

To: MAREA FATSEAS,

CHAIR,

INNER SOUTH CANBERRA COMMUNITY COUNCIL

ACT GREENS RESPONSE TO INNER SOUTH CANBERRA COMMUNITY COUNCIL QUESTIONS IN RELATION TO WASTE PROPOSALS

SEPTEMBER 2020

Dear ISCCC members,

Thank you for the opportunity for the ACT Greens to respond to the issues outlined in your media release in relation to waste. The issues you raise are also ones that are of great concern to our party.

The ACT Greens have been listening to the concerns of community and businesses in relation to a number of development proposals for waste processing and recycling in Fyshwick. We believe that the community has justifiable concerns about environmental and air quality impacts, the scale of proposals and the impact of cumulative proposals on the evolution of this precinct.

Fyshwick is evolving. It has traditionally been an area that has supported bulky goods retail, light industry, low impact recycling facilities, and a broad range of cottage industries. However, there are now a number of significant residential developments that are planned in the vicinity and it is close to environmentally sensitive areas including the Jerrabomberra Wetlands. We strongly believe that the competing visions of Fyshwick need to be reconciled, in consultation with members of the community.

The ACT Greens strongly support measures to ensure we treat waste as a resource and respond creatively to diverting waste from landfill. However, we also need to consider the many policy drivers that have led to a number of interstate businesses looking to the ACT to establish large waste processing and recycling businesses that appear to include large-scale waste transfer from outside the ACT. We believe that these proposals need to be considered in the context of their impact on the ACT as well as the region more broadly. There is also a need to ensure that proposals meet holistic environmental goals including minimising impact to the

natural environment, impact on air quality and whole of life carbon emissions created by the establishment of new businesses.

In relation to the specific calls of the Inner South Community Council around these proposals, the ACT Greens offer the following comments:

1. ESTABLISH AN AIR QUALITY MONITORING STATION IN FYSHWICK

The ACT Greens strongly support this proposal, which is in line with Shane Rattenbury's February 2020 motion in the ACT Legislative Assembly which called for an expansion of the air quality monitoring system in the ACT. The location of a station in Fyshwick is logical and will provide a benchmark for the community around the impact of current industrial activity in this region.

2. CONSIDER THE CUMULATIVE IMPACT OF CURRENT AND PROPOSED WASTE FACILITIES IN FYSHWICK

The ACT Greens strongly agree that the community should fully understand the cumulative impacts of proposals to the Fyshwick region. It is important that we have high standards of air, water and pollution in the ACT. This is currently managed through the Environment Protection Act, and enforced by the Environment Protection Authority (EPA). When examining development applications and undertaking assessment processes for an EIS proposal (in impact track assessment), ACTPLA must consult with the EPA for advice and/or an Environment Significance Opinion.

However, the Greens are concerned that essentially our current planning processes mean that proposals are not assessed for their waste policy outcomes, but only on their planning impacts, with pollution taken into account. So while this means that in general projects should not be approved if they will cause significant levels of pollution, neither the EPA nor the Planning and Land Authority are responsible for assessing the overall cumulative waste impacts and outcomes.

Just as we now have a clear policy on waste to energy, we believe there should also be clear guidance from the ACT Government for the business sector on acceptable recycling proposals.

We believe that the best way for new waste technologies, processes and proposals to be assessed is instead with a waste life cycle analysis lens, which should be undertaken by an ACT Government agency with waste analysis expertise, rather than planning expertise.

We note the multiple proposals for waste facilities in Fyshwick currently: CRS waste facility, Ipswich St; Fragmentiser, Lithgow Street; and Hi-Qual waste facility, Tennant Street. Given that there are no such life cycle or waste outcome evaluations undertaken at present - particularly within ACTPLA or the EPA, the Greens propose a moratorium on any new waste technologies or proposals being approved until:

- life cycle and impact assessments are undertaken for these proposals, either through waste expertise in ACT NoWaste, or through independent analysis through an EIS inquiry panel,
- a clear waste policy and assessment regulatory framework to guide industry proposals is established,
- a review of industrial zonings is undertaken, and
- a levy on interstate waste importation is investigated.

