Australian Capital Territory

Planning and Development (ACT Materials Recovery Facility at Block 12 Section 25 Hume) EIS Assessment Report 2025

Notifiable instrument NI2025–649

made under the

Planning and Development Act 2007, s 225A (EIS assessment report)

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1 Name of instrument

This instrument is the *Planning and Development (ACT Materials Recovery Facility) EIS Assessment Report 2025.*

2 Commencement

This instrument commences on the day after its notification day.

3 EIS assessment report

The territory planning authority has prepared the EIS assessment report for the ACT Materials Recovery Facility as set out in the schedule.

Note 1 A copy of the assessment report can be obtained from the territory planning authority website at: http://www.planning.act.gov.au.

Note 2 Under the Act, s 225A (5) (repealed), the EIS assessment report expires 18 months after its notification day.

George Cilliers
Territory Planning Authority
27 November 2025

ACT Government | Territory Planning Authority

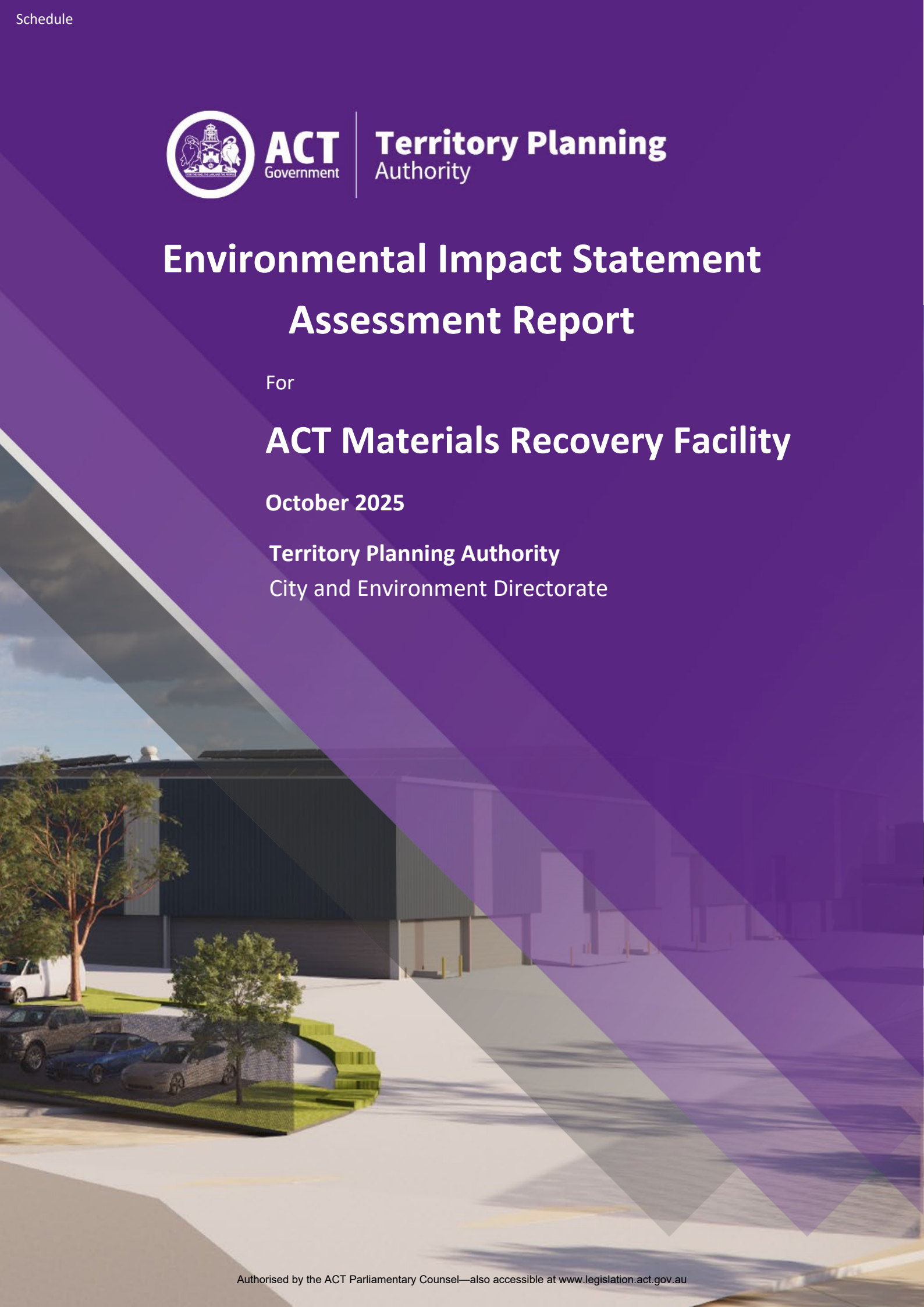
Environmental Impact Statement Assessment Report

For

ACT Materials Recovery Facility

October 2025

Territory Planning Authority
City and Environment Directorate



Environmental Impact Statement

Assessment Report

Pursuant to Section 222 of the *Planning and Development Act 2007* (**PD Act**), this report evaluates the revised environmental impact statement for the following application:

Ref no: EIS-202200011
Document no: 1-2022/45353
Project: ACT Materials Recovery Facility
Date scoping document issued: 21 July 2022
Date draft EIS lodged: 18 August 2023
Date revised EIS lodged: 13 May 2025
Proponent: Veolia Environmental Services (Australia) Pty Ltd
Applicant: Element Environment Pty Ltd
Location: Block 12 Section 25 Hume
Street address: 1 John Cory Circuit, Hume ACT 2620

As required by section 225A of PD Act, the planning and land authority (**the Authority**) has prepared this EIS Assessment Report (**the report**) for the Minister for Planning. This report confirms that the Authority is satisfied that sufficient information has been provided on each matter raised in the scoping document for this proposal.

Acknowledgement of Country

We acknowledge the Ngunnawal people as traditional custodians of the ACT and recognise any other people or families with connection to the lands of the ACT and region. We acknowledge and respect their continuing culture and the contribution they make to the life of this city and this region.

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Glossary and definitions

Term	Definition
ACT	Australian Capital Territory
The Authority	The planning and land authority
CEMP	construction environmental management plan
DA	development application
DoEE	Commonwealth Department of the Environment and Energy
EIA	Environmental impact assessment: the process of identifying, predicting, evaluating and mitigating the biophysical, social, and other relevant effects of development proposals before major decisions and commitments are made.
EIS	Environmental impact statement: a document prepared to detail the expected environmental, social and economic effects of a development, and state commitments to avoid, mitigate or satisfactorily control and manage any potential adverse impacts of the development on the environment. In the ACT, an EIS is required for proposals in the impact track as per Section 127 of the Planning and Development Act 2007.
EMP	environmental management plan
EPA	Environment Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
EPSDD	Environment, Planning and Sustainable Development Directorate
ESA	Emergency Services Agency
MNES	Matter of National Environmental Significance (as per the EPBC Act)
NCA	National Capital Authority
PD Act	Planning and Development Act 2007 (ACT)
PD Regulation	Planning and Development Regulation 2008 (ACT)
TCCS	Transport Canberra and City Services

1. Introduction

This report is to the ACT Minister for Planning on the assessment of the Environmental Impact Statement (EIS) in relation to the ACT Material Recovery Facility (the proposal).

The proposal is for a development type that meets Section 123 of the *Planning and Development Act 2007* (PD Act) as it involves an activity mentioned in Schedule 4 of the PD Act, therefore requiring an Environmental Impact Statement (EIS) to be prepared. A future development application (DA) for this project is required to include a completed EIS under the PD Act.

1.1. Project description

Through the Scoping Document and draft EIS processes, GHD was the applicant acting on behalf of NoWaste as the proponent of the Project. Following public consultation of the draft EIS, NoWaste selected Veolia as its industry partner after a competitive procurement process. Through the final revised EIS process, Element Environment Pty Ltd has become the applicant acting on behalf of Veolia as the new proponent of the proposal.

The proposal is for the construction and operation of a material recycling facility. The EIS documentation states that construction is expected to begin in 2026 with operations commencing in 2028.

