

ACTPLA (via epdcustomerservices@act.gov.au)

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**DRAFT EIS, APPLICATION NUMBER 201600038, BLOCK 11, SECTION 21, 36
COURANGA CRESCENT, HUME - FOY GROUP LIMITED - PLASTIC WASTE
FUEL CONVERSION FACILITY**

Dear Sir / Madam,

This letter is my submission in response to the draft EIS above and includes my objections and concerns to the approval of the proposed facility by the ACT government.

FOY group limited, proposes to build a plastic waste to fuel conversion facility in the suburb of Hume. The land had been rezoned to Z1 industrial. However it is my understanding that such facility in the state of NSW, which is some 540 metres away from the site, the facility would be classified as liquid fuel depot which is a sub-class of heavy industrial storage establishment.

I am a resident of Fadden, where I lived for 30 years after leaving my home town in Europe, which was highly contaminated with heavy industry. My main reason to settle in Canberra was that of providing my family with a clean environment away from heavy industrial activities and air pollution. I am therefore disappointed that a potentially contaminating facility should be built in such close proximity to residential suburbs in the ACT.

INNAPROPRIATE COMMUNITY CONSULTATION

At a Rose cottage public meeting on 30 August 2016, a small number of residents , all up about 60 people had gathered. Almost all of them only found out about the public community meeting through 'word of mouth' in last few days before the presentation. Only a few residents from Gilmore had actually received a short flyer about a proposed "Landfill diversion facility in Hume".

The slide presentation was hardly readable beyond the second row of seats. After a few minutes into the meeting representatives of the FOY and of the Purdon group were placating the group's concerns with shiny arguments and questionable environmental assurances. I and other people at the meeting were not at all convinced by the presented information.

Asked why they wanted to build such a heavy industry fuel facility in the suburb of Hume, the FOY representative volunteered that 'The ACT Planning was easier to deal with...', ...'than with other State Governments' or words to that effect. Shall I interpret from this that the proposal was going to be 'hushed through'?

Meanwhile, the whole of Canberra community was blissfully unaware of a 900 odd page Draft EIS that was just put up for public scrutiny and comments on the Land Development Agency's website on 25 August for comments to be received on 22 of September 2016.

I had found, as probably other affected members of the public had, the Draft EIS published on the ACT government website, written in an exceedingly technical language and not easy to understand by lay people like me. This was exactly the opposite of what the Environment and Planning Directorate (EPD) required the proponent to do in the Scoping Document on page 2 "the EIS must be written in plain English and avoid the use of jargon as much as possible".

'EXPERIMENTAL' FACILITY

From my understanding from the information available, the proposed facility is an 'experimental' conversion plant. Given the unforeseen potential risks, it is very difficult to understand why such an activity would be allowed in such close proximity to the adjoining businesses in Hume and importantly to the residential areas of the Tuggeranong valley. Moreover, the facility is only less than a kilometre away from the proposed residential development in Tralee, NSW.

SECURITY

Will this fuel facility potentially make the Hume area an easy terrorist target ?

How will FOY manage ongoing costs in regard to security staff and fencing off the tanks securely, which sit above ground? How will the whole site be fenced in and securely controlled? After all, these diesel and petrol tanks have a total storage capacity of 1.89 million litres? (although FOY claims the tank volume to be 1.84 million litres)

How can FOY assure me and the Canberra community that the facility is 100% secured 24/7 as required for such a facility.

CLIMATE CHANGE STRATEGY

How compliant would such a facility be within the ACT government's framework and policies regarding Climate Change Adaption, sustainable transport and waste management strategies? Is it best practice and how is a project like this viable for the future?

I do not believe this project to be compatible with the ACT government Actsmart Carbon Challenge program. The program consists of legislation, plans and strategies to stage and promote Canberra as a community, which is at the forefront on action on climate change. The ACT government expects its citizens at home, work and school to make a positive contribution in this respect. The approval of the mentioned facility appears to contradict the initiatives proclaimed by the government.

