



Mr Andrew Barr, MLA

ACT Chief Minister

GPO Box 1020 CANBERRA ACT 2601

THE PROPOSED INCINERATOR AT FYSHWICK

Dear Chief Minister,

In reference to the incinerator proposed by CRS (in partnership with Benedict Industries and ActewAGL) at Fyshwick, the Tuggeranong Community Council has major concerns over the proposed facility. We feel that this is not just a local but an ACT-wide issue. A facility of this type could undermine any credibility the ACT has built up over the years in regard to leading the nation in climate change solutions. This single facility, as proposed, could significantly adversely affect your government's greenhouse gas targets as well as negate environmental savings from both the light rail project and the ACT's solar initiatives. Furthermore, and as a matter of significance to the Minister for Health, the proponent's own pollution distribution models admit "local concentrations of NO₂ are likely to exceed the maximum allowable under NSW EPA regulations".

We also wish to register our disappointment at the apparent contradiction in government policy where on the one hand you are pushing for zero emissions yet you don't seem to acknowledge the likely negative pollution/emissions from such a development as this incinerator. Both the FOY proposal and this one are clear cases of "jurisdiction shopping" where the proponents are not allowed to conduct a business in NSW for very sound environmental reasons, but somehow believe it proper to do so in the ACT because our planning legislation is not as comprehensive. Canberra is our nation's capital – do not allow your government's legacy to be that it turned a beautiful city into a dumping ground for the states. There is no place for polluting industries of this sort in our Territory. The fact that our planning legislation was drafted to conceivably allow a facility of this type is insufficient reason to contemplate it in the light of global evidence on the environmental harm these facilities can and will cause. The industrial-scale incineration of waste undermines the "higher-orders" uses premise in place in other states and puts the ACT 20 years behind modern thinking on the subject. It also undermines the concept of the "circular economy".

In light of the ACT government's "solar highway" and further reduction of greenhouse emissions through expensive initiatives such as the light rail, we find it strange that the ACT government should be contemplating outdated, polluting technologies such as incineration, pyrolysis and gasification in your current Waste Feasibility Study. Worse still, there is potential to actually encourage such polluting industrial developments through the application of feed-in tariffs. Such a disjointed policy endangers the ACT's credibility in climate change leadership.

We urge your government to:

- Adopt, immediately and unmodified, the NSW EPA Energy from Waste policy for the ACT. This is necessary to support NSW initiatives on climate change and closes an avenue by which industry can exploit the environmental policy gap between NSW and the ACT.



- Remove from the ACT NoWaste's current Market Sounding and Waste Management Strategy references to such technologies as incineration, pyrolysis and gasification. These out-dated, polluting technologies should not be entertained in our consideration of future waste management. They undermine legitimate recycling initiatives and cleaner, healthier and more sustainable alternatives that are available if we have the vision and leadership to adopt them.
- Immediately impose a prohibition on the ACT government entertaining any business model that proposes importing waste into the ACT until your government can demonstrate best practice in waste management.
- Implement penalties, backed by effective legislation, to address the current mounting problem of waste accumulation in our local industrial estates.

Finally, Minister Rattenbury spoke at the Tuggeranong Community Council meeting on 1st August 2017, where this matter was raised and debated at some length. Minister Rattenbury's response struck me as profound. His vision for the Territory was one where we are (and I paraphrase), "... a government town - yes, but a smart technology town; not a town based on bringing in other people's rubbish." We urge you to consider Minister Rattenbury's off-the-cuff but sage advice.

In the interest of balance, I will also take this opportunity to extend to you an invitation to address a Tuggeranong Community Council meeting at your convenience to talk about the rationale behind your government's approach to waste management and the development of policies that are attracting polluting industries such as FOY and CRS into the ACT.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Glenys Patulny", is enclosed in a white rectangular box.

Glenys Patulny
President
Tuggeranong Community Council