

ACTPLA

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HUME WASTE PLASTIC TO FUEL FACILITY

APPLICATION NUMBER 201600038

BLOCK 11, SECTION 21

Dear Sir / Madam,

I have strong objections to the abovementioned facility which is proposed to be built at 36 Couranga Street Hume ACT.

Some of my objections are as follows, but not limited to those listed as I do not have sufficient time or energy to fully decipher the lengthy and detailed draft EIS.

1. Lack of consultation

A letterbox drop of 1600 flyers is insufficient for the size, scale and potential deleterious environmental effects of this project. Immediately surrounding this facility are Tuggeranong residents, Jerrabomberra residents, Hume traders and future Tralee residents. All residents and workers in this area should have been contacted using flyers, media and wider advertising.

This contact should have been made in sufficient time so that all affected and interested people had sufficient time to address the issues raised during consultation and the draft EIS.

A Jerrabomberra Residents Association meeting held on 21 September was the first time JRA was consulted about this development. Given that comments on the EIS are required by 23 September, this is too late for those residents to contribute to such a document.

The proponents have talked to the executive of the Tuggeranong Community Council but have not consulted with the TCC members as a group.

Initially “no recreational groups” were recognised as using the agricultural land to the south and west of the proposed facility. Similarly “no land managers” were identified as having a vested interest in that surrounding agricultural land.

Why did these groups go unnoticed when Purdons’ advertising repeatedly drew our attention to the fact that they are experienced and knowledgeable in ACT matters.

It was only after I contacted Purdons on 1 September about the recreational group affiliated with the ACT Equestrian Association and the land managers, Territory Agistment, that Purdons saw fit to contact those groups. The contact was made by email on 22 September which is too late for consultation before comments are due in on the EIS on 23 September.

2. Poor quality consultation

I received a flyer about this proposal and attended the meeting held at Rose Cottage on 30 August. At this meeting and since that time I have become aware of how few local residents received the flyer, or did not notice the flyer in their mail boxes.

The consultation at Rose Cottage was poorly presented. The slides presented were impossible to decipher from the back half of the room because there were sight obstacles hanging from the roof. The proponents should have been much better prepared to exhibit their information.

A larger venue and a meeting that was far more widely advertised, should have been organised.

The draft EIS is a large and technical document which I found difficult to read and respond to. It should have been written in a more user friendly style so that it could be understood by average readers with little scientific background.

The meeting at Rose Cottage on 30 August left very little time to research and respond to the draft EIS by the due date, extended to today, 23 August.

Three weeks is far too short a time for affected individuals and groups to respond to such a potentially environmentally damaging proposal.

The proponents are from interstate, and obviously have very little knowledge of local conditions in the ACT. It was irritating to sit in the audience and hear the proponents confuse Mugga Lane (location of the tip and recycling centre) with Mugga Way (location of some of the most expensive residential land in the ACT) on several occasions.

It was evident that the proponents have little interest in the ACT other than establishing a highly dangerous polluting facility here for the sole purpose of making money for their shareholders.

3. Lifestyle and environmental damage

I have lived in the same house in Macarthur for well over 30 years. My husband and I chose this location because the house backs on to Wanniasa Hills Nature Reserve and Rose Cottage Horse Paddocks. We walk out our back gate into beautiful open space. We enjoy this huge area every day in all weathers. We love it. The air is fresh and clean, native flora and fauna exist close to our residence, I have used the opportunity of owning horses and agisting them in the nearby government horse paddocks. This has brought me lifelong friends who also own horses and has allowed me to engage in healthy outdoor exercise.

In 2008 the gas fired power station was proposed to be built on land adjoining my residence. The amount of angst and distress amongst my family and many others in this area as we went through various avenues of objecting to this proposal was huge. It involved years of effort, meetings, submissions, consultations etc and was extremely stressful.

In 2016 I am now presented with much the same scenario. However this facility has the potential to emit far more dangerous pollutants. My families' and my outdoor lifestyle will

be seriously impacted by the potential pollutants. Do I and my family have to repeat the stresses of the events in 2008? Why would the ACT government even consider housing such a potentially polluting facility anywhere in ACT?

The huge amount of fuel storage (1.8 million litres) above ground on this facility's site sound dangerous when one considers such things as fire, explosions, terrorism, accidents that could occur on site and around the site.

There is also the potential for pollution entering the Jerrabomberra creek as this facility is located on the headwaters of this creek. This pollution will be carried to the Jerrabomberra wetlands and onto Lake Burley Griffen.

My house is located 1.2km from the site of the proposal and I am scared of the possible consequences of pollution from this facility as well as a fire or explosion.

