



Government Paddock User Group

Chairperson: Ian Denman

Secretary: Jane Hedges

Proposal Application Number 201600038
Block 11, Section 21, 36 Couranga Crescent, Hume
Non- recyclable plastic to liquid fuel facility

The Government Paddock User Group (GPUG)

GPUG is an affiliate of the ACT Equestrian Association Inc. GPUG was formed in 2003 in response to management issues of the government horse paddocks across the ACT after the fires of that year which impacted on several of the horse paddock complexes. GPUG meets quarterly with the horse paddock managers (Territory Agistment Pty Ltd) to ensure that the government horse paddocks are maintained and improved to the best possible standard. GPUG works closely with the ACT government to try to ensure that land available for horse agistment continues to be available across the ACT.

GPUG wishes to lodge a strong objection to the development of a plastic to liquid fuel facility at 36 Couranga Crescent Hume. GPUG's objections include the following:

- the lack of consultation
- inadequate time to consider draft EIS
- increased traffic and noise,
- increased risk of a bushfire impacting the facility
- increased risk of a fire or explosion at the facility
- control of odorous emissions
- environmental impacts from air emissions.
- amount of fuel storage
- surface water contamination

1. Lack of consultation

The draft EIS states that land to the south and west of the proposed facility is cleared agricultural land. There has been no effort by Purdons or FOY to investigate who uses or manages this

agricultural land. GPUG falls into the category of “recreational groups which will be affected by the proposal” with whom FOY are obliged to consult [Scoping document page 9].

I emailed Richard Nash of Purdons on 1 September after I attended a community consultation at Rose Cottage on 30 August. I informed Mr Nash about the need to consult with ACTEA (who represent GPUG) and Territory Agistment (TA) who manage the land and fall into the category of ‘land managers’ in the Scoping document. No further contact was made by Purdons, to these two groups until today (22 September) which is too late for adequate consultation before submissions are due on the draft EIS on 23 September.

Hume horse paddocks are 400 metres away, Gilmore/Macarthur horse paddocks are 900 metres away and Rose Cottage horse paddocks are 1000 metres from this facility. The agistees of the horse paddocks, their families, horses and dogs are liable to be those most impacted by this proposal. Consequently the lack of consultation with GPUG and TA is a serious omission.

2. Inadequate time to consider draft EIS

After the public consultation on 30 August, there has been only 3 weeks to consider the ramifications of this proposal before submissions are due on 23 September. This is insufficient time for a community group to meet, discuss, research and respond to a long and technical document.

3. Increased traffic and noise

The draft EIS states that ‘noise from vehicle movement and feedstock processing’ and that “12 to 15 truck movements in a day in an Industrial Zone would not cause any undue environmental or social impacts” page 38/125 EIS. In making these statements, the proponents have failed to consider the immediate neighbours to this facility, Hume horse paddock agistees and their families, as well as the land managers (Territory Agistment).

The users of the Hume horse paddocks have to share an access road with this facility (Tralee Street). They will have to negotiate a road with large numbers of trucks entering and leaving the site 7 days a week. The type of truck they encounter will include those transporting feedstock as well as those leaving the site with fuel, which will be B doubles. The amount and type of traffic encountered by the Hume horse paddock users will make accessing the horse paddocks more dangerous and difficult, especially when towing a horse float.

Noise from the 24/7 operation of the facility will impact on the quiet enjoyment of horse paddock users and their families. The proponents continually compare noise limits to those at their Berkeley Vale plant, yet Berkeley Vale is operating presently at ¼ the size that the Hume plant will be.

4. Increased risk of a bushfire impacting the facility

Horse owners involve themselves in mitigating the risk of fire at their horse paddocks during the fire season. During the fires in 2003 many horses were killed or injured, as indeed were some horse owners who tried to rescue their horses.

The horse paddocks surrounding this facility are particularly vulnerable to fires started by cigarette butts discarded by people in vehicles along the Monaro Highway. Depending on the wind, out of control fires can spread quickly in many directions.

The draft EIS states that the risk of bushfire is high, yet with mitigation, it becomes low. Details of mitigation efforts proposed by the proponents and their effects on the surrounding horse paddock are required.

What mitigation will be carried out by the proponents?

Who will pay for these mitigation efforts?

Who will undertake these mitigation efforts?

