

**From:** [REDACTED]  
**Sent:** Tuesday, 26 June 2018 4:05 PM  
**To:** EPD, Customer Services  
**Subject:** Submission Against

**Categories:** Green Category

**Submission and Objection Against** - Draft Environmental Impact Statement  
Materials Recovery Facility Fyshwick - Section 8, Blocks 9 & 11 - Capital Recycling Solutions  
Application Number 201700053

I write as a resident of NSW whose home is adjacent the ACT border and the Fyshwick commercial area in which the CRS proposal is intended to be located. In my capacity as a recycling consultant I provide advice to state and local governments in international circles and have provided expertise in a vast array of recycling programs in numerous communities around the world. As a founding member of the Zero Waste International Alliance in 2003 and an advisor to Zero Waste Europe I have helped facilitate programs in the 350 European communities which have Zero Waste as their stated strategy objective. Most of these communities rely on resource recovery as a business opportunity and employer of community benefit. Proposals of this sort from CRS would not be contemplated.

I am totally opposed to the concept of a Waste Transfer Station being established under the guise of a Materials Recovery Facility in the middle of Fyshwick. The type of materials proposed to be collected in such a facility will contain a very high proportion of organic materials and will also include toxic plastics and explosive materials - the potential of a fire is not only very real but given the past records of the companies involved, is inevitable.

In past years we have had numerous fires in 'recycling' facilities in the ACT which generated untested toxic pollutants which flowed over adjacent NSW homes. The most serious of these in recent years have been the last two at the Canberra Concrete Recyclers yard, the recent and 'highly suspicious' GRI scrap metal yard fire in Beard and the numerous fires which have occurred in the Access Metals Recycling yard in Fyshwick which can be readily checked against ACT Fire Brigade figures. Access Recycling is of course CRS - so it is clear the companies involved in the partnership for this proposal have had numerous fires in their facilities in recent years.

The NSW EPA wrote to the FOY Inquiry Panel on 29 March 2017 regarding the ill-fated FOY proposal, their complaint at that time was principally regarding concerns in regard to air quality, the prospect of poorly managed waste facilities in the ACT and the potential to jeopardise the air quality of NSW residents, which is guaranteed under NSW law. The inevitable inclusion of PTFE and PVC plastics in waste streams from both the domestic and commercial sectors in conjunction with the inevitable future fires on the site, mean that it will place the health of all Queanbeyan and adjoining NSW residents in jeopardy. In addition to all these facts, the predominant wind is from the West - anything which is burnt in the ACT inevitably results in air pollution for NSW residents.

It has been clear from the outset that the original incineration proposal put forward by this partnership, is the long-term objective for the Fyshwick site. Any other conclusion is naive in the extreme. It is also clear that an incineration proposal has the support of an individual or individuals in the staff of the ACT Government who have no personal experience of incineration, other than what they have been told in representations from lobbyists.

This pathetic and constrained attempt at a supposed 'recycling' facility using a 'dirty MRF' will recover minimal materials from domestic waste bins and commercial collections. It is a blatant attempt to utilise

billions of dollars in waste and recycling infrastructure investment in the ACT and region over many years, to the commercial advantage of one company. Given that this proposal's profitability will entirely rely on the bulked tonnages handled and sent to the laughable Woodlawn 'bioreactor', it is clearly designed to effectively inhibit all future and proposed recycling programs in the region.

ACT environment and waste management staff and the ACT public are being hoodwinked by this consortium, in the same way that the person who set up an above-ground tip off Tarlee Street, in Hume managed to bamboozle all before him, despite the fact that two similar sites of his had been fined and closed down in NSW. The fact that this absurd Fyshwick proposal, in the middle of Canberra's major commercial precinct has got to the point of public consideration and the release of an EIS demonstrates that ACT regulators are either severely under-resourced or lost in obfuscation.

In the event that this proposal is given any positive consideration by the ACT Government and its staff, I shall be asking the NSW EPA to lodge the strongest possible protest on location of such a facility adjacent the NSW border because of its potential polluting effect. I shall also ask it to consider legal action on my behalf, to ensure it does not compromise the lawful guarantee of clean air for NSW residents.