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CRS WASTE TRANSFER FACILITY IN FYSHWICK

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Lots of issues!

- **EIS: smell, traffic congestion, aircraft safety, fire, hazard and risk analysis**
- **stifling competition in ACT waste management**
- **operational risk for the ACT**
- **a Trojan horse?**
- **submissions by 27 June 2018 to EPDCustomerServices@act.gov.au**

smell

- **measurement of odour is imprecise**
 - metrics based on size of population affected
- **consultant's report: jargon and 'black box' models; use of USA data and parameters**
- **extreme events not addressed**
- **future volumes and mix of waste unknown**
- **even whiffs of putrid waste can be offensive**
 - residents will be **300 metres** away (East Lake)
 - Narrabundah is 650 metres away
 - Parliament House is 4.2 km away
 - Fyshwick fresh food markets?
- **who would reliably monitor and enforce ?**
- **bank-guaranteed bonds instead?**

traffic congestion

- EIS claims 230 extra vehicles per day on Ipswich and Lithgow streets over 16-hour day
- on average, one truck every 4 minutes !
- midday peak is greatest, but was not modelled
- what was car equivalent used to model trucks?
- where will displaced traffic go?
 - no origin-destination matrix?
- effect on Wiluna street businesses?
- truck numbers are ultimately irrelevant
 - what increase in travel time for all vehicles?
- more running of red lights by cars and trucks?
 - effect on crashes?

fires in waste transfer facilities

- hot processes: e.g. welding, shrink wrapping
- debris build-up in fume extraction fans
- overheated bearings in mechanical equipment
- faulty/misused electr. equip. e.g fork lift units
- **lithium ion batteries** – not discussed in draft EIS
- malicious ignition: arson, vandalism
- plastic waste, rubber create toxic fumes
- **CRS: post-mitigation risk is ‘very low’**
- **so how to explain fires in metal (only) recycling at Access Recycling in Lithgow Street, Fyshwick?**

fires in metal recycling

Date	Incident	Operator
23 Jun 2006	fire in vehicle crusher	Sims Metal
10 Jun 2014	fire involving 3 vehicles after a fire started in the vehicle crusher	Access Recycling
13 Feb 2015	minor fire in vehicle crusher extinguished by onsite staff	Access Recycling
3 Mar 2015	fire in scrap metal pile 20 by 10 metres; accidental during routine work	Access Recycling
13 Jun 2015	outdoor heating fire	Access Recycling
13 Dec 2015	fire in scrap metal that had been processed	Access Recycling
8 Sept 2016	mattresses alight caused by oxy cutting	Access Recycling
17 Jun 2017	rubbish in skip bin alight 2 by 5 metres	Access Recycling

Source: 'Date' and 'Incident' columns sourced from ACT Fire & Rescue (Mark Brown, pers. comm., 29 March 2018).

aircraft safety – bird strikes?

- Dept of Infrastructure (etc) and ICAO guidelines declare putrescible waste transfer facility within **3km** of an airport is ‘incompatible’ usage
- CRS facility is **2.5km** from flight path (main runway)
- **11 August 2017 Civil Aviation Safety Authority assessed (only) proposed incinerator stack plume**
 - bird strike hazard not assessed at all !
- Canberra Airport in the past has been concerned about birds at Jerrabomberra Wetlands
- but Canberra Airport reportedly not concerned about waste transfer facility
- Qantas, Singapore Airlines and Virgin pilots consulted?
- who will take responsibility for a plane crash?

hazard and risk analysis

- **methodology is common, but specious**
 - no cost-benefit analysis provided
- **conflates (likelihood x consequence):**
 - like adding apples and oranges
- **rigorous analysis requires separate specification of all possible likelihoods, including extremes**
- **CRS assesses 31 post-mitigation risk categories**
- **2 cases = ‘negligible’; 12 = ‘very low; 17 = ‘low’**
- **given its confidence, CRS should be happy to post a very large bank-guaranteed bond**

stifling waste sector competition?

- **a CRS waste transfer station would have competitive advantages:**
 - **\$1m from NSW for rail infrastructure**
 - **economies of scope with metal recycling**
 - **claimed contractual terms with Woodlawn landfill site (no landfill fee)**
- **result: a natural monopoly**
 - **competitors cannot viably duplicate facility**
 - **future waste management cost increases?**
- **CRS should provide undertaking to ACCC to allow competitors to use its site**

operational risk for the ACT

- **CRS business model risks include:**
 - **NSW govt imposes landfill fee on ACT waste**
 - **increased rail rates**
 - **market value of recyclables falls**
 - **legal action due to toxic fires, smell**
- **ACT should conduct due diligence, not just EIS**
- **if CRS becomes unviable, new arrangements would be costly to implement**
- **bank-guaranteed bonds should be required to cover CRS business risks**

a Trojan horse?

- **EIS: focus is on waste transfer only**
- **two different scoping applications:**
 - available to community: waste transfer only
 - given to ACT govt: will proceed with incinerator application later
- **Cardno report (EIS appendix H, p. 7): ‘there will be two separate EIS’**
- **waste transfer facility should be considered in its full context, including potential incinerator**
- **Adam Perry (*pers. comm.*, 31 May 2018) states that waste to energy plant will not be built**
- **but not clear if an ordinary (non-energy) incinerator is still a possibility for CRS, or others**

conclusions

- **even if new Waste Transfer Facility is a good idea:**
 - why Fyshwick?
 - alternative sites are available on rail line
 - just based on CRS' commercial interest
- **credible traffic analysis is required**
 - including effect on Wiluna Street businesses
 - time delay for Ipswich street vehicles
- **at a minimum, CRS should be required to provide:**
 - ACCC undertaking to allow facility use by competitors
 - bank-guaranteed bond for fire and odour breaches
- **EIS should include the incinerator proposal, or confirm in writing that it will not occur**