



**CONSERVATION  
COUNCIL**  
ACT REGION

## **Submission to: Environment, Planning and Sustainable Development, ACT Government**

# **Integrated Resource Recovery Facility EIS201900001**

**August 2020**

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 1981. We work to protect our environment through advocacy, community engagement and campaigning.

We campaign to:

- cut greenhouse emissions
- protect biodiversity in our urban and natural areas
- protect and enhance our waterways
- reduce our waste and improve urban sustainability, and
- promote sustainable transport and planning for our city.

As the peak body, we advocate on behalf of and support our more than 45 member groups, which have a combined membership of over 20,000 people. We collaborate with Government, business and the community to advocate for the highest quality environment for Canberra and the ACT region.

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## Introduction

The Conservation Council ACT Region welcomes the opportunity to comment on Integrated Resource Recovery Facility – 6-14 Tennant Street, Fyshwick – EIS Application 201900001. Hi Quality ACT Pty Ltd.'s proposal for a new Integrated Resource Recovery Facility offers to recycle 600,000 tonnes of waste per annum (tpa) and process another 500,000tpa of non-waste material into concrete.

The ACT produces around one million tonnes of waste a year. An average of 73% of this waste is already recycled with the remaining average of 27%, less than 300,000 tpa, being sent to landfill.<sup>1</sup> The ACT has plateaued at around 70% recycling rates for more than a decade and has outlined a desire to reach 90% by 2025.<sup>2</sup> The greatest contributors to landfill are 'residual' wastes, which are 'likely to be landfilled in perpetuity', and organics like timber, food organics and paper/cardboard.<sup>3</sup> The ACT Government has committed to a separate collection of food organics with garden waste when waste contracts expire in 2023. When this occurs, more than 40,000 tonnes of food waste could be diverted from landfill.

As such, a primary concern that we would identify with this proposal is a lack of information about where the feedstock for the waste facility will be coming from, and the alignment of the proposal with the ACT Government's current waste strategies and overarching policy frameworks.

Concerns have been raised about another, smaller in scale, recycling facility in Fyshwick proposed by Capital Recycling Solutions (CRS), because of 'doubts over the economic viability of the plant', 'increased risk of stockpiling of rubbish', clashes with climate change strategies, breaking of ACT proximity principles and clashes with the ACT Waste Management Strategy which 'earmarked Hume as the location for materials recovery centres'.<sup>4</sup> Hi Quality's proposal raises concerns along all these lines.

There are a number of questions that the EIS prepared for the Hi Quality proposal does not adequately address:

- Is this project consistent with ACT waste and climate policy?
- What are the sources of Hi Quality's waste streams?
- How does the facility encourage a reduction in the generation of waste in alignment with the waste hierarchy principle?
- What will be the real impacts of waste transportation on emissions pollution, traffic and noise pollution?

In assessing this impact statement, we reviewed relevant ACT policy, such as the ACT Waste Management Strategy 2011-2025, ACT Waste Feasibility Study 2018, ACT Waste-to-Energy Policy 2020-2025, ACT and NSW Regional Waste Strategy 2018-2023 and Recycling Prospectus 2020, and the ACT Environment Protection Act 1997.

## ACT Waste and Climate Policy

<sup>1</sup> Waste Feasibility Study: Roadmap and Recommendations, 2018, p9

<sup>2</sup> Waste Feasibility Study: Roadmap and Recommendations, 2018, p5

<sup>3</sup> Waste Feasibility Study: Roadmap and Recommendations, 2018, p11

<sup>4</sup> Dan Jervis-Bardy, "Barr Labor Government Poised to Block Fyshwick Recycling Plant if Re-elected," *The Canberra Times*, 8 September, 2020. (<https://www.canberratimes.com.au/story/6914055/grave-concerns-labor-poised-to-block-recycling-plant-if-re-elected/#:~:text=Plans%20for%20a%20controversial%20recycling,wins%20next%20month's%20ACT%20election.&text=%22ACT%20Labor%20has%20grave%20concerns,stands%2C%22%20Mr%20Steele%20said.>)

There are a number of inconsistencies that the project has with the ACT Government's waste and climate policies that can be summarised as:

- lack of information about the origin of the waste streams and whether this violates the ACT's waste proximity principle. Violation of this principle would be inconsistent with the ACT's waste policy and legislation and would undermine the ACT's efforts toward carbon neutrality in waste management;
- the project does not promote the reduction of waste, which is the highest priority of the waste hierarchy, but actually encourages greater generation. ACT waste policy is centred around the waste hierarchy and projects that promote waste generation undermine this principle; and
- the ACT's Waste Management Strategy 2011-2025 has earmarked Hume as the location for the recycling of waste materials making propositions for development in Fyshwick at odds with ACT government policy.

