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Director-general Environment, Planning and Sustainable Development Directorate

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**SUBMISSION AGAINST DRAFT ENVIRONMENTAL IMPACT STATEMENT MATERIALS
RECOVERY FACILITY FYSHWICK SECTION 8, BLOCKS 9 & 11 CAPITAL RECYCLING SOLUTIONS
APPLICATION NUMBER 201700053**

The draft Environmental Impact Statement (EIS) presented by Capital Recycling Solutions (CRS) should be rejected by the ACT Government due to its failure to convincingly address the negative impacts of the waste facility on the local environment namely existing residents and businesses in the local area. The facility will have a detrimental effect on the local environment through noise and visual pollution from the additional heavy traffic on local roads, odour pollution from the waste facility and waste transport as well as unsightly visual impacts from the waste plant itself. The EIS fails to address the environmental impacts of the facility on the historically, culturally, social and economically important Fyshwick Fresh Food Markets, which has been established for over 50 years and is located approximately 1km from the Markets.

The description of what is planned to be the Australian Capital Territory's main municipal waste facility as a Materials Recovery Facility in the EIS is disingenuous. The plant's main purpose is the collection and disposal of municipal waste and should be assessed on this

basis with the proposed location, Fyshwick, an area zoned for commercial and light industry, not heavy industry. This is an area located adjacent to the inner suburbs of Canberra with increased development in this area including high density developments in Griffith and Kingston. Locating waste facilities in the central parts of urban areas is a necessary evil in mega cities such as Singapore, where the densely urban area stretches far from the city centre. However, the Australian Capital Territory is not a situation analogous to the location of waste facilities in densely populated parts of Europe, Asia or the US. The ACT existing waste facility is located in rural broad acre Symonston outside of major population or industry areas. Relocating the bulk of Canberra waste collection to an area close to businesses and central population areas doesn't make sense on environmental grounds where there are alternative sites on railway lines outside of central areas of the city.

Odour

The discussion of the impact of odour in the EIS is difficult to understand being highly reliant on jargon and expert language contrary to the requirement that EIS's be written in plain English. The discussion of the environmental impact of odour on the surrounding area is unreliable with too many variables and estimates, including those relating to the estimated proportions of waste types, to sufficiently establish that there will not be impacts from odours that will negatively impact on surrounding businesses and residents. As discussed by Hayes, Stevenson and Stuez in their review of the assessment of malodour (2014) there is 'no definitive procedure to evaluate odour impact on communities, as well as community response' (Appendix 1). The Assessment of the impact of odour in the EIS fails to recognise the problematic nature of odour assessment particularly on the Fyshwick Fresh Food Markets, located approximately 1km from the proposed site.

The Fyshwick Fresh Food Markets is Canberra oldest food market with 24 existing stallholders with an estimate 2 million visitors a year (based on customer tracking). The Markets employ hundreds of local residents with 24 local businesses in the Market and this number set to increase with the development of the Niche Markets. The Markets add more

than \$100 million in retail spending into the local economy with a supporting network of local growers and producers whose main retail pipeline is the Fyshwick Markets. The Markets are a significant historic and cultural icon with a long history in the region. The Fyshwick Markets are a market where pedestrian areas are all outdoor increasing the potential for negative odours from the proposed facility. With a location very close to the facility the EIS fails to establish that there will be no negative odours that will impact on the Fyshwick Markets. Negative odours have a detrimental impact on the food shopping experience even where odours are even intermittent or slight. As discussed in the literature in this area bad odours have a greater impact than good ones (Larsson, Jonsson, 2009) (Appendix 1). While bad odours are found by Schiffman, Miller, Suggs, Brevick and Graham to cause 'more tension, more depression, more anger, less vigor, more fatigue, and more confusion' (Appendix 1). The potential negative impacts of bad odour, the problem with the odour assessment component of the study as well as the general problems with reliable assessment and predictions of odour, warrant further independent study of this issue before the waste facility is approved. In addition to the odour from the plant there will be additional odour pollution from the transportation of rubbish to the site. There are consistent complaints in regard to odour in the similar rail terminal waste transfer stations in Sydney at Clyde and Banksmeadow.