The proposal will have capacity to receive and process up to 115,000 tonnes per year of comingled recyclable materials. Recyclable material will be received from municipal kerbside collection, recycling drop off centres (Mugga and Mitchell Transfer Stations), commercial recycling, as well as regional Councils. Recyclable materials being at the Facility include glass, metal, plastic, paper and cardboard.

The proposal also includes an education space to allow the community and school groups to visit and learn about how recyclable products are processed and transformed into renewed items. The proposed site layout taken from the revised EIS is shown in **Figure 1** below.

Figure 1 - Proposal site layout

1.2. Project background

The site (described in **Section 1.3** of this report) is currently developed as a material recovery facility. The existing facility, however, was extensively damaged by fire in December 2022. The main shed remains standing and is currently being used as a waste transfer station to accept, sort and store recyclable materials before being shipped to other processing facilities. The proposal seeks to redevelop the site for a new facility with technological improvements to enable greater resource recovery by both increasing the quality of recycled materials and by reducing the amount of nonrecyclable residual waste that is currently sent to landfill.

The EIS documentation includes consideration of 'doing nothing' and continuing to operate the existing facility in its current capacity, as well as expanding the existing facility and maintaining the main shed. These are not the preferred options outlined in the revised EIS, for the reasons detailed in **Section 1.4** of this report.

1.3. Project location

The EIS relates to land in Hume, Australian Capital Territory. The land is located at Block 12 Section 25 Hume (the site) and is 5.052ha in area. The land is zoned IZ1 General Industry under the Territory Plan. The project location and broader locality is shown in **Figure 2**.

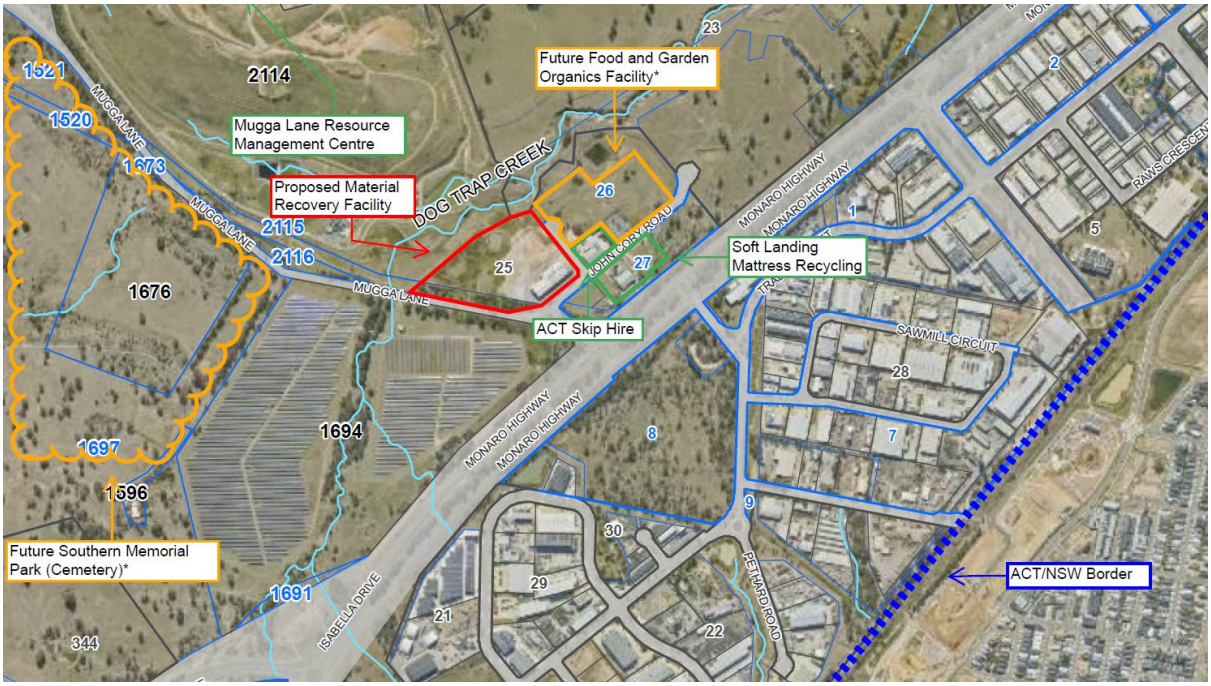

Figure 2 - Proposal site and locality

The site is part of a broader Hume Resource Recovery Estate which includes the following adjacent facilities:

- ACT Skip Hire across Recycling Road to the north-east.
- Soft Landing Mattress Recycling located east, across John Cory Road.
- Hume Industrial Estate located to the south and east across Monaro Highway.

- Mugga Lane Resource Management Centre and Landfill located approximately 200 metres to the north-west.

There are also several major developments proposed in the surrounding region, including:

- A food organics and garden organics (FOGO) facility proposed to be located on Block 5, Section 26 Hume, to the north-east of the subject site, across John Cory Road which will cater for up to 70,000 tonnes of household organic material per year.
- Monaro Highway safety improvements and intersection upgrades are proposed including the Mugga Lane, Lanyon Drive, Isabella Drive, Tralee Street and Sheppard Street intersections.
- A proposed new cemetery, the Southern Memorial Park, to be located approximately 700m to the west of the subject site.

The site is located adjacent to Dog Trap Creek to the north. The EIS also notes the site's location and proximity to residential development in NSW (approximately 1.2km to the southeast) and the ACT (approximately 1.8km to the southwest).

1.4. Alternatives to the project

The EIS documentation considers five options as viable development options in the ACT region in terms of issues such as cost to the Territory and community, minimising environmental and heritage impacts, resource recovery outcomes, an efficient and serviceable location, and safety of the facility to workers.

Option 1: Do nothing

The EIS documentation states that approximately 229 tonnes per day is being transported to interstate processing facilities which is unsustainable in the long term as it has substantial cost, environmental consequences and is dependent on the capacity of interstate facilities to be able to receive and process the material. The proponent thereby considers the do-nothing option as unacceptable.

Option 2: Alternative site

The proposed land use is defined under the Territory Plan as a 'Recycling Facility'. This land use is prohibited in all land use zones except for IZ1 General Industrial, IZ2 Mixed Use and TSZ2 Services. TSZ2 zoned sites are generally small sites located within suburban areas (for electrical substations, etc.) and not appropriate for the proposed development. IZ2 zoned sites cater for mixed use commercial and light industrial development. A Recycling Facility of the nature and scale proposed is likely to have unacceptable reverse-amenity impacts on surrounding development in this zone. IZ2 zoned land is thereby considered to be the only appropriate land for the proposal. There is a limited supply of IZ2 zoned land in the Act. The subject site, within the Hume Resource Recovery Estate, is considered the most appropriate IZ2 zoned site given the complimentary existing and proposed land uses.

Option 3: New addition to the existing MRF

A concept layout for a new building addition to the existing shed facility was prepared by the proponent. Through these investigations a number of issues with this approach were identified. These issues relate to the siting of a new building on the site, including unstable soils (with associated costs to mediate), potential impact on heritage, and potential erosion into Dog Trap Creek. A copy of this concept layout taken from the EIS documentation is provided below in **Figure 3**.