3. EXTEND THE AMOUNT OF TIME PROVIDED FOR THE COMMUNITY TO COMMENT ON THE EXPECTED DEVELOPMENT APPLICATION BY CRS FROM THE STANDARD 15 WORKING DAYS TO 45 WORKING DAYS IN VIEW OF THE MASSIVE AMOUNT OF DOCUMENTATION THE COMMUNITY WILL NEED TO ABSORB AND RESPOND TO

The ACT Greens strongly support calls to extend planning consultation timeframes, and we note Caroline Le Couteur's recent legislative proposal to change planning laws in this direction. Unfortunately this was voted down in the Assembly by the other parties.

In addition, the ACT Greens believe that this proposal should be evaluated using waste policy expertise, not just planning expertise, as per commentary above. We believe that the absence of clear waste policy guidelines is leading to a problem where major waste proposals are only evaluated by the ACT Government via the planning system. This means ACTPLA only assesses the type of building being placed in a given location (ie. the size of the structure being built), rather than what is being done inside the box. The system then relies on EPA pollution regulations to ensure it isn't polluting excessively, which we believe does not give us best practice waste management outcomes.

4. COMMIT TO CHANGE THE ACT TERRITORY PLAN SO THAT SUCH MAJOR WASTE FACILITIES ARE PROHIBITED AS A LAND USE IN FYSHWICK

The ACT Greens agree that there is a need to consider the broader planning issues and impacts. We propose a range of mechanisms to support this, including:

- Commitment to establishing a Legislative Assembly Inquiry into the zoning related to industrial land across the ACT, to enable an assessment into how fit-for-purpose these zoning categories are in relation to the evolving nature of the city. We understand that there is also an industrial zoning underway internally within EPSDD already.
- Commitment to a master planning (or similar) process for the Fyshwick to establish a shared vision of the precinct and a clear pathway of how to realise this vision, and resolve the conflicting proposals for use of the area. This may include changes to the Territory Plan.
- Investment by ACT Government in waste and resource recovery life cycle analysis and engineering advice to provide clear advice to both Government and businesses around how proposals can achieve best practice waste management outcomes.

ADDITIONAL GENERAL COMMENTS ON WASTE:

Waste and recycling are part of a vital ongoing national conversation about how to ensure the future liveability of our planet. A key focus of this work is to reduce waste, encourage recycling, and create a circular economy whereby less waste ends up in landfill and more can be recycled and reused.

Many people would remember the CRS waste incineration proposal for Fyshwick, and the FOY plastics to fuel (or 'waste to energy') proposal for Hume a number of years ago. The ACT Government did not have a policy on waste incineration or on waste-to-energy at the time, so the ACT Greens developed [a position paper](#) that outlines the many environmental and health impacts of such incineration proposals. The Greens were very concerned about the thermal treatment of waste contributing to emissions, noting that there are far cleaner, greener and more efficient ways of managing waste than burning it. The FOY proposal was withdrawn, and CRS said that they would no longer incinerate waste as part of their proposal, given that we wouldn't support it.

We were very pleased that two years later, the Government finally developed a policy which reflected the Greens values in this space, and thus the Greens have been able to ensure incineration is now banned in the ACT Government's waste-to-energy policy. This was a real win for the ACT community.

The party makes decisions on any proposals for waste facilities based on scientific evidence and proper investigation of all environmental, health and logistics issues surrounding proposals. We are looking closely at the CRS and Hiqual waste transfer and processing proposals for Fyshwick while we develop a considered position on how to best manage such proposals holistically, consistent with our goals of a circular and zero waste economy.

The ACT Greens support the strategy to develop new industries that target waste streams that aren't being recovered. However, we want this to occur based on sound evidence and open consultation with the community.

The Greens will be announcing our detailed waste commitments for the election in the coming weeks.

In the meantime, please note that our detailed policies are online [here](#), and our election commitments [can be found here](#).

On behalf of ACT Greens, Shane Rattenbury MLA and Rebecca Vassarotti - candidates for Kurrajong, and Jo Clay - ACT Greens Campaign Spokesperson for Waste