Traffic

The proposed waste facility will add an estimated 230 truck movements a day moving 300,000 tonnes of rubbish a year. The EIS fails to adequately assess the impact of increased traffic on congestion particularly around the Fyshwick Markets which can be a heavily congested area particularly on the weekends and busy trading periods. Existing congestion already has a negative impact on local businesses at the Fyshwick Markets any additional even slight increase in congestion will damage businesses in the area. The EIS fails to provide an appropriate analysis and assessment of the impact of increased congestion on Canberra residents and local businesses. This assessment should include estimates of future growth in traffic with increased high density residential development in the surrounding areas of Kingston and Griffith as well as future growth of traffic from the facility itself as rubbish collection increases in response to population growth. The EIS has hardly made mention of the future suburb of East Lake planned for an additional 9,000 people and the

impact of their additional transport to reach the Monaro Highway via the most direct route which is Ipswich St. Without a proper assessment of the impact of traffic on local businesses and residents the ACT, Government can't properly assess the impact of the waste transfer station. The additional heavy traffic will have a noise pollution component which is an unavoidable by-product of heavy vehicles. In addition, there is the visual and physical pollution component from the heavy vehicle movements to and from the facility. Heavy vehicle traffic is unattractive and unappealing to residents of the local area as well as local businesses. The EIS fails to assess the impact of additional traffic on local residents and businesses, the Dairy Road Foreshore development and East Lake.

Other Negative Impacts

There are other concerns relegated to the waste facility including the potential for fire with the Access Recycling facility at 15 Lithgow Street, Fyshwick experiencing seven fires attended by ACT Fire & Rescue in the last four years. The EIS fails to thoroughly and comprehensively analyse the probability of fire and the risks to local businesses. Fires in waste facilities can burn for days.

We submit that the following needs to occur:

- An assessment by government with proper community input as to why the facility has to be located on Ipswich Street Fyshwick outside of the commercial considerations of this site already being leased by CRS and the co-location of the Access Recycling site.
- An assessment of the location of the facility at alternative sites. The construction of a railway siding to connect a facility located in a more appropriate location may add to the costs but if the real impact of the waste facility is considered in terms of its detrimental economic impact on local businesses the additional cost would be offset. With the ACT Government investing in the construction of new railway lines (the light rail) at costs estimated in the billions to benefit local residents the construction of an additional rail link to benefit businesses of the key retail and industry area that is Fyshwick and residents of the inner south is surely warranted.

- A proper assessment of the impact of odour and traffic on local businesses and residents.
- An assessment of whether such a waste transfer facility is required at all given the intent of the Waste Feasibility Study to source separate food and garden organics into the new green bins for compost

Fyshwick is an important centre for local small, medium and large businesses. Adding a waste facility to an area which is focused on retail and light industry will detrimentally affect businesses in the area at a time when the ACT Government should be doing all that it can to support businesses in the ACT region which face increasing threats from online retailers, consolidation in the retail and light industry sector as well as the increased reach of overseas retailers. Allowing the location of a waste facility in Fyshwick benefits one business only CRS while damaging many more. It is a short sighted proposal that 'solves' the problem of waste in the Canberra region by causing significant additional environmental problems in addition to the negative economic impacts of the plan on local businesses.



Appendix 1

Larsson, M. Blavarg, C. Jonsson, F. (2009). Bad Odors Stick Better Than Good Ones: Olfactory Qualities and Odor Recognition. *Experimental Psychology*. . <https://doi.org/10.1027/1618-3169.56.6.375>.

Schiffman, S. Sattely Miller, E. Suggs, M. Graham, B. (1995). The effect of environmental odors emanating from commercial swine operations on the mood of nearby residents. *Brain Research Bulletin*. 47(4), 369-375. <https://doi.org/10.1027/1618-3169.56.6.375>

Hayes, J. Stevenson, R. Stuetz, R. (2014). The Impact of Malodour on communities: A review of assessment techniques. *Science of the Total Environment*. 500-501, 396-407. <https://doi.org/10.1016/j.scitotenv.2014.09.003>