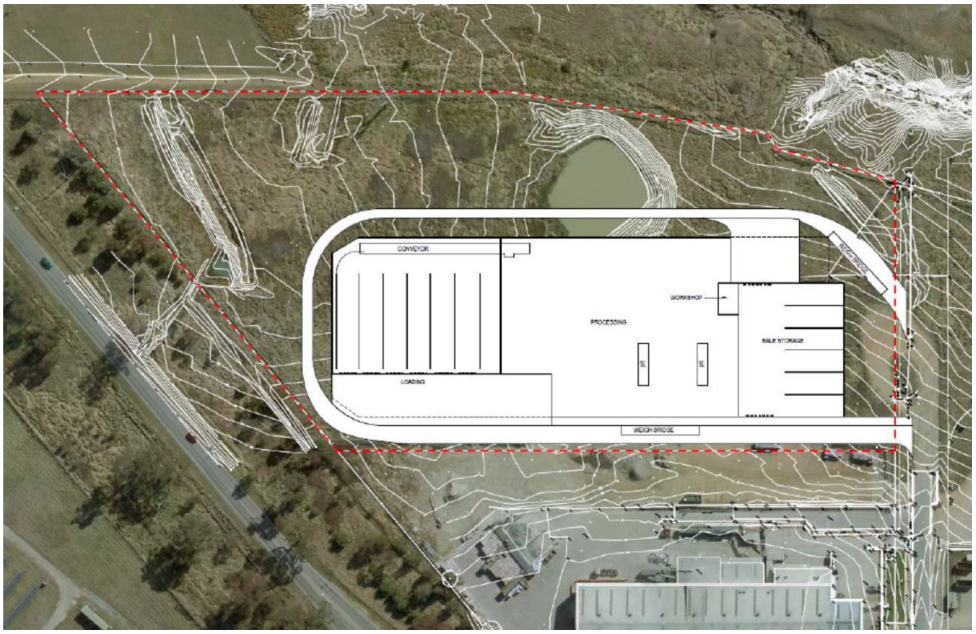

Figure 3 - Option 3 Concept Layout Plan

Option 4: Two buildings

The proponent also prepared a concept layout plan for the proposal in two separate buildings (demolishing the existing shed). Issues identified through these investigations include stabilisation and erosion impacts (as outlined in Option 3) as well as pedestrian movement, as well as safety concerns relating to pedestrian movement through the site, and the need to transport material via forklift between buildings. A copy of this concept layout taken from the EIS documentation is provided below in **Figure 4**.

Figure 4 - Option 4 Concept Layout Plan

Option 5: An integrated facility (the preferred option)

The application states that Option 5 is the result of further design development undertaken by the applicant (Veolia), based on their international experience in operating state-of-the-art

material recovery facilities. This option addresses stabilisation, erosion, heritage and safety impacts identified in the alternative options.

A summary of the options assessment prepared by the proponent is shown in **Figure 5** below.

	Do-nothing	Alternative Site	Option 3	Option 4	Option 5
Cost to Territory and community	✗	✗	✗	✓	✓
Minimise environmental and heritage impacts	✗	✗	✗	✓	✓
Resource recovery outcomes	✗	✓	✓	✓	✓
Efficient and serviceable location	✗	✗	✓	✓	✓
Safety of facility to workers	✗	✓	✓	✗	✓

Figure 5 - Analysis of options considered by the proponent

2. The environmental impact assessment process

Environmental impact assessment processes are used to identify, predict, plan for and manage the impacts of development proposals before a decision is made about the project going ahead. An environmental impact assessment process is required to be undertaken for projects in the impact track. Three options are available for environmental impact assessment – Environmental Impact Statement (EIS), EIS exemption and Environmental Significance Opinions (ESO), with the suitability of each option dependent on the type and scale of project.

An environmental impact assessment process is not an approval process. It ensures potential impacts and possible mitigation measures have been fully investigated and documented in accordance with the requirements of a scoping document.

The EIS is used as a key assessment tool for any development application lodged for the proposal. The EIS also recommends conditions to be imposed on a development application (if approved) for the proposal. Part 2.2 below outlines the EIS process.

Under section 127 of the PD Act, a development application for a development proposal in the impact track must include a completed EIS in relation to the proposal (unless the application is exempted under section 211 of the Act).

Section 123 of the PD Act states that the impact track applies to a development if:

- the relevant development table states that the impact track applies;
- the proposal is of a kind mentioned in Schedule 4 of the PD Act;
- the Minister makes a declaration under section 124;
- section 125 or section 132 applies to the proposal; or

- the Commonwealth Minister responsible for the *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act) advises the Minister in writing that the development is a controlled action under the EPBC Act, section 76.

2.1. Impact track triggers

The proposal is in the impact track as it is a development of a kind mentioned in Schedule 4 of the PD Act. This proposal triggers the Schedule 4 items listed in **Table 2.**

Item Number	Description	Project Component
Part 4.2, item 9	*proposal for a waste transfer station or recycling facility that sorts, consolidates or temporarily stores solid waste (including municipal waste) for transfer to another site for disposal, storage, reprocessing, recycling, use or reuse, if the transfer station—* *(a) is intended to handle more than 30kt of waste each year; or* *(b) will be less than 1km from the boundary of a residential block or unit in a residential or commercial zone; but* *is not a small-scale waste management facility, on or near a residential block or near a residential unit, consisting of wheelie bins, small hoppers, or other small waste management bins or enclosures for the use of people living on the residential block or in the residential unit*	The proposal is expected to have capacity to handle more than 115,000 tonnes of waste each year.

Table 1: Impact track triggers per Schedule 4 of the PD Act

2.2. EIS process

The flowchart in Figure 6 below outlines the EIS application process.

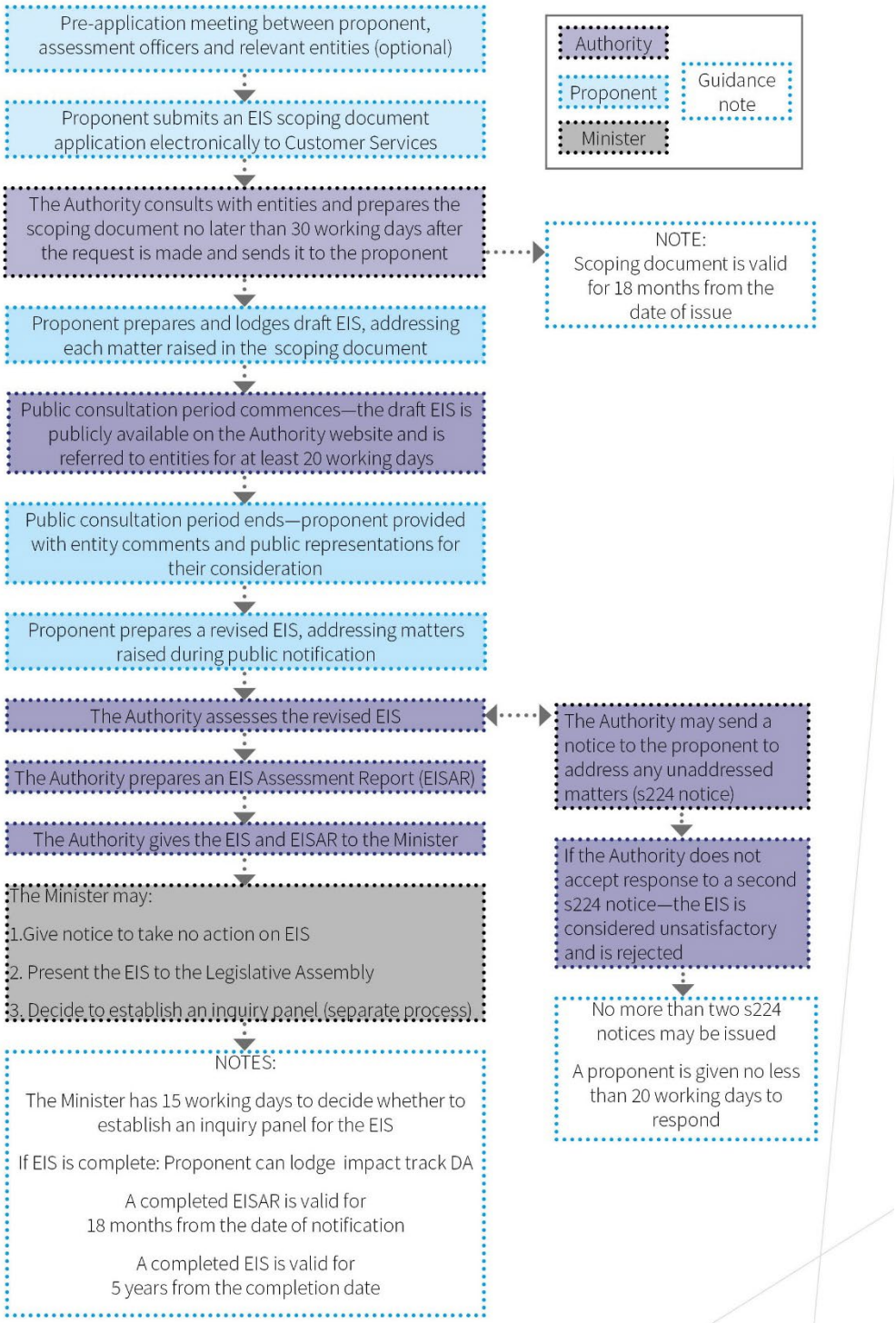

Figure 6 - The EIS process

2.3. Scoping Document

To guide the content of an EIS and therefore the investigations and research required, a scoping document is prepared. The planning and land authority (the Authority) within the City and Environment Directorate (CED and formerly Environment Planning and Sustainable Development) prepares a scoping document in response to an application made for the proposal.

