Solid Waste (MSW), Commercial and Industrial (C&I) waste and light residues from Construction and Demolition (C&D) and other wastes, totalling around 300,000 tonnes per annum. This waste will be transported to the subject site by existing collection trucks and ALL waste tipping, processing and containerisation will take place within the MRF building (Executive Summary page 1X).

Firstly, the ACT does not produce the 300,000tpa of waste intended as above. Consequently waste will be imported. Most notably, should the CRS Stage 2 Waste to Energy facility proceed (see page 3 of CRS November Scoping Application), the high stable 24/7 temperature required in order to avoid increased toxic emissions could only be sustained by importing waste. With or without an incinerator more waste than we produce will be needed. In NSW with the lifting of restrictions on the distance waste may be transported by road, it is to be expected that waste may well come from outside of this region from well over a 100 km distance as does the Access Recycling metal trucked into the Lithgow Street operation, which forms an integral part of the intended rail freight.

Despite the protestations of the proponent that the WtE is “off the table” it remains available in the government instrument, NI2017-389 as advised by ACTPLA until expiry in January 2019. As noted above the proposal is described in the CRS application as;

This request for a separate EIS scoping document comes after extensive community consultation as part of the process for application number 20170002[5]3, which has influenced our approach to split the original proposal into its key components.

- 1. The Materials Recovery facility and Rail Freight Terminal (MRF)*
- 2. The Waste to Energy facility (WtE)*

We consider the WtE ancillary to the overall solution in that it is dealing with residues from the MRF and does not impact on its effectiveness or viability. As such we are proposing to proceed with an EIS process to be undertaken for the WtE component at a later date.

It is a well-known tactic of project developers to split EIS proposals so the focus is on the first part and the second is overlooked under the guise of an “ancillary project”. The term “ancillary” means providing necessary support to the primary activities or operation, thus the incinerator is suggested as a necessary consequence of the operations of the waste transfer station. Indeed a proper business case including the WtE must be provided. Alternatively, the stage 2 WtE must come out of the process which includes the initial November application for the Scoping Document. It is disingenuous for the proponent to publicly state apart from this process that there is no Waste to Energy proposal.

The EIS must demonstrate that the need for the proposal outweighs all the adverse impacts.

I request that;

- 1. CRS submit a new Scoping Application for the MRF and rail terminal and withdraw any reference to WtE in a future proposal.**
- 2. ACTPLA close down NI2017-389 in the public interest.**

This proposal for the diversion of the waste described above from the semi-rural and heavy vehicle accessible Mugga Land landfill to a petrochemical contaminated, traffic congested site at Ipswich Street in Fyshwick is untenable. The location is in Canberra Central in the heart of our inner south, Fyshwick.

A lot of Canberra residents, with a range of technical and environmental skills have examined this proposal and have expressed real concerns at what they have found and many have told Government about their concerns.

In summary these concerns include:

- The inappropriate location of the proposal
- Adverse social impacts
- Economic negative considerations and
- Environmental risks and adverse impacts

1. Location

The proposed site at Ipswich Street Fyshwick is demonstrably inappropriate compared to the appropriately located Mugga landfill. The Mugga landfill is co-located with an efficient biogas generation installation and a state of the art recycling facility which is continually increasing the kinds of recyclables it can accommodate.

The Fyshwick location has a litany of problems for workers, businesses and customers of the numerous and increasingly gentrifying retail, services and commercial businesses, a number of which are immediate neighbours to the proposed facility.

The location is less than 100 metres from the nearest residence in Wiluna Street, 264 metres from the proposed 6 storied apartment developments at Eastlake (projected to accommodate 9,000 residents), 370 metres from the rapidly developing Molonglo retail, services and residential area, 720 metres from residences at Narrabundah. It is also close to a residential caravan park, the Fyshwick fresh food markets, the Kingston Foreshore development and a cluster of large schools and childcare centres. It's just over 3 kilometres from Australia's national government and parliamentary precinct which includes parliament house.

Clearly this location is just inappropriate.

I request that;

- 1. CRS address the EPA Separation Distance Guidelines for Air Emissions in regard to proximity to residents on Wiluna Street, Fyshwick and**

2. CRS address the EPA Separation Distance Guidelines for Air Emissions in regard to proximity of the future East Lake at least 6 storeys of commercial/residential development

The proponent will find the East Lake development plans on the EPSDD website as advised in May 2018.

2. Social Impact

The proposal has no social licence to operate in this area. It will create a multiple of negative effects immediately. The long list of adverse impacts include:

- Major new traffic problems, noise, dust, odour, air pollution and the inherent mess and aesthetics of the industry outweigh any need for the siting of this development at this location.
- The negative social impact of the location of this industry on this site would fundamentally alter the social amenity of Fyshwick, particularly of the immediate precinct and would send a strong social message to the Canberra business community that the Fyshwick area is no longer a prime area for future high end retail, service and commercial businesses.
- Should this proposal be accepted by government against the wishes of the ACT community, then the precedent will be set for Fyshwick to become a Waste Precinct including for organic waste under this CRS proposal.
- The evidence based *Waste Feasibility Study*, recently released for further comment has outlined a *Roadmap* to drive resource recovery target towards 90%. Recommendation number 2 involves the diversion of organics from landfill. The CRS proposal diverts organic waste from one landfill to another some 70km distance. The Waste feasibility Study proposes the Hume Precinct as a centre of excellence for waste recovery activities.