AIR POLLUTANTS

I have great fears that smog, toxic plume and groundwater contamination after an explosion on site or a raging bush fire, like we seems to experience frequently in the ACT cannot be brushed aside at all. In fact this area is rated as a high bush fire area.

How will FOY mitigate my concerns and those of the ACT community regarding these issues? It is understood the facility would be operating 24/7 from 6 am to 10 pm Monday to Friday and 8 am to 4.30 pm on the weekend.

How will the Canberra community be effected by accumulating toxins, air emissions in particular separate PM 10 & PM 2.5 as well as noise pollution of trucks & tankers entering and leaving the site day and night just to list a few.

Particularly, I am very concerned about particulate matter, both PM10 and PM2.5, which I understand need to be modelled separately and minimized as I believe these PMs play a major role on respiratory function and lung health. I would like FOY to prove that they have undertaken these studies as it is not clear to me from their draft EIS.

FOY claimed at the community meeting that the emissions output of the plant is comparable to that of a domestic wood fire. I find this statement patronising and hard to believe.

WATERWAYS

In view of the actual topography of the site, how can FOY provide assurance that any spillage and run off of the pyrolysis factory would not flow into the feeder creek which feeds the Jerrabomberra Creek and in turn feeds into the Jerrabomberra Wetlands, a world renown Nature Reserve and potentially causing destruction of the relevant flora & fauna.

How does FOY propose monitoring of groundwater and possible leakage of fuel into groundwater at appropriate timeframes and ongoing? These points have not been fully addressed in the draft EIS by the proponent and I want further clarification. The site will store up to 250 tonnes of flammable plastic waste and up to 1,89 million litres of diesel and petrol above ground on site.

I believe, there is just too much at stake & too many questions are still not fully answered in the Draft EIS by the proponent FOY Group Ltd, to mitigate any risks.

HANDLING OF FEEDSTOCK WASTE

At the Rose Cottage presentation we were informed that the ACT produces 15,000 tonnes of non-recyclable plastic waste per year and that this amount is not sufficient to make this operation viable.

Therefore FOY will need to truck some 50,000 tonnes of this plastic waste from other states including Queensland, Victoria & NSW. Interestingly the transporting of feedstock will add to carbon emissions and it would be more environmentally effective to locate the plant at the source of the waste in the respective states in my opinion.

How can FOY guarantee the quality of the plastic waste introduced in the ACT to be compliant with specific standards? How can I and the Canberra community be assured that contaminated waste plastic batches won't end up in ACT landfill ?

Will we in the ACT have to deal with toxins emanating from rejected, shredded/ granulated PVC/PTFE batches and dioxins and organ halogens emitted from shredded and possibly granulated PVC/PTFE?

Any contaminants in the waste plastic would impact on the claimed emission levels of the facility in the draft EIS and therefore also affect the quality of the fuel produced. How will that feedstock be tested? How will FOY guarantee that supply contracts for the waste plastic will continuously meet the specified criteria? Who would audit all this on a continuous basis? These questions remain unanswered in the draft EIS and I request clarification.

QUALITY OF THE PRODUCED FUEL

A FOY Group FAQ factsheet, available on the FOY website after 8 September 2016, states under point 14 the fact that the diesel fuel produced in the Hume facility “is of such high quality that it meets Euro 4 specifications”. Even a number of our ACTION buses already use diesel fuel compliant with Euro 5 & Euro 6 vehicle emission standard. This suggests that the fuel produced at the facility will be obsolete in terms of vehicle emission standards. This appears to negate any possible benefits of the conversion operation.

On these grounds would it not be a far better outcome for the Canberra community if the ACT government were to approve a solar farm facility on the site in question and on the two adjacent blocks ? In fact, there is already a solar farm on the opposite site of the Monaro highway. Endless clean energy for future generations!

IN SUM

From the information provided to this date I cannot see a justification for approving the said FOY operation in the ACT, exposing myself and my family and the Canberra community, our kids & grand kids to the potential health, environmental & safety risks associated with such a questionable facility. All this at a time when the ACT government encourages everyone to participate in the Carbon Challenge and other sustainable practices.

I anticipate answers to all of my questions above by the proponents.

EOD