On 8 June 2022, ACT NoWaste (the former proponent) submitted a request for a scoping document for an EIS pursuant to section 212(1) of the PD Act.

The Authority must consult with entities prescribed in section 51 of the *Planning and Development Regulation 2008* (**PD Regulation**) about the scoping document application. The Authority may also seek advice from the ACT community and other entities. The Authority referred the scoping document application to the entities and relevant stakeholders inviting written comments. The entities and relevant stakeholders were given 15 working days to provide comment. The consulted entities and dates of their responses are summarised in **Table 3.**

Table 2 Entity comments on scoping document application

Entity consulted	Entity response
Icon Water	14 July 2022
Conservator of Flora and Fauna & Water Policy	28 June 2022
Emergency Services Commissioner	27 June 2022
Environment Protection Authority	18 July 2022
ACT Heritage Council	30 June 2022
ACT Health	27 June 2022
Transport Canberra and City Services	22 June 2022
National Capital Authority	16 July 2022
Queanbeyan-Palerang Regional Council	21 June 2022
Climate Change and Energy	30 June 2022
Strategic Planning	5 July 2022
Canberra Airport	6 July 2022
Utilities Technical Regulation	19 July 2022

In developing the scoping document, a risk-based approach was used so that the EIS could focus on those matters that potentially result in a significant environmental impact.

On 21 July 2022 the scoping document was issued by the Authority to the proponent pursuant to section 212(2) of the PD Act (**Appendix 1**). The scoping document set out the matters to be addressed in the EIS and contained, at a minimum, the requirements required in section 50 of the PD Act and section 54 of the PD Regulation.

The scoping document was notified on the ACT Legislation Register on 21 July 2022.

Pursuant to section 214 of the PD Act, the scoping document was issued within 30 working days after the application was made.

Under section 215 of the PD Act, the scoping document is effective for 18 months from the day after the date on the scoping document. After receiving the scoping document and

pursuant to section 216(2) of the Act, the proponent is required to:

a) prepare a draft EIS that addresses each matter raised in the final scoping document for the proposal

b) give the draft EIS to the Authority for public notification

A cross-reference document was included as an Appendix to the EIS to cross reference the contents of the EIS to the contents required in the scoping document.

2.4. Draft EIS

The purpose of the draft EIS is to identify and describe the potential environmental, social and economic impacts of the proposal, including cumulative, regional, temporal and spatial considerations. The draft EIS is required to fulfil the requirements of the scoping document.

On 17 August 2023 gave the Authority a draft EIS, under section 216(2) of the PD Act.

2.4.1. Public notification of draft EIS

Pursuant to section 217 of the PD Act, the Authority publicly notified the draft EIS from 28 August 2023 to 9 October 2023 being 30 working days. This is exceeds the minimum requirement under section 218 of the PD Act, which states that the public consultation period of the draft EIS is no less than 20 working days.

During the public consultation period, a copy of the draft EIS available on the Authority's website and at the EPSDD shopfront in Dickson. This public consultation process provided interested stakeholders and the community with the opportunity to make representations on the proposal or in respect to specific environmental issues of concern.

One representation from the Conservation Council ACT Region was received during the public consultation period. A copy of the public representation received during the public consultation period is provided at **Appendix 6**. The public representation provides a summary of recommendations made as follows:

- *Install an air quality monitoring station*
- *Implement environmental containment measures proposed*
- *Implement a schedule of regular environmental monitoring (including water runoff), maintenance and compliance*
- *Plant native vegetation around the facility for multiple benefits*
- *Replace the fossil-fuel collection truck fleet with electric vehicles, at a size suitable for slow-traffic streets safe for active travel*
- *Protect Aboriginal heritage values*
- *Partner with and adequately fund local enterprises and research institutions to expand the sorting and recovery capacity to maximise reuse, high-quality materials recovery and diversion from landfill*
- *Aim for the highest-value uses of glass, plastics and all other recoverable materials, according to circular economy principles*
- *Partner with and adequately fund community organisations to enhance community education*

In response to this representation, the EIS states that all mitigation measures would be implemented as part of conditions of approval, and that environmental monitoring would be refined during detailed design and the development application stage and monitoring requirements outlined in an Environmental Authorisation.

An engagement report is provided at **Appendix S** of the EIS provides an overview of the public and entity comments received, and the proponent's response to these comments.

As required by section 220 of the PD Act, copies of all public representations were provided to the proponent and made available on the Authority's website. The representations will remain on the website until either the EIS is completed, or the representations are withdrawn.

2.4.2. Entity referral of EIS

On 29 August 2023 the draft EIS was referred to each of the entities who provided comments on the scoping document. The referral took place at the draft EIS stage so that the proponent could address entity comments in revising their EIS. Additional comments were sought on the revised EIS where the entity had requested further information from the proponent. Comments on the EIS received from entities are summarised in **Table 4**.

Table 3 - Summary of entity comments on the draft EIS

Referred entity	Entity response	Entity response date
ACT Health	Draft EIS ACT Health provided comments on the following matters: • Required updates to the Operation Management Plan; and • Further information in regard to the proposed bioretention ponds. Revised EIS ACT Health advised issues had been addressed and it had no further comment.	16 October 2023, 19 June 2025
Icon Water	Draft EIS Icon Water provided comments on the following matters: • Requirement for separate Building Approval; • Need for a hydrologic assessment once more information is available; and • Need to address water quality concerns. Revised EIS Icon Water advised they cannot accept the quantity and quality of wastewater discharge proposed from the glass component of the proposal, and the need to meet its requirements as the proposal progresses into the DA process.	16 October 2023, 25 June 2025
Jemena	Revised EIS Jemena advised it had no objection, subject to complying with the relevant development and building regulations and approvals.	29 May 2025
Conservator of Flora and Fauna	Draft EIS The Conservator provided comments on the following matters: • The need to redirect tank outflows from the proposed bioretention basins; • A requirement for a gross pollutant trap prior for flows entering the bioretention basin;	6 October 2023, 19 June 2025

Referred entity	Entity response	Entity response date
	• More detail regarding the bioretention basement performance; and • Recommended Asset Protection Zones for compliance with the Bushfire Management Standards. Revised EIS The Conservator requested further information on the following matters: • loss of connectivity for grassland fauna; • consideration of maximising stormwater retention on-site for re-use; and • a requirement at DA stage for stormwater discharge points to consider erosion risks.	
ACT Emergency Services Commissioner	Draft EIS ACT Fire and Rescue (ACTF&R) did not object to the draft EIS provided comments relating to: • Relevant standard fire safety in waste management facility requirements; and • The recommended provision of shielding around the perimeter of the facility. Revised EIS ACTF&R supported the revised EIS and provided comments related to the following: • ensuring adequacy of water infrastructure for firefighting; • ensuring adequate access and egress for firefighting vehicles and equipment; and • ensuring appropriate bushfire protection measures are advised, and an assessment of the proposal by an accredited Bushfire Consultant is included as part of a development application.	17 October 2023, 13 June 2025
Environment Protection Authority (EPA)	Draft EIS No comment. Revised EIS The EPA supported the revised EIS, subject to conditions.	13 October 2023, 19 June 2025
ACT Heritage Council	Draft EIS The Heritage Council determined the draft EIS had adequately addressed heritage impacts, subject to conditions. Revised EIS The Heritage Council determined the revised EIS had adequately addressed heritage impacts, subject to conditions.	16 October 2023, 18 June 2025
Transport Canberra and City Services (TCCS)	Draft EIS TCCS supports the proposal with no further comments. Revised EIS	13 October 2023, 7 July 2025

