

Mr Adam McLachlan  
Assessment Officer  
Impact Assessment  
ACT Environment and Planning Directorate  
GPO Box 158  
Canberra City ACT 2601

Dear Sir,

**Request for comments on draft Environmental Impact Statement — Hume Waste Plastic to Fuel Facility**

Thank you for the opportunity to comment on the draft Environmental Impact Statement (EIS) for the proposed Waste Plastic to Fuel Facility at Hume in the ACT (EIS-201600038).

The Jerrabomberra Residents Association (JRA) is one of the most active community organisations in the Queanbeyan City – Canberra region.

We were formed by volunteers from the newly-established Jerrabomberra community in the early 1990s, to help foster community spirit and develop caring relationships between local families. Over time, the JRA became increasingly involved with advocacy and lobbying for the needs of our community, at a Local, State and Federal level.

We maintain our 'community' focus to make Jerrabomberra a special place to live. We also draw on the collective experience and skills of JRA members to ensure infrastructure and resourcing concerns are addressed by all levels of government.

The JRA were only briefed by the proponent 2 days ago. This came after being alerted to this proposed facility by the Tuggeranong Community Council. As a residential community just 4 km from this site, we are extremely disappointed the ACT Government did not consider including us as an interested and affected stakeholder in the processes.

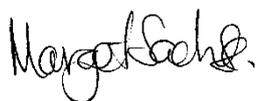
We have a number of concerns with this proposal:

1. JRA considers that the Hume location is too close to residential areas to be used for this type of plant. Just because the area is marked industrial does not mean that all industrial uses are automatically valid for the site. The JRA believes this proposed plant is too close to residential areas, fire hazards are too great, site scoping appears lax, and the modelling shoddy and inappropriate. "External experts" relied on assurances from the proponents, rather than properly reviewing and raising the possibility of risks. One example is that they say total emission from the plant in one year will be less than one day from a burning fireplace.
2. JRA considers the danger of fire from the plant and danger to the plant from external fire is too great to allow it to be in this location. In recent times, we recall the 2011 Mitchell industrial fire and the impact it had on the north Canberra community.
3. We are seriously concerned about the quality of feedstock, emissions from the plant, and the fact the proponent would self-monitor. With the prevailing winds heading in our direction and the impact of pollutants in the air heavier than non-polluted air, we would be exposed to this pollution. In winter fog, often sits for hours across the lower Jerrabomberra area. That polluted air would likely sit low in the same region causing serious health risks to our community and to the local fauna.

JRA considers that the EIS needs more work before any decisions are made, based on its content. If we had more time, this submission would go more in-depth and would likely include more issues.

We request that the EIS be considered incomplete and unsatisfactory at this time, because it has not addressed all of the issues it should address. We request that JRA be included as an affected stakeholder in the next steps, if the proponent wishes to move forward with this project.

Regards

A handwritten signature in black ink that reads "Margot Sachse". The signature is written in a cursive style with a large initial 'M' and a distinct 'S'.

Margot Sachse  
JRA President  
23 September 2016