## Unclear Waste Stream Sources

The quantity of waste generated in the ACT is insufficient to warrant the construction of a large-scale recycling facility such as is proposed by Hi Quality. At a maximum only 300,000 tonnes of waste enter the ACT's landfill every year, with a large portion of this waste being non-recyclable and or soon to be diverted with improvements in food waste recycling. The resulting amount is less than half of the 600,000tpa of waste that Hi Quality wishes to process.

The EIS lays out in detail the capacity of the facility to process different waste streams but fails to identify where these waste streams will be coming from. This raises considerable concern about waste being transported long distances into the ACT and the associated environmental impact of transport pollution. Such a practice would be in conflict with both the ACT proximity principle, which states that 'waste and recovered resources should be managed as close to the source of generation as possible'<sup>5</sup> and the NSW proximity principle which confines transport of waste by road to within 150km of source.<sup>6</sup> The ACT has expressed interest in regional waste management with the Canberra Region – the surrounding NSW councils and shires, which combined with the ACT has a population of 671,891 (2016) – however, the ACT is currently responsible for up to 80% of the waste generated within that region adding only 250,000tpa of waste of which 37% is already recycled in NSW facilities (2016).<sup>7</sup> Moreover, the ACT is undertaking a \$21 million upgrade of its waste management facilities in joint with the Canberra Region to improve recycling outcomes across the region.<sup>8</sup>

We are concerned there has been no direct dialogue between Hi Quality and the ACT Government on a contract for Hi Quality to process ACT waste, and nor is there a proposal from the ACT Government to outsource further recycling contracts at this stage. In addition, the ACT and the Canberra Region produce an insufficient amount of waste to meet the capacity of 600,000tpa proposed by Hi Quality in their EIS and existing strategies and projects enacted by the ACT and the Canberra Region Joint Organisation will only continue

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<sup>5</sup> Waste Management and Resource Recovery ACT, 2016

<sup>6</sup> Claire Smith and Caitlin McJannet, "NSW Waste Reform Package Takes Effect," *Clayton Utz*, 20 December 2018. (<https://www.claytonutz.com/knowledge/2018/december/nsw-waste-reform-package-takes-effect>)

<sup>7</sup> Regional Waste Strategy 2018-2023

<sup>8</sup> ACT Government and Canberra Joint Region Organisation Recycling Prospectus 2020

to raise recycling rates. This further emphasises the question as to where Hi Quality intends to find its waste streams, something the EIS fails to address.

## **Apply the Waste Hierarchy Principle**

The waste hierarchy is the foundation of the ACT's Waste Management Strategy 2011-2025. The hierarchy focuses on the minimisation of waste generation (reduce), followed by reuse, recycle, recovery and finally landfill. The construction of an expensive, large scale recycling facility significantly beyond the capacity of current quantities of recyclable material, does not encourage the reduction of waste generation in the ACT. A reduction in feedstock would be likely to undermine the economic viability of a facility such as this, resulting in it potentially becoming a dead asset. The size alone of the facility encourages and depends on a considerable increase in the production of waste in the ACT, or further afield, to meet its demands.

## **Transport Impact**

The processing of 1.1 million tpa of waste and non-waste materials in the Fyshwick site will require a significant increase in transportation into the ACT and specifically into Fyshwick. The EIS indicates that more than 800 trucks will enter and leave the site on a daily basis, with a peak of up to 80 trucks in one hour leaving and entering the site. The environmental impact from emissions produced from such a large number of trucks arriving from unidentified, but potentially distant destinations, is considerable. Furthermore, the EIS mentions that residual wastes that cannot be recycled will be landfilled at Hi Quality's Windellama site, contributing further to transport emissions. Such a large number of trucks are likely to also contribute to traffic congestion in and around Fyshwick, noting that Tennant Street in Fyshwick is already a busy street. Air pollution from emissions and dust will have negative effects on the health of the ACT community in the areas in and around Fyshwick, and noise pollution and traffic congestion may deter visitors, potentially impacting on local businesses.

## **Recommendation**

The Conservation Council has significant concerns about the merits of this proposal. In the short term, we recommend that the EIS201900001 should not be approved in its current form.