Referred entity	Entity response	Entity response date
	TCCS supports the proposal with no further comments.	
National Capital Authority (NCA)	Draft EIS The NCA's requirements and interests from the scoping document have been adequately addressed in the draft EIS. No further comment. Revised EIS No comment.	17 September 2023, 19 June 2025
Climate Change & Energy	Draft EIS Climate Change and Energy provided comments on the following matters: • required amendments to the Climate Change Risk Assessment; and • consideration of the solar farm at Tuggeranong Rural Block 1694 as a sensitive receptor for dust. Revised EIS Climate change and energy advised greenhouse gas emissions calculations included in the reviewed EIS are satisfactory, and Further consideration should be given to greenhouse gas mitigation and abatement measures.	19 October 2023, 7 July 2025
Strategic Planning	Draft EIS No comment. Revised EIS No comment.	16 October 2023, 7 July 2025
Canberra Airport	Draft EIS Canberra Airport did not object to the proposal, noting that no waste is proposed to be stored indoors and there will therefore be no increased risk of bird strikes associated with airport operations. Revised EIS No further comment.	7 November 2023, 3 June 2025
Utilities Technical Regulation (UTR)	Draft EIS UTR advised that the information requirements in the Scoping Document have been met in the draft EIS, and Utilities Technical Regulation are unlikely to have further interest in the bioretention pond, providing there are no changes to the height of the pond / dam.	3 November 2023

The entity comments are included in this report where they relate to each potential impact. Any matters to be considered or conditions that have been recommended by a referral entity will be included in **Section 6** of this report.

2.4.3. Request for revision of draft EIS

The Authority provided their preliminary review of the draft EIS, entity comments and public representations to the proponent. The proponent was required to revise the draft EIS, to take into consideration all matters raised in representations made during public consultation, comments from EPSDD and to demonstrate how the matters have been taken into account in the revised EIS.

2.5. Revised EIS

On 13 May 2025, the proponent submitted a revised EIS to the Authority pursuant to section 221 of the PD Act. A brief completeness check was undertaken to confirm that all appropriate sections and appendices had been included. As stated above, the revised application was circulated to selected entities to confirm their matters raised in earlier referrals has been addressed. Following this, the Authority commenced assessment of the EIS in accordance with section 222 of the Act. The Authority reviewed the revised EIS for:

- adherence to the final scoping document and legislative requirements;
- consideration and incorporation of the Authority's and entity comments provided on the draft EIS; and
- consideration and response to public representations received during notification of the draft and other consultation processes.

Matters to be considered during the assessment include possible conditions of approval for any subsequent DAs for this proposal, as identified in Section 7 of this report.

After assessing the revised EIS and discussions with referral entities, the Authority determined that there were a number of items that were deemed 'unaddressed matters'. Therefore a notice under section 224 of the PD Act was issued.

2.5.1. Section 224 notice – request for further information

On 23 July 2025 a notice pursuant to section 224 of the PD Act was issued by the Authority to the proponent **(Appendix 3).**

On 13 August 2025, the proponent provided a response to the Authority (**Appendix 4**) and the Authority deemed the response to address the unaddressed matters of the notice.

2.6. Additional public consultation

In addition to the statutory notification performed by the Authority at draft EIS stage, the following consultation activities took place:

- In May 2023, a letter was distributed to around 10,690 residents and businesses located in the suburbs of Chisholm, Fadden, Farrer, Gilmore, Gowrie, Hume, Isaacs, Jerrabomberra, Macarthur and Tralee as well as to other community members who had registered to be kept informed on the proposal. The purpose of the letter was to provide information about the proposed new MRF and FOGO facility, inform the community about the start of the EIS process for the facilities, and invite the community to provide feedback on the proposals.
- In May 2023 an email was sent to around 140 businesses and community groups to inform them of the project. The stakeholders included neighbouring services

and businesses, local community groups, and volunteer conservation, landscape management and landcare groups in the area.

- A joint MRF and FOGO project page was created on the City Services website. The project page provided information on both proposals, contained printable resources including fact sheets on both the facilities as well as fact sheets specific to odour, traffic and noise management, as well as contact details and information regarding the community drop-in sessions. The website also encouraged the community to provide feedback which would inform the draft EIS.

- Content was distributed via ACT Government channels including Facebook, Twitter and LinkedIn. The Facebook post was scheduled on 16 May 2023. It was boosted to surrounding suburbs to ensure maximum reach. It reached an audience of 1,382 with a 7.3% engagement rate, 238 reactions, 53 comments, 18 link clicks and nine shares.
- Four face-to-face consultation sessions were held in May 2023. Across the four sessions, 76 people attended and registered interest in the project. The community sessions were held across two weeks, with two sessions per week, across four different locations near the proposal sites.

Details of engagement undertaken by the proponent are contained in the Engagement Report at **Appendix S** of the revised EIS.

2.7. Giving the EIS to the Minister for Planning

Following the proponent's response to the section 224 notice, the Authority has accepted the EIS under section 222 of the PD Act. The findings and outcomes of the review of the EIS are included in this report, which is provided to the Minister for Planning with the EIS in accordance with section 225. Once the Minister has received the EIS he may:

- under section 226 – choose to take no action on the EIS; or
- under section 227 – present the EIS to the Legislative Assembly; or
- under section 228 – establish an inquiry panel to inquire about the EIS. The Minister must make this decision within 15 workings day of receiving the EIS from the Authority. The requirements for establishing an inquiry panel are detailed under Part 8.3 of the PD Act.

Under section 209 of the PD Act, an EIS is completed if the Minister:

a. gives the Authority a notice of no action under section 226;
b. has not decided to establish an inquiry panel to inquire about the EIS;
c. has established an inquiry panel for the EIS and:
    i) the Panel has reported the results of the inquiry; or
    ii) the time for reporting under section 230 has ended.

The Authority's recommendation to the Minister can be found in **Section 7** of this report.

2.8. Lodging a development application

Once the EIS has been completed the proponent can lodge a development application. Any subsequent development application related to the EIS must include the completed EIS. The EIS expires five years after the day it is completed.

2.9. Documentation referenced in this report

The documentation referenced in the Authority's assessment report is summarised as follows:

- Revised EIS and supporting documentation;
- Entity comments and public representations draft EIS;
- Correspondence or additional information received from proponent; and
- Expert/consultant advice on the project.

3. Assessment of impacts

This section provides a high-level summary of issues identified in the scoping document that had to be assessed in the EIS. The proponent's detailed assessment is contained with the EIS.

3.1. Planning and land status

3.1.1. Impacts

In relation to planning and land status, the Scoping Document identifies the proposal as having a risk of sterilising surrounding land uses.

3.1.2. *Key findings*

The EIS notes the following in relation to planning and land status:

- the site is zoned IZ1 General Industry where a 'recycling facility' is a permissible land use;
- the site is within the Hume Resource Recovery Estate, adjacent and proximate to other existing and proposed waste facilities including ACT Skip Hire across Recycling Road, Soft Landing Mattress Recycling, and the Mugga Lane Resource Management Centre and Landfill; and
- the site is within the industrial locality of Hume and approximately 1.2km from any residential development.

No issues have been raised by Strategic Planning (City and Environment Directorate).

In addition, the site is subject to a Development Control Plan (DCP) under the National Capital Plan. The EIS addresses the requirements of the DCP, and the NCA have not raised any issues in relation to the proposal. A detailed assessment of the proposal against the DCP will be undertaken as part of the future development application.

3.1.3. Mitigation and avoidance

The EIS states that no mitigation measures are considered to be required given the low risk of the proposal.

3.1.4. Scoping document requirements

The table below details the risks associated with planning and land status as defined in the EIS.

Table 5: Scoping document requirements (planning and land use)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Sterilisation of surrounding land uses	N/A	Remote	Minimal	Negligible

3.2. Traffic and transport

3.2.1. Impacts

In relation to traffic and transport, the Scoping Document identifies the risk of traffic impacts from construction and operation of the facility.

3.2.2. Key findings

A Traffic and Transport Impact Assessment (TTIA) was undertaken to assess the potential traffic impacts during the construction and operation of the proposal. The TTIA considers the construction and operation of the FOGO occurring at the same time as the proposal. A summary of the findings of the TTIA are as follow:

- Traffic analysis shows that during construction at the PM peak times, the level of service at the Mugga Lane / Monaro Highway south-bound intersection which will significantly worsen resulting in longer queuing times. The level of service at all other surrounding intersections will remain unchanged during construction.

