

Ms Meegan Fitzharris, MLA
ACT Minister for Health
GPO Box 1020 CANBERRA ACT 2601

Dear Minister,

HEALTH ISSUES - PROPOSED 'PLASTIC TO FUEL CONVERSION' FACILITY AT HUME

We write regarding concerns about the impact to the health of the ACT population from emissions, particularly dioxins and particulate matter 2.5 and smaller, from the proposed 'plastic-to-fuel conversion' facility at Hume, and ask you take further actions to address these issues.

We wrote to you in December 2016 alerting you to the 'FOY Group' proposal to construct a plastic to fuel conversion facility at Hume. In reality it is a fuel refinery as it breaks down plastic into 'gas and liquids resembling crude oil'¹ and the gas is then burned to fractionate the remaining liquids into petrol and diesel. If operating as proposed it would produce more than 205,000 litres of fuel per day (the equivalent of processing, conservatively, some 1,300 'barrels' of oil) and store upwards of 1,890,000 litres of fuel above ground on site.

We welcome Minister Gentleman's decision to convene an Inquiry Panel. We have concerns regarding the adequacy of the Terms of Reference regarding the major community health issues raised in numerous submissions, regarding the impact on Canberrans from emissions, particularly dioxins and PM_{2.5} and smaller.

At full production, the factory is expected to burn the equivalent of 30 tonnes of gas per day, amounting to the burning of nearly 11,000 tonnes per year with the concomitant production of pollutants (dioxins and PM). While the EIS makes no mention of the amount of PM_{2.5} (tonnes per year), when one takes into account that most of the gas being burned is not commercially provided LPG, but gas derived from contaminated plastic feedstock it is highly likely that the quantity of PM_{2.5} produced will vastly exceed that of a single domestic woodstove as claimed by FOY's engineer at the single, hour-long community consultation meeting.

The draft terms of reference state that there are a number of concerns '*... with wider, long term health impacts due to the unprecedented nature of the facility in Australia*' and uses the term '*untested hypotheses*' to describe the proponent's assertions as to the safety of the proposal. CPR is of the opinion these statements are valid but insufficient. Our concerns include:

- The proponent is a mining company accustomed to operating in PNG with no expertise operating a facility of this type or size.
- The company's assertions of the site's 'minimal impact' on health are based on assumptions concerning a different and significantly smaller facility in NSW that does not and never has converted plastic into fuel. (It is worth noting that the NSW EPA has thus far denied the company approval to destroy recyclable plastic and convert it into fuel at that site on safety and environmental grounds. Have you or your Department been

¹ <http://igenergy.com.au> (Integrated Green Energy website. IGE own the Berkeley Vale facility FOY is in the process of acquiring and was planning to convert into a plastics-to-fuel facility.)

advised as to whether the NSW EPA's rejection of the proposal was related to potential population health impacts?)

A recent report from the NSW EPA *Methodology for valuing the health impacts of changes in particle emissions – final report NSW Environment Protection Agency February 2013*,² identifies Canberra-Queanbeyan as the region with the second highest PM_{2.5} damage cost (\$230,000 / tonne PM_{2.5}) after Sydney. We are of the opinion that the ACT government should also consider the following:

- Does ACT Health have any baseline studies on PM_{2.5} (and PM₁) health impacts across Canberra?
- Are these available on a suburb-by-suburb basis?
- Has ACT Health completed any studies which might verify the NSW EPA figures?

We also suggest the Inquiry Panel be directed to comment on the health cost to the ACT population from this proposal, including recommendations as to who should bear the cost: the proponents and future operators or the ACT taxpayer?

FOY's EIS states that up to 52 tonnes of any one day's 200 tonne consumption could be 'allowable contamination' that is undesirable in the production of fuel and will therefore be expended into the atmosphere probably through burning the home-made LPG. Is the unknown and unpredictable nature of the contaminants of concern to the ACT Department of Health? Many of those writing submissions on the EIS are concerned, because there appears to be little if any limitation on what can actually be ingested in this process. Will ACT Health seek to be informed of the exact nature of the emissions given the close proximity of residences, pre-schools, and businesses?

We also believe the Inquiry Panel should be directed to expressly comment on the treatment of solid char waste (purportedly one tonne per day); the extent of its contamination and the health and dollar cost to the ACT of dumping the waste in ACT landfill.

Finally, the ACT government has an obligation to ensure any long-term exposure to emissions containing dioxins and PM_{2.5} and smaller blowing up the natural corridor from Hume 24/7 does not adversely impact the health of those incarcerated in the Alexander Maconochie Centre. We believe the Inquiry Panel should be directed to comment on this matter.

In addition to a large number of submissions received by ACTPLA on the desirability, viability or safety of this proposal, we draw your attention to a range of community submissions at: <http://www.noplasticstofuel.com/> where you can also find an electronic copy of this letter.

Yours faithfully,

G. Downing
Public Officer
for
W. Reid
President
Canberrans for Power Station Relocation Inc

For more information: <http://www.noplasticstofuel.com/>

² <http://www.epa.nsw.gov.au/resources/air/HealthPartEmiss.pdf>