



**PRELIMINARY RESPONSE TO
PROPOSED PLASTIC TO LIQUID FUEL PROCESSING PLANT
HUME, ACT**

Comments

The Tuggeranong Community Council (TCC) wishes to express the following concerns about the proposed plastics to liquid processing plant, by the FOY Group, Hume, ACT, based on information provided in the draft Environmental Impact Statement (EIS):

- **Location:** For highly volatile processing plant, the proposed site is far too close to residential areas. Why at Hume, so close to residential areas? Why not on the North side of Canberra? Why not well away from residential areas?
- **Volume:** The scope of the project is very large at 400 tonnes (333,000 litres) of fuel produced per day, with a storage capacity on site of 1,840,000 litres (5.5 days production).
- **Risk :** All of the hazards identified below are of concern, especially those underlined. It is noted that the draft EIS itself says the risk of fire/explosion is very high. The risks to residents nearby would appear to be excessive and the TCC would be seeking very strong assurances of minimisation before considering endorsement of the project.
 - > Spill of fuel or plastic feedstock [*It is noted that spill containment is only 21.5% of the on-site storage*]
 - > Odour from the production facility [*must be zero to be tolerable*]
 - > Hazardous Emissions emanating from the Facility [*must be zero to be tolerable*]
 - > Storm and waste water egressing from the site [*must be very low to be tolerable*]
 - > Plant based fire or explosion [*Noted as a Very High risk in the draft EIS*]
 - > Bushfire or neighbour fire [*Noted as a High risk in the draft EIS*]
 - > Noise from vehicle movement and feedstock processing [*Noted that heavy vehicle movements are seven days a week – 10 per day for waste plastics and 5 per day taking fuel out. However, it is noted also that while the proposal is for processing 200 tonnes of waste per day, the actual capacity is 500 tonnes per day.*]
 - > Dust & noise created during construction [*Undoubtedly a problem for residents over 12 or more months and will need to be minimised by watering etc.*]
- **Use of fuel produced:** It is reported that the fuel produced would be sold to the ACT Government, in the main, for use by ACTION buses. What is the assurance that this fuel source will be as clean as currently available commercial sources of diesel, in respect of pollutant components exhausted into the atmosphere in residential areas by the buses?
- **Objectives:** In respect of stated objectives of the proposal, the TCC comments as follows:
 - > Convert of 65,000 tonnes / annum of non-recyclable plastics into diesel and petrol meeting the Australian fuel standard; [*Good that it saves imports*]
 - > Remove of 65,000 tonnes of plastic from landfill; [*Good that it saves landfill*]
 - > Allow greater recycling in the ACT and NSW; [*So what?*]
 - > Employ up to 25 local full time and part time contractors; [*Good for the ACT but of insufficient benefits to Tuggeranong residents to justify location in Hume*]



- > Provide returns to FOY shareholders while establishing FOY as a market leader in green technology; [*Good for FOY but of no benefit to Tuggeranong residents*]
- > Execute all of the above with a “Do No Harm” policy. [*Good if it is in fact done*]

Summary

In summary, while the proposal has recycling merit, the TCC sees no compelling reason why the facility should be located in Hume and considers that suitable sites well away from residential areas would be available elsewhere in the ACT or nearby in NSW. In spite of assurances that may be made, the risks presented by such a large and volatile site so close to residential areas are not acceptable to the TCC.

M. R. Flint
Treasurer, Tuggeranong Community Council

Canberra, 23 September 2016