- Traffic modelling shows there will be no change on the level of service on any of the surrounding intersections as part of the operation of the proposal.

The full TTIA is provided at **Appendix F** of the EIS. TCCS did not raise any concerns in relation to the TTIA.

Improvements in existing traffic conditions are expected to result from the Monaro Highway Upgrade works which are currently under construction and scheduled to be completed in 2026.

The EIS notes that parking for vehicles (including construction vehicles) will be provided on site during both construction and operations of the proposal. Construction and operation of the proposal is also not expected to impact public or active transport routes given there are no major stops or facilities located near the proposal site access. It further notes that emergency vehicle access would be maintained throughout construction and operation of the proposal.

3.2.3. Mitigation and avoidance

Table 6 summarises the avoidance and mitigation measures associated with traffic and transport as proposed in the EIS. A complete table of mitigation measures is available at **Table 22.1** within the Revised EIS.

Table 6: Avoidance and mitigation measures (traffic and transport)

Proposed mitigation measure	Stage of implementation
Development of a construction traffic management plan (CTMP).	Prior to construction and construction
Construction management would be controlled by the site supervisor to ensure the efficient delivery and to minimise trips.	Construction
All vehicles would comply with road traffic rules.	Construction and operation
All parking would be contained within the proposal site premises.	Construction and Operation
All staff and subcontractors engaged on-site would be required to undergo site induction.	Construction
Separation of internal haulage routes for heavy vehicle movements.	Construction
Separate entrances and exits provided for vehicles and pedestrians.	Construction
Maintained access for emergency vehicles during construction works.	Construction
Truck drivers would be directed to follow the predetermined haulage routes	Construction and operation
Any oversized or overweight load would be transported in accordance with the requirements of the relevant road authority.	Construction and operation

3.2.4. Scoping document requirements

The table below details the risks associated with traffic and transport as defined in the EIS.

Table 4: Scoping document requirements (traffic and transport)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Increased heavy vehicle traffic with potential for congestion and lane closures or traffic control systems.	Medium	Unlikely	Minor	Very low
Changes in existing traffic access such as increased heavy vehicle traffic associated with receiving and distributing resources.	Medium	Unlikely	Minimal	Negligible

3.3. Utilities

3.3.1. Impacts

In relation to traffic and transport, the Scoping Document identifies the risks of impacts on existing utilities and infrastructure and impacts from required upgrades to existing utilities and infrastructure.

3.3.2. Key findings

The proponent has undertaken a Before-You-Dig-Australia (BYDA) search which identified the utilities on and surrounding the site, which includes gas, electricity, water supply, sewer, and telecommunications infrastructure. A suitably qualified services locator also conducted a site walkover on 3 July 2023. **Section 3.7** of this report sets out the relevant details in relation to stormwater collection and treatment as well as wastewater.

The EIS states that the removal or relocation of utilities, need for discharge of liquid trade waste and stormwater treatment will be subject to detailed design. Notably, the approved demolition DA (202342289) for the existing facility included a plan for decommissioning of services. The approval dated 24 April 2024 included conditions to be implemented as part of the demolition process.

In its comments on the draft EIS, Utilities Technical Regulation advised that the information requirements in the Scoping Document had been met. In its comments on the revised EIS, Icon Water advised they cannot accept the quantity and quality of wastewater discharge proposed from the glass component of the proposal, and the need to meet its requirements as the proposal progresses into the DA process.

The revised EIS notes that the removal or relocation of utilities, need for discharge of liquid trade waste and stormwater treatment will be subject to detailed design.

3.3.3. Mitigation and avoidance

Table 8 summarises the avoidance and mitigation measures associated with utilities as proposed in the EIS. A complete table of mitigation measures is available at **Table 22.1** within the Revised EIS.

Table 8: Avoidance and mitigation measures (utilities)

Proposed mitigation measure	Stage of implementation
Conduct another BYDA to again verify the locations of the utilities.	Detailed design and prior to construction
Construction contractor to confirm the locations of utilities in consultation with the relevant providers.	Detailed design and prior to construction
Include water management and erosion and sediment controls in the CEMP to avoid contamination resulting from utility works.	Prior to construction
During the detailed design process necessary clearance distances as per AS standard, Icon Water and Evoenergy standards would be determined and	Detailed design

Proposed mitigation measure	Stage of implementation
provided to utility and service providers as necessary.	
Site supervision by the utility and service providers would be included as required during construction.	Construction
Evoenergy and Icon Water would be consulted during the detailed design phase in order to ensure the current utilities have capacity to service the proposal.	Detailed design

3.3.4. Scoping document requirements

The table below details the risks associated with utilities as defined in the EIS.

Table 9: Scoping document requirements (utilities)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Impact to the current utility services and infrastructure on site during construction	Low	Unlikely	Minor	Very low
Impacts on existing utilities and infrastructure.	N/A	Unlikely	Minor	Very low
Impacts from required upgrades to existing utilities and infrastructure.	N/A	Unlikely	Minor	Very low

3.4. Materials and waste

3.4.1. Impacts

In relation to materials and waste, the Scoping Document identifies the following risks in relation to the proposal:

- Impacts from excess stockpiling of recyclable and non-recyclable materials and waste.
- Increased waste to landfill during construction and operation.
- Impacts from the spread of waste.
- Impacts from hazardous waste and/or chemicals stored/received at the facility.

3.4.2. Key findings

A waste management assessment has been included in the EIS to quantify the waste generated by the proposal during construction and operation and address the potential environmental impacts associated with waste handling, storage and disposal. A summary of the findings of the assessment are as follows:

- DA 202342289 for demolition of the existing MRF building was approved on 24 April 2024. This DA included a Waste Management Plan covering the re-use, recycling or disposal of materials currently on the site; and

- It is estimated approximately 250m3 of construction waste will be generated during construction. Timber, concrete, bricks, plasterboard, sand/soil, and metal waste will all be recycled or reused on the site. General solid waste, batteries, and liquid waste will be recycled where possible with the remainder to be disposed of.

The EIS notes that the area for placement and transport of construction waste would be determined by the construction contractor prior to construction.

3.4.3. Mitigation and avoidance

Table 10 summarises the avoidance and mitigation measures associated with materials and waste as proposed in the EIS.

Table 10 Avoidance and mitigation measures (materials and waste)

Proposed mitigation measure	Stage of implementation
Detailed design to include measures to minimise quantities of waste requiring off-site disposal.	Detailed design
A demolition and construction waste management plan be prepared and implemented as part of the CEMP for the proposal. The plan would adopt the waste hierarchy principles contained in the Waste Management and Resource Recovery Act 2016 and detail processes, responsibilities and measures to manage waste and minimise the potential impacts.	Prior to construction
All demolition and construction waste would be classified and recycled or disposed of in accordance with the ACT 'Environmental Standards: Assessment and Classification of Liquid and Non-Liquid Wastes 2021' (EPSDD, 2021) and other relevant legislative and policy requirements.	Construction phase
A detailed Operational Waste Management Plan would be developed and implemented to incorporate the requirements of relevant guidance documents and waste management hierarchy principles contained in the Waste Management and Resource Recovery Act 2016	Prior to operation
A contingency plan would be developed prior to operation which includes	Prior to operation

Proposed mitigation measure	Stage of implementation
management measures and procedures that manage contingencies.	

3.4.4. Scoping document requirements

The table below details the risks associated with materials and waste as defined in the EIS.

Table 11: Scoping document requirements (materials and waste)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Waste generated during construction	High	Almost certain	Minimal	Medium
Waste and isolated contaminants generated during operation	High	Almost certain	Minimal	Medium

3.5. Landscape and visual impact

3.5.1. Impacts

In relation to landscape and visual impact, the Scoping Document identifies a risk of visual impacts from the facility and its operation.

3.5.2. Key findings

A Landscape and Visual Impact Assessment (LVIA) was undertaken for the proposal to assess potential for visual impacts on the proposal site and surroundings during construction and operation.

A summary of the LVIA outcomes is as follows:

- the susceptibility to change is *low*, as the industrial estate has *low* landscape value;
- the proposed magnitude of change is *low*, as the proposal is not inconsistent with the existing landscape character; and
- visual impacts at selected viewpoint locations were assessed to be *moderate-low* to negligible due to their *low* sensitivity and views being commonly screened or filtered by surrounding built form, topography and/or vegetation.