I request that;

- 1. CRS be required to answer to the *Waste Feasibility Study* Recommendation 2. *Diverting Organics from landfill* and justify, how at least 80% of the CRS waste received including all the putrescible organic waste intended for landfill at Woodlawn, will satisfy the ACT Government's targets for 90% recovery. The bioreactor at Woodlawn is not more efficient than Mugga converting to energy (as provided in [redacted] submission).**
- 2. CRS be required to justify locating a waste facility in the urban IZ2-mixed use industrial (equates to light industry) operation when the resource Recovery Estate is located at Hume and the ACT Government will focus on Hume as a centre of excellence for waste activities.**
- 3. With the ACT Government's intended management of FOGO into kerbside green bins within 5 years how is it that the CRS proposal for waste to Woodlawn landfill**

can be justified in the short term and when it is estimated that 40,000tpa could be diverted from landfill.

3. Negative Economic Considerations

The approval of this project risks fundamentally changing the trajectory of growth and economic development of the Fyshwick Precinct.

- The new industries and commercial activities that have been growing and gravitating to the revitalising Fyshwick Precinct could find this single project so disruptive that they are likely to divert to less suitable areas
- The projected 138,000 new large-truck movements each year could lead to crippling congestion in an already congested area. Particularly the Monaro Highway exits
- This project, if it were to proceed, would effectively derail all the detailed planning and research that has gone into the ACT Government's long range, socially and economically sensitive *Waste Feasibility Study*. This outlines a comprehensive, well evaluated, long term future perspective for the handling of waste in Canberra. Why overturn all that good long term work to rush into a backward looking and economically disruptive solution which merely shuffles waste from one landfill to another some 70km distance?
- If this project were to proceed it could place the security of all ACT waste in the hands of a monopoly provider with all the economic and social risks this would entail.
- There would be a higher risk of disruption of services including the danger of catastrophic fires in a central area of Canberra.

It's easy to conclude that there is not likely to be any net financial or economic benefit to ACT residents and the bulk of the Fyshwick business sector who will inevitably suffer significant financial damage and loss of property value, while Government could place itself at greater economic risk.

I request that;

CRS provide a proper analysis of financial benefit for any other business except itself and any minimal rail freight the proposal is likely to attract. That is, how will the established and surrounding commercial and retail businesses of Fyshwick benefit financially from this waste transfer at their doorstep?

4. Environmental Risk and Adverse Impact

Waste transfer operations, are a significant source of noise, dust, odour and air pollution. This will have a direct effect on local workers and a broad spectrum of businesses within the local area. Some environmental effects are the addition of diesel large-truck pollution and the likely very wide dispersion of foul odours from the facility. This problem would be the

result of the unfiltered venting of air from the facility into the atmosphere at levels below the proposed heights of future developments in nearby East Lake some 264m away.

Canberra's famous temperature inversions would ensure that residents throughout the Inner South would have frequent reminders of the existence of the garbage processing and transfer station in their neighbourhood.

I request that;

CRS provide an adequate air survey which takes into account the occurrence of air inversion over the residences of Fyshwick and the inner south suburbs of Canberra Central.

Additional environmental risks include:

- Adding significantly to the cumulative noise impacts of current metal recycling and other high noise generation
- Additional 460 heavy-truck movements daily to the present high rate of semi-trailer, road-train and B-double occurrences in these streets. Significant pavement and street damage and costs as a result of very high heavy vehicle movements
- Economic and environmental disruption to owners, tenants and customers of businesses due to heavy vehicle traffic
- Additional traffic congestion and major accident risks from entering and exiting heavy vehicles on the narrow and dangerous entry and/or exit point on Ipswich Street
- Over recent years I believe there is already evidence of a number of fires in waste materials stored on this site. The consequences of fires in such a facility could be anticipated and extreme
- I believe this site is only fit for its existing purpose because of the extensive petrochemical use and spills over many years as a fuel depot
- Health risks for employees and visitors related to existing petrochemical presence
- The risk of aircraft bird strike from waste transfer stations within 3 kilometres of an aircraft main runway
- An Air Quality Impact Assessment Report has not been provided

There is ample evidence that this waste transfer facility should not be approved on this site and the ACT Government should understand that the community and businesses in the area including the Fyshwick Markets, strongly oppose such a development. Hundreds of Canberra citizens have attended meetings, they have heard from the proponents and they have made public their decision to oppose the establishment of this facility on this Fyshwick site.

The publically expressed objection and opposition of the community could not be clearer.

Yours Sincerely