5. Increased risk of fire or explosion at the facility

The draft EIS states that “there is a significant distance to urban areas should the facility experience a fire or other uncontrolled event.” Page 27/125 EIS. This statement is of no comfort to users of the three surrounding horse paddock complexes (Hume, Gilmore/Macarthur, Rose Cottage) who are likely to be spending considerable time attending to their horses at all times of the day and night.

The amount and type of dangerous substances stored, transported to and from and processed at this facility increase the risk of fire and explosion. The horse paddock users fear that a fire or explosion at the facility could release hazardous and toxic chemicals into the atmosphere which are then able to settle undetected onto pasture and then be consumed by horses.

There is also the fear that people at the Hume horse paddocks will be unable to escape from a fire or explosion as their only road access is blocked by the event.

What course of action will the proponents take if a fire is not contained to the site and spreads to the adjoining horse paddocks? Please give details and include response times.

6. Control of odorous emissions

The plastic feedstock “will be shredded & densified and once this has been completed, the feedstock will be transferred to a sealed silo.” Page 39/125 EIS

How likely is it that there will be odorous emissions from the feedstock before it enters the sealed silo?

What will be the nature of these odorous emissions?

The Draft EIS states that “controlling odorous emissions by way of ducted exhaust systems, which will be combusted in the cyclone combustor before being released to the atmosphere.” Page 39/125 EIS

What will be the nature of the emissions released to the atmosphere?

Where and how will they be measured?

How will these measurements be reported, and to whom?

7. Environmental impacts of air emissions

“The short and long term cumulative impact of hazardous and toxic emissions from the facility to the environment include human health effects and damage to the environment (flora and fauna). “Page 44/125 EIS

The members of GPUG are concerned that air emissions will accumulate on the grasses, in the soil and in farm dams that provide water for the horses and that they and their horses could suffer adverse health effects from these toxic chemicals.

The information provided by FOY and Purdons attempts to allay fears but does not provide evidence that the concerns of the local community are being listened to or addressed. Comments such as they “remain confident that levels will be zero,” and “very low adverse impacts on the local community,” FAQ September do not engender confidence in the proponents’ concern about the local community.

Given that there will possibly be heavy metals, dioxins and Furans in the emissions from the plant much work needs to be done by the proponents to convince those closely located to the facility that these emissions are regulated and controlled.

Will air monitoring be carried out? In what sites at the facility and where outside the facility?

Who will carry out the air monitoring? How will the results be communicated?

What are the short term and long term impacts of hazardous and toxic emissions on the environment and including human and animal health effects?

Similarly, with spillages and leakages from the facility, what effect will they have on the local community?

8. Amount of fuel storage

This facility has the potential of storing 1,890,000 litres of fuel above ground on site prior to being trucked out of the ACT. This is a huge amount of fuel especially when compared to the largest fuel station in UK which holds 1,300,000 litres underground.

This huge amount of stored fuel held above ground at Hume leads this community group to consider the consequences of human error, accident or deliberate sabotage. The separation distances of this amount of fuel from the community which is spending large amounts of time engaging in healthy outdoor exercise, is totally insufficient from everyone's point of view.

9. Surface water contamination

Horse owners who agist their horses at Rose Cottage horse paddocks, west of this facility, are well aware of the surface water, which flows during rain events, directly from the site of this facility and others at Hume West Industrial Area. This water flows under the Monaro Highway, across what used to be part of Rose Cottage horse paddocks but is now Mugga Lane Solar Farm, under Mugga Lane and enters Jerrabomberra Creek.

Thus part of the headwaters of the Jerrabomberra Creek originate around the site of this facility. The potential for the Jerrabomberra Creek to become contaminated by emissions, spills and leakages from this facility is a huge risk to the environment as the Jerrabomberra Creek flows into the Jerrabomberra wetlands and then into Lake Burley Griffin.

For this reason alone, this facility must not be given approval to go ahead.

Conclusion

The proponents of this project have reached the conclusion that "the environmental assessment concludes that the proposed construction and operation of the facility would have negligible environmental and community impact, and not adversely impact on neighbouring land uses." Page 9/125 EIS.

To reiterate, the proponents of this facility expect that it will have

"Negligible environmental.....impact"

"Negligible community impact"

"Not adversely impact on neighbouring land uses"

The Government Paddock User Group reject these claims and sincerely hope that the ACT government will refuse to allow this development to proceed.

Jane Hedges

Secretary, GPUG

23 September 2016