A copy of the LVIA is at **Appendix G** of the revised EIS.

In addition, the EIS notes that the proposed building heights, setbacks, access, façade materials and colours will comply with the requirements of the DCP. The NCA confirmed its requirements and interests from the scoping document had been adequately addressed in the draft EIS and provided no further comments on the revised EIS.

3.5.3. Mitigation and avoidance

Table 12 summarises the avoidance and mitigation measures associated with landscape and visual impacts as proposed in the EIS. A complete table of mitigation measures is available at **Table 22.1** within the Revised EIS.

Table 12 Avoidance and mitigation measures (landscape and visual impacts)

Proposed mitigation measure	Stage of implementation
Detailed design to include measures to minimise quantities of waste requiring off-site disposal.	Detailed design
A demolition and construction waste management plan be prepared and implemented as part of the CEMP for the proposal. The plan would adopt the waste hierarchy principles contained in the Waste Management and Resource Recovery Act 2016 and detail processes, responsibilities and measures to manage waste and minimise the potential impacts.	Prior to construction

3.5.4. Scoping document requirements

The table below details the risks associated with landscape and visual impacts as defined in the EIS.

Table 13: Scoping document requirements (landscape and visual impact)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Visual impacts during construction including disposable materials, heavy machinery and artificial lighting.	Medium	Unlikely	Minor	Very low
Storage and stockpiling of recyclable and non-recyclable waste at the facility	Medium	Unlikely	Minor	Very low
Transport of material to the site may result in spread of litter	Low	Unlikely	Minor	Very low
Consider visual impact to the Monaro Highway and consistency with Development Control Plan 171/09/0001	N/A	Possible	Minimal	Very low
Lighting impacts in relation to pilot distraction Pilot lighting distraction	N/A	Remote	Major	Low

3.6. Biodiversity and nature conservation

3.6.1. Impacts

In relation to biodiversity and nature conservation, the Scoping Document identifies the following risks:

- Impacts on flora and fauna.
- Impacts on protected matters due to facilitation of weed, pest, and pathogen spread.

The EIS identifies the direct impacts as being:

- Vegetation removal - approximately 3 hectares of previously developed land will be impacted, with less than 1 hectare of degraded grassland to be cleared. No listed threatened ecological communities will be affected.
- Fauna habitat and fragmentation - only exotic grassland will be removed; no woodland or high-value habitat will be disturbed. The dead tree and dam will be retained, minimizing fragmentation.

- Threatened and migratory species - no threatened species are expected to be impacted. The dam may provide temporary refuge for wetland birds but is not critical habitat.
- Disturbance, injury, and mortality - construction may temporarily disturb fauna, but impacts are expected to be short-term and minor.

The EIS further identifies several indirect impacts, including:

- Runoff, sedimentation, and contamination - construction near the dam and ephemeral waterbodies poses a risk of increased erosion and sedimentation. Safeguards include erosion and sediment control plans.
- Weed, pathogen, and disease spread - high cover of exotic species and declared weeds. Construction activities may exacerbate spread; strict weed and pest management protocols will be implemented.
- Edge effects - minimal new edge effects expected due to the already disturbed nature of the site.

3.6.2. Key findings

A Biodiversity Assessment was undertaken for the proposal and is included at **Appendix L** of the revised EIS. The assessment determined the following:

- the proposal site is a highly modified grassland within the South-eastern Highlands bioregion, with a long history of agricultural and industrial disturbance;
- ecological surveys identified 38 flora species (15 native and 23 exotic) with no threatened ecological communities or listed threatened flora present;
- the vegetation is dominated by exotic grasses and forbs, and the only tree on site, a stag Eucalyptus, provides minimal habitat value;
- fauna surveys found no threatened species, with only common species such as the Eastern Grey Kangaroo, two reptiles, and the Common Eastern froglet observed;
- the man-made dam and ephemeral boggy areas offer low-quality habitat for aquatic and wetland species, and targeted surveys for the Striped Legless Lizard (SLL) confirmed its absence, with the degraded grassland unsuitable for this and other threatened reptiles; and
- the site's ecological value is further limited by its isolation from higher quality habitats and the dominance of exotic species, including several declared weeds.

3.6.3. Section 224 notice

Based on comments from the Conservator of Flora and Fauna, further information was requested on the following items within **Appendix 3** – Section 224 notice relating to biodiversity and nature conservation:

- further details of whether the proposal will impact the existing connectivity for the area and whether the site will contribute to the future connectivity of the area; and
- greater analysis of this impact is required, along with more details on how the facility could improve connectivity for the future.

After considering the proponent's updated section 224 submission and revised EIS, the Conservator of Flora and Fauna confirmed its concerns have been addressed.

3.6.4. Mitigation and avoidance

Table 14 summarises the avoidance measures associated with impacts as proposed in the EIS. Details of the mitigation measures included in the below-mentioned management plans are provided in **Table 12.2** of the EIS. These management plans are recommended to be included as conditions for development approval, as set out in **Section 6** of this report.

Table 14 Avoidance and mitigation measures (biodiversity and nature conservation)

Proposed mitigation measures	Stage of implementation
A flora and fauna management plan	Pre-construction, construction
A weed and pest management plan	Pre-construction, construction
A soil and water management plan	Pre-construction, construction, operation
Erosion and sediment control	Pre-construction, construction
The weed and pest management plan	Pre-construction, construction

3.6.5. Scoping document requirements

The table below details the risks associated with impacts as defined in the EIS.

Table 15 Scoping document requirements (biodiversity and nature conservation)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Impact to listed TECs	Low	Remote	Moderate	**Very Low**
Removal of threatened flora/fauna	Low–Medium	Remote–Unlikely	Moderate	**Very Low–Low**
Impacts to SLL	**NA**	**Remote**	**Moderate**	**Very Low**

3.7. Climate change and greenhouse gas emissions

3.7.1. Impacts

In relation to climate change, the Scoping Document identifies the following risks:

- increased greenhouse gas emissions; and
- impacts on facility operations from increase in frequency of extreme climatic events.

3.7.2. Key Findings

The proponent has undertaken a greenhouse gas assessment in which the proposal is calculated to generate approximately 711 t CO2-e emissions for the construction phase and 1,187 t CO2-e emissions for the operational phase. Comments from the Climate Change Division on the revised EIS confirm the integrity of the assessment.

A Climate Change Risk Assessment (CCRA) was undertaken to evaluate the vulnerability of the proposed infrastructure to climate change risks, using both historical data and future climate projections. The CCRA for the proposal is presented in **Appendix N** of the EIS.

The Climate Change Risk Assessment was conducted in accordance with relevant Australian Standards, using a risk-based approach. The assessment considered short-term (2030) and mid-term (2050) scenarios under the high emissions pathway (RCP 8.5). The CCRA identified four primary climate hazards: extreme heat, extreme rainfall, storms, and bushfires.

3.7.3. Section 224 Notice

Based on comments from the Climate Change Division, further information was requested within Appendix 3 – Section 224 notice relating to mitigation and abatement measures including consideration of adhering to the ACT low carbon concrete policy, looking at alternate options for diesel use which could include electric options wherever possible, and seeking an independent sustainability rating or equivalent.

These comments were addressed in the updated revised EIS, and the Division confirmed that its concerns had been satisfactorily resolved.

3.7.4. Mitigation and Avoidance

Table 16 summarises the avoidance and mitigation measures associated with climate change and greenhouse gas emissions as proposed in the EIS.

