



The ACT Equestrian Association Incorporated

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Environmental Impact Statement: Non-recyclable plastic to liquid fuel processing facility (scoping document Notifiable instrument 2016-332)

The ACT Equestrian Association (ACTEA) is a peak body representing around 20 equestrian sporting and recreational bodies in the Territory. As representatives of the members of our affiliated Government Paddock Users Group (GPUG) who keep their horses at the Hume, Rose Cottage and Macarthur/Gilmore Government Horse Holding Paddocks we would like to make the following comments.

The horse paddocks lie to the west and south of the proposed site on what is described in the EIS as 'cleared agricultural land' for the FOY plastics recycling facility proposed for Hume. We believe GPUG and therefore ACTEA, fall into the category of 'recreational groups which will be affected by the proposal' with whom FOY are obliged to consult [Scoping document page 9]

Local horse owners, as a group, are extremely concerned about the pollution and safety aspects of the facility which they feel have not been sufficiently explained. More detailed and accurate information as to its effect on grazing practices on land neighbouring the proposed plant is required. The horses graze constantly on the grass in the paddocks. People who are the owners of the horses and the managers and staff working on the maintenance of the complexes spend a lot of time at the horse paddocks. Horse owners, particularly those having horses in the Hume paddocks accessed from Tralee St / Couranga Crescent, are concerned by the additional traffic which will be generated by the facility – not only trucks bringing in feedstock and removing product, but also by the increased traffic due to facility employees and services being provided to the facility.

ACTEA's questions relate to the following:

The nature of the waste material to be processed in the plant

The source of the waste material and route for its entry to the plant

The process to be used to convert plastics to diesel fuel

The safety of the plant

ACTEA supported by funding from Sport and Recreation Services ACT

FOY plastics plans for consultation with “any recreational groups which will be affected by the proposal” (paragraph 6 of Final Scoping Document)

1. The Nature of the Waste Material to be Processed in the Plant

ACTEA understands that the purpose of the facility is to turn non-recyclable plastics into fuel. Plastics contain some very toxic elements and the quality of the feedstock will, we assume, have an impact on potential emissions.

Can FOY guarantee that there will not be discernible wind blown odour from stockpiled feedstock?

Can FOY guarantee that the feedstock will contain only shredded waste polystyrene, polyethylene and polypropylene or can other impurities affecting the integrity of the product find their way into the processing plant?

Can the feedstock be of consistent chemical content when it will be of an uncontrolled composition coming from many unknown manufacturing sources? People have concerns that contaminants will be hard to filter out of the feedstock, will become part of the conversion process and will end up in the surrounding atmosphere.

2. The Process to be Used to Convert Plastics to Diesel Fuel

Given the nature of the feedstock will the quality of the LPG gas being used to fuel the plant be the same as that extracted directly from gas fields?

FOY claim that the conversion process will be conducted in the absence of oxygen and waste will not be burned. However, the term combustion is used throughout the presentation and the EIS. To the uninitiated there appear to be disturbing inconsistencies in the presentation and the EIS. ACTEA wants to know if this is a combustion free process as claimed.

There are real concerns about the production of the highly dangerous toxins from heated PVC and PTFE and the potential for air borne particulates arising from the facility to be absorbed into the blood stream of horses and humans.

- What is the likelihood of other persistent organic pollutants finding their way into the local atmosphere? The documentation repeatedly says that the facility will be a closed system and yet refers to 'fugitive odour and emissions being captured via a hooding system'. Either there are emissions or there are not. We would like a clearer explanation of this. The EIS also refers to an 'emission plume' above the facility. Terms like this do not inspire confidence in a closed system.
- The prevailing winds in Canberra are north westerlies but southerlies are not uncommon and are often stronger. What guarantees are there that escaped particulates will not be blown over to and settle on the nearby horse paddocks?

3. The Safety Of The Plant

Can the gases and liquid fuels generated by this process be stored safely on site?

Is the process a batch or flow process? We understand that a batch process is more hazardous.

Is there a possibility of an accumulation of pollutants on site which could become a danger in the event of an accident or damage to the plant?

Horse paddock users have had recent bad experiences with industrial fires occurring in nearby industrial estates. Apart from chemical fires resistant to efforts to extinguish them there is the persistent fear that a

plant based fire or explosion might release damaging chemicals into the atmosphere which are then able to settle undetected onto pasture.

How will FOY know if this has or has not happened?

The EIS seems to be assuming that the 'cleared agricultural land' around the site will be a buffer between any disaster at the plant and urban areas. We would like to stress that this 'cleared agricultural land', is home to significant members (that is the horses) of people's families and that the paddocks are in daily use by horse owners. The EIS seems to assume that any fire on the site is either containable to the site or encroaching on the site from the surrounding environment. We do not feel that the EIS has sufficiently discussed the possibility of toxic smoke billowing over our pastures or of a fire originating on the site spreading to surrounding areas and how that might be managed by both FOY and/or the SES.

4. Consultation by FOY with recreational groups

We look forward to hearing answers to these questions in the as yet unscheduled consultation by FOY with this Association as a recreational group. It is only late on 22 September that this Association has had an invitation from Purdon Planning Pty Ltd to discuss matters relating to the FOY plant. The ACT Equestrian Association will make contact with Purdon Planning Pty Ltd next week.

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22 September 2016