



Submission on Materials recovery facility - Fyshwick - EIS application 201700053

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The Conservation Council ACT region is the peak non-government environment organisation for the Canberra Region. We have been the community's voice for the environment in the Canberra region since 1979.

Our mission is to achieve an ecologically sustainable and zero net carbon society through advocacy, education, research and engagement with community, the private sector and with government.

We represent more than 40 member groups who in turn represent over 15,000 supporters. We harness the collective expertise and experience of our member groups and networks. We work collaboratively with Government, business and the community to achieve the highest quality environment for Canberra and its region.

The Conservation Council is active in a number of campaign areas. Our current focus includes:

- **Biodiversity Conservation** – protecting our unique ecological communities and the Bush Capital
- **Climate Change** – a regional, national and global challenge
- **Planning** – the right things in the right places
- **Transport** – connecting people and places
- **Waste** – being efficient through closed-loop systems
- **Water** – smart use of a scarce resource
- **Governance** – for a Smarter, Sustainable Canberra

1 Overview

The Conservation Council ACT Region welcomes the opportunity to comment on Materials recovery facility - Fyshwick - EIS application 201700053. The Conservation Council has existed since 1979 as an advocate for the environment in the ACT region, working with member groups to protect and enhance the local environment.

We support many of the points already made in other submissions on this EIS particularly with the inappropriate location of the facility and its deleterious impacts on Fyshwick and surrounding suburbs.

2 Inappropriate development

The draft *Draft Environment Impact Statement Materials Recovery Facility Fyshwick April 2018* (draft EIS)¹ does not provide an adequate context and justification for the project to take place.

While the draft EIS points to the ACT Waste Management Strategy 2011-2025 this document is expected to be revised to take account of changed circumstances since it was originally written.

These circumstances include that the ACT Government is proposing to introduce legislated targets that there be zero net greenhouse gas emissions by 2045 at the latest. The draft EIS does not adequately address how the proposed facility will reduce emissions to zero by 2045. This is a glaring environmental deficiency which should be addressed by more specific requirements in the EIS scoping document.

***Recommendation 1.
Future ACT EIS scoping documents should be amended to specifically address how proposals will assist achieving zero net greenhouse gas emissions by 2045***

The draft EIS suggests that it will have an outcome to prolong the life of the existing Mugga Lane cell, and that "CRS propose a local solution to waste management".

However the facility is not dealing with the actual waste issue, which is that there is too much of it, and it is not appropriate to call the transfer of ACT waste by rail to a NSW landfill "a local solution to waste management".

***Recommendation 2.
Transfer of ACT waste by rail to a NSW landfill should not be accepted as "a local solution to waste management"***

It seems from the way that the CRS proposal is constructed that in order to develop what it calls "a holistic waste recovery facility" the development will need to include a later Waste to Energy plant.

Waste to energy such as through some form of thermal treatment would be expected to produce some greenhouse gas emissions and this would not fit within the ACT Government's proposed zero net emissions targets.

¹ *Draft Environment Impact Statement Materials Recovery Facility Fyshwick April 2018* http://www.planning.act.gov.au/_data/assets/pdf_file/0006/1190895/DRAFT-EIS-201700053-01.pdf

Recommendation 3.

The proposal should not be accepted given that it will rely on a future waste-to-energy component which will not be acceptable under the ACT Government's proposed zero net emissions targets

Also, waste to energy will have other issues relating to the potential toxic fumes and other pollutants. In this case, such a facility, even if it were possible or desirable, should not be located near to any areas where environmental damage might occur. This would especially and obviously include the residents and other animals of nearby suburbs: not only Narrabundah and Kingston and near and further suburbs but also Fyshwick itself has significant population use and visitation.

Recommendation 4.

Given that the facility is proposed to have a future waste-to-energy component it should not be located near to any areas where environmental damage might occur in this case the residential suburbs of Narrabundah and Kingston and others and also Fyshwick itself

The best thing about the proposal is that it proposes repair and upgrading of rail facilities at the site and this would have possible positive effects for heavy transport options out of the ACT. However the merits of additional train transport are outweighed by the proposal that "residues can be transported by rail from the ACT to Woodlawn, and recyclables to other destinations such as Port Botany".

Recommendation 5.

The benefits of repair and upgrading of rail facilities are welcome but are outweighed by disadvantages of the proposal

The ACT should be dealing with its own waste as far as possible and there is not a strong case to transfer material to an NSW facility. It potentially leads to a situation where:

"A scheme like this fosters a lifestyle where ACT Government and residents are not dealing with their own waste, alleviating all pressure to reduce system input. Communities and businesses would no longer have an incentive to reconsider high levels of consumerism behaviour. Waste initiatives or education strategies would be rendered unnecessary, due to this 'out of sight, out of mind' situation. Costs and access would also be subject to external decision-makers such as the NSW Government."²

² Lauren de Waal, *Options for long-term waste reduction and management in the Australian Capital Territory*, https://conservationcouncil.org.au/wp-content/uploads/2014/11/Conservation_Council_ACT_Lauren_de_Waal_Research_Report.docx.pdf p15

***Recommendation 6.
The ACT should deal with its landfill waste within its borders and transport material for recycling if no local facilities are available***

***Recommendation 7.
Waste initiatives and education strategies should be increased to assist ACT waste management***

According to this report the lifespan of the Woodlawn site would be reduced from 50 years to 38 years if it took ACT waste (2015 figures).³ This figure could be reduced to 20 years if the Woodlawn facility takes additional Sydney waste at a level of 50% of the total Sydney waste-stream.⁴

***Recommendation 8.
ACT landfill waste should not be transferred to Woodlawn.***

Under these circumstances the CRS proposal would not be part of a long-term solution.

³ Ibid p16

⁴ Ibid Appendix 7.1 p28