

**Submission Against
Draft Environmental Impact Statement Materials Recovery Facility Fyshwick, Section
8, Blocks 9 & 11 Capital Recycling Solutions**

Application Number 201700053

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The draft EIS for a Materials Recovery Facility Fyshwick, raises significant social, economic, environmental and health concerns and fails to satisfy community expectations. The draft EIS fails to address all these issues in sufficient detail to provide the reassurances that its adverse impacts can be satisfactorily mitigated and/or managed.

For business owners in Wiluna Street Ipswich Street and Lithgow Street the EIS fails to analyse the impact of the proposal on their businesses. Business owners in Wiluna, Ipswich and Lithgow streets are mostly small business people who have invested significant capital into purchasing property and operating their businesses. They have serious concerns that the approval of a waste transfer terminal very close to their businesses will significantly impact on the continuing profitable conduct of their enterprises and diminish the value of their property.

Fyshwick is a popular place at which to shop or visit. The amenity of the south Fyshwick area and wider, will be adversely affected by noise and odour from the facility, from dust and diesel emissions, exposed waste and litter and vermin. Polluting industries causing a degradation of the local environment should be located in a heavy industrial zone not in the light commercial and retail area of Fyshwick's IZ2 mixed industrial use.

The facility will be a 16 hour 6 day a week operation. According to the applicant about 300,000 tonnes of waste per year will be transported through the surrounding area. This intense vehicular usage from a major facility will affect traffic in Ipswich, Wiluna and Lithgow Streets while the intersections of Ipswich Street and Canberra Ave and Newcastle Street have the potential to become a traffic bottleneck. Since these intersections are the main route for traffic wanting to access the Monaro Highway from both the south and north this would create a serious impediment to traffic flow on that important route.

The number of truck movements in the local area will rise by a significant factor also affecting commercial properties and their customers. On this basis the application should not be approved as it will alter the status-quo such that the traffic system and parking may be overwhelmed; access to commercial and retail properties will be hindered, and safety of pedestrians be they residents in the area, their visitors or members of the general public seeking to access those businesses will be reduced.

Construction traffic would temporarily increase local traffic movements over an unspecified period of time. Construction traffic would have severe localised impacts. At its peak up to 60 trucks per day could access the Proposal site during the construction phase. Once operating at full capacity the facility would be expected to admit 230 trucks or more per day for the delivery of waste all of which would pass through Wiluna and Lithgow Streets to access the site. Additional assessment is required to accommodate traffic demands from background growth when the Site is fully developed and operational and additional traffic generated by the growth in the rail freight component. The growth potential of traffic impacts

have not been not assessed and should be required of CRS in addressing the Scoping Document.

As a result of these truck movements the Traffic assessment surprisingly determined that there would be “negligible” changes in traffic performance except for Wiluna Street which would be the most impacted. The Traffic Study admits that Wiluna Street will be the worst affected by the increased number of trucks but failed to categorise or quantify the expected impacts.

Road safety in general was another potential adverse impact which was not assessed. Wiluna Street has congestion issues during peak periods currently and the addition of garbage trucks / heavy vehicles transporting waste will put even more pressure on an over congested road. Parking will be difficult for customers and reversing into oncoming traffic more dangerous.

The construction phase of the Proposal would involve extensive demolition work, clearing of the site, massive cut and fill operations involving highly contaminated soil and construction of the transfer terminal facilities; all of which would include activities with the potential to generate dust emissions. These emission are likely to be fine particulates with chemicals of concern adhered to them. Diesel exhaust emissions from operation of construction vehicles and plant would also generate particulate emissions. It is unclear from the EIS what amount of particulate matter will be engendered by the construction and operation of the facility.

A recent report by the NSW EPA “*Methodology for valuing the health impacts of changes in particle emission - final report*” February 2013 identifies Canberra Queanbeyan as the regions with the second highest PM2.5 after Sydney. Diesel emissions are recognised carcinogens as is the BTEX pollution in the soil on the site which will be disturbed by the demolition and construction. It is also recognised by the Federal Government (NPI data base) that there is no known threshold at which health effects from particulate matter do not occur. The published health effects include;

- allergic or hypersensitive reaction to toxic material adsorbed onto the particulate matter;
- irritation of mucous membranes;
- increased respiratory symptoms aggravation of asthma and premature death;
- cardio vascular effects and
- cancer.

This raises issues of public health which have not been adequately addressed in the Draft EIS. The EIS failed to estimate how long the construction phase will last as the neighbouring businesses and their customers would be the worst affected. The EIS should also have established the yearly production of Particulate matter and diesel fumes and its health costs to the community.

As a result I request that the Minister commissions a suitably qualified independent Inquiry Panel of experts to assess each aspect of the EIS for which additional scientific and technical assessment is needed.

Air impacts associated with the operational phase of the MRF also comprise potential for dust and odour generation. To mitigate these the proponent intends to install a ventilation system which is not filtered. The system would be designed to replace the air within the terminal building five times per hour. The high volume of the air to be expelled into the atmosphere

from the ventilation stack has not been assessed for its volume, composition and health impacts on the surrounding neighbourhood. It is likely to contain dust in coarse and fine fractions, diesel emissions and benzene and pathogens generated by the decaying waste. All of these are harmful to human health; some of them carcinogenic. It is likely that the people working on and around the site would be most affected.

Odour modelling has shown that, with the implementation of the ventilation stack, odour emissions from the proposal would be well below the odour emission criteria and odour impacts are not predicted at any residential areas. However, for the businesses operating in Wiluna, Ipswich or Lithgow Streets no such assurance is offered. Containers used to transport putrescible waste by rail would also be odorous. These were not modelled in the EIS and no mitigation or management measures were proposed to prevent the emission of odour from filled containers on the platform waiting to be loaded and transported by rail.

Waste on the station's floor and stockpiled recyclables will cause an increase in pests and vermin including insects. These will eventually migrate offsite onto other premises. This is unacceptable and cannot be mitigated or managed.

The EIS claims that daytime or night time noise criteria will not be exceeded at any residential location. However there is potential for exceedances at the closest commercial and industrial receivers on the south side of CRS's site. This impact is considered to be low and best practice measures would be adopted by the developer to appropriately manage construction noise impacts on surrounding businesses. For the operational period a fence will be constructed along the southern boundary. This is a desperate attempt to appear to be minimising this problem but again there is no guarantee that the businesses to the south will not be affected by the cumulative noises from the site, of locomotives, the almost constant procession of trucks breaking and idling, the shredders, grinders, dozers and compactors inside the shed and general site noise.

No vibration impacts or structural damage at either residential or commercial/ industrial buildings was assessed. Monitoring of vibration impacts on the closest receivers prior to construction should be done to determine the existing condition of buildings so that any future damage can be apportioned. Photographic records should be made and vibration monitors installed at appropriate locations. These need to be kept in permanent working order.

It was a serious omission in the EIS that no monitoring was proposed for any of the environmental impacts, for example air quality, noise, vibration and odour. This must be addressed to the satisfaction of those who will be most affected.

The business owners of Fyshwick strongly object to this development and request that the application be rejected.

Yours sincerely,