Table 16 Avoidance and mitigation measures (climate change and greenhouse gas emissions)

Potential Impact	Proposed mitigation measure	Stage of implementation
Increase in extreme heat days resulting in 'stop work' days during operations.	WHS management plan and procedures would be regularly updated to adjust to conditions.	Operation
Extreme rainfall leading to flooding of the site	While the floor level of the building is well above the 1% flood level, additional protection structures (e.g. bunding etc.) would be considered during detailed design.	Detailed design and operation
Severe wind/storm event has higher wind loading than designed, causing stress to site structures resulting in damage, reduced design life or safety hazard.	Ongoing monitoring would be undertaken of site components and maintenance if deficiencies are identified. The Facility shall be designed in accordance with Australian Standards or equivalent for wind loading and earthquake loading.	Operation
Construction Emissions	Opportunities to reduce construction emissions will be investigated and considered during design and construction planning.	Construction
Feedstock contamination sent to landfill	Educational campaigns and awareness.	Operation
Diesel Use	Investigate ways to lower demand of diesel use and substitution with less emission intense fuels.	Construction and operation
	Service and maintain all machinery, as far as reasonably practical, in accordance with original equipment manufacturer recommendations for maintenance.	Operation
	Target equipment maintenance to ensure, as far as reasonably practical, equipment	Operation

Potential Impact	Proposed mitigation measure	Stage of implementation
	remains fit for purpose over its whole life cycle.	
Technology	Undertake periodic reviews of technologies and abatement measures to reduce GHG emissions from the proposal	Operation
Operation Emissions	Investigate additional opportunities to reduce operation emissions inc. solar, energy efficiency, etc.	Operation

3.7.5. Scoping Document Requirements

The table below details the risks associated with impacts as defined in the EIS.

Table 17 Scoping document requirements (climate change and greenhouse gas emissions)

Potential Impact	Risk Assessment – Inherent Risk Ratings			
	Current Climate	2030 (RCP 8.5)	2050 (RCP 8.5)	Residual risk
Drought affects near surface ground movement, potentially causing differential settlement and expansion/contraction of soils, resulting in movement of infrastructure.	Moderate	Moderate	Moderate	Low
Extreme heat effects concrete temperature management for early age crack risk and for concrete curing resulting in reduce reliability and design life of concrete foundations.	Moderate	Moderate	Moderate	Moderate
Increase in extreme heat days resulting in 'stop work' days, and greater delays to the construction program than accounted for.	Low	Low	Moderate	Low
Increase in extreme heat days resulting in 'stop work' days during operations.	Moderate	Moderate	Moderate	Moderate
Extreme rainfall leading to flooding of the site and facilities leading to impact on open processing recyclables and contamination of flood water leaving the site (water quality compliance issues)	Moderate	Moderate	Moderate	Low

Potential Impact	Risk Assessment – Inherent Risk Ratings			
	Current Climate	2030 (RCP 8.5)	2050 (RCP 8.5)	Residual risk
Extreme rainfall leading to flooding of the site and facilities leading to damage of facility components.	Moderate	Moderate	Moderate	Low
Increased frequency, severity, and duration of significant storm events including hail cause damage to the sites exposed components such as roofs and uncovered equipment.	Moderate	Moderate	Moderate	Moderate
Severe wind/ storm event has higher wind loading than designed, causing stress to site structures resulting in damage, reduced design life or safety hazard.	Low	Low	Moderate	Low
Extreme heat generated by bushfires (greater than 300 degrees Celsius) comes in direct contact with site components causing damage.	Moderate	Moderate	Moderate	Moderate
Construction activity may contribute to air pollution with gases (such as carbon monoxide, hydrocarbon etc) emissions	Medium	Likely	Minimal	Low
Increased processing and vehicle movements may contribute to air pollution with gas and odour emissions	Medium	Likely	Minimal	Low
Contribution to increased GHG emission	NA	Almost certain	Minimal	Medium

3.8. Air Quality and Odour

3.8.1. Impacts

The Scoping Document identifies the proposal as having a risk of air quality impacts, including cumulative impacts.

3.8.2. Key Findings

An Air Quality Impact Assessment was undertaken, including a review of ambient data, complaint records, and risk-based assessments of dust and odour emissions during construction and operation. A copy of the assessment is at **Appendix M** of the EIS.

Construction dust risks were assessed using IAQM guidance, and operational risks were evaluated using Australian Standards. The assessment found that all construction activities (earthworks, construction, track-out) posed a low risk to dust soiling, human health, and ecological receptors. Operational activities such as material receival, sorting, glass crushing, and wastewater reuse were assessed for odour and dust emissions, with most risks rated as acceptable after mitigation.

3.8.3. Mitigation and Avoidance

Table 18 summarises the avoidance and mitigation measures associated with air quality and odour as proposed in the EIS.

Table 18 Avoidance and mitigation measures (air quality and odour)

Impact	Proposed mitigation measure	Stage of implementation
Elevated dust levels	A dust control protocol would be prepared that forms part of the CEMP to detail management measures, a method for recording dust complaints and monitoring requirements.	Construction
	If the works are creating levels of dust which may significantly impact on residential amenity, the works would be modified or stopped until the dust hazard is reduced to an acceptable level.	Construction and Operation
	A dust complaints management procedure would be developed as part of the broader complaints management procedures to ensure that any complaints regarding dust are received by appropriate personnel and that potential issues can be investigated, and site practices adjusted accordingly.	Operation
	A dust collector system for the glass crusher would be implemented.	Operation
	If required, a dust collector system would be implemented in other areas which regularly emit large amounts of dust.	Operation
	Regular sweeping and housekeeping practices would be undertaken to maintain dust levels within the building.	Operation
Elevated levels of airborne pollutants	Plant and equipment would be maintained in good condition to minimise ignition risk, spills and air emissions that may cause nuisance.	Construction
Release of odour to surrounding communities	An odour complaints management procedure would be developed as part of the broader complaints management procedures to ensure that any complaints regarding odour are received by appropriate personnel and that potential issues can be investigated, and site practices adjusted accordingly.	Operation
	If the works are emitting odour concentrations which may significantly impact the nearby receptors, the works would be modified or stopped until the odour hazard is reduced to an acceptable level.	Operation

Impact	Proposed mitigation measure	Stage of implementation
	An internal sealed site drainage system would be provided which leads to storage tanks or interceptors that can collect rainwater and any spillage.	Operation
	Provision would be made for the segregation of odorous baled materials, and the recycling of those materials back through the MRF in the event they need further separation.	Operation
Odour and dust emissions	Household sorting practices would be promoted.	Operation
	Post-sort inspection of materials would be undertaken, and any potentially odorous materials would be isolated. Pick-ups and transport to landfill are frequent throughout the day thereby reducing the time any potential odorous materials are on site. Note also that the MRF doesn't generate highly odorous waste	Operation
	The name and contact details of person(s) accountable for air quality and dust issues would be displayed on the proposal boundary. This may be the environment manager/engineer or the site manager. The head or regional office contact information would be displayed.	Operation
	Regular inspections would be carried out to monitor compliance with the air quality management strategy. Once operational, sampling of the proposal operations would be conducted to confirm assumptions made throughout the air quality assessment.	Operation
	An air monitoring program would be established to ensure workplace exposure limits are maintained. Sampling would be undertaken in each building biannually by a suitable professional in accordance with guidance from Safe Work Australia and relevant Australian Standards.	Operation
	Sorted materials would be covered during transport.	Operation
	Ventilation equipment and dust or odour control units (if required) must be operational and regularly maintained. Should any unit become faulty, production on those affected lines would be halted immediately and not resumed until emission control systems are fully operational.	Operation

3.8.4. Scoping document requirements

The table below details the risks associated with impacts as defined in the EIS.

Table 19 Scoping document requirements (air quality and odour)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	Likelihood (after mitigation)	Consequence (after mitigation)	Residual risk
Construction activity may contribute to air pollution with dust and gas (such as carbon monoxide, hydrocarbon etc) emissions.	Medium	Unlikely	Minor	Very Low
Increased processing and vehicle movements may contribute to air pollution with gas and odour emissions.	Medium	Unlikely	Minor	Very Low

3.9. Water Quality and Hydrology

3.9.1. Impacts

In relation to water quality and hydrology, the Scoping Document identifies the following risks:

- Contamination of groundwater.
- Impacts on stormwater and surrounding waterways, such as Dog Trap creek.

The site slopes from south-east to north-west, with Dog Trap Creek adjacent to the western boundary, ultimately flowing into Lake Burley Griffin. The assessment considers surface and groundwater features, wastewater volumes, stormwater systems, erosion risks, and compliance with ACT Water Sensitive Urban Design standards.

Construction activities may generate sediment-laden runoff, managed through sediment basins, diversion drains, and monitoring. Operationally, flood modelling confirms immunity from the 1% AEP flood level. Stormwater