How deleterious will it be for my horses who spend all their time outside and are only 900 metres from this facility? Will their grass and water become contaminated by pollutants and then be dangerous for them to consume? What are the consequences for them?

4. Lack of planning

The proponents disclosed at the consultation meeting on 30 August that the ACT was chosen as a site because the planning laws of ACT allowed consideration of such proposals. Does this mean that there are more severe restrictions on such projects in other locations in Australia? Are their standards of environmental protection higher and more vigilant than those in ACT?

Why is the rubbish of other states (Queensland, NSW, Victoria) being transported into the ACT, refined and then the fuel produced is transported out of the ACT?

The concept of rubbish from other states being imported into the ACT is abhorrent to me. The ACT should be clean and green, it's the Bush Capital. We do not want the ACT becoming the dumping ground for the rubbish of other states. Why not keep Hume as light industrial only? Allow data centres and other light industries. Definitely no more dirty heavy industry.

Allow the residents of Tuggeranong, Jerrabomberra and Tralee to relax and enjoy our lives and not be stressed out of all existence worrying about such proposals and having to write lengthy submissions that are in all probability going to be ignored because the ACT government needs to sell land to make money and doesn't seem to be too concerned about which developments are welcomed here.

5. Lack of checks and balances

Where will the toxic plastic that is not able to be processed by this facility be disposed of? The proponents told us at the meeting that it would be sent back to its origin. Is this true, back to the other states? Or will it be disposed of at Mugga Lane tip because it is closer and cheaper to dispose of there?

How reliable and accurate are the proponents' methods of identifying and removing the toxic waste from their feedstock? Where will the toxic waste be stored, for how long and under what conditions? How safe is it to have lying around waiting for disposal?

How reliable are the proponents when they say this process and their refinery is safe and will have no adverse effects on the community or environment?

How will emissions from the facility be checked and reported on? From where will these measurements be taken? How confident can I be that these measurements will be accurate, measured in the correct sites, accurately reported and investigated and mitigated if too high?

6. Comparisons with Berkeley Vale

The proponents have continually referred to their facility at Berkeley Vale (BV) as being comparable to that proposed for Hume. However there are major differences between the two and it seems disingenuous to compare them.

The BV facility was built to process 200 tonnes of plastic/day, yet it only processes 50 tonnes/day. It commenced operations in June 2016 yet the amount processed still remains at ¼ of that proposed for Hume. Why have operations not been scaled up at BV?

The BV facility processes mixed fuels into separate fuels, whereas the Hume plant will be processing plastics only into fuels. Why is this?

The BV facility should be able to process plastic waste from Queensland, NSW and Victoria, why does it not?

The emissions from BV are listed as particulates, sulphur dioxide, oxides and nitrogen, carbon monoxide, volatile organic compounds. The emissions from Hume include these pollutants as well as heavy metals, dioxins and Furans. The differences in the emissions from the two sites is due to the different feedstock. Why does the Hume site need to have the worst possible emissions emitted from the facility? The proponents proudly state "we remain confident that the levels will be zero." How can they be sure? How can we find out about these toxic emissions?

The proponents also state that "our plant (at BV) operates well inside the industrial noise limits." With the plant at BV operating at ¼ of the size of that proposed for Hume, how can they be sure that the noise here from Hume in ACT will be within acceptable limits?

The plant at BV only operates 5 days per week during business hours. The Hume plant will operate 24/7. The noise from the Hume plant during the night and at weekends will surely be impacting on those living nearby and those engaging in quiet recreation outside in the area.

The opening hours of the BV plant will ensure that truck movements are confined to those hours, yet at Hume we are told that truck movements will occur 7 days/week, including Monday to Friday 6am to 10pm; and Saturday to Sunday 8am to 4.30pm. It is an

unacceptable impost on the community to have to endure such long hours of truck movements and factory operation.

The proponents state that as Hume is an industrial area that we shouldn't have to worry about noise and truck movements. Local residents and recreational users of land near the Hume facility will be affected by the 24/7 hours operation of the facility and the extended hours of truck movements.

7. Conclusion

The proponents state that they have "spent large amounts of time and money ensuring that the processing of end of life plastics into diesel and petrol will have no negative impacts on the environment and community."

Despite these assurances, I have strong reservations about this proposal. The large number of conflicting facts and inconsistencies in all the information that I have read about this proposal have raised my alarm that it could proceed.

The proponents have filed a flawed and inaccurate document (draft EIS) on which they rely as evidence of the safety and environmental soundness of this project. This is deeply concerning to the community who could be harmed by this proposal.

I urge the ACT government to reject this proposal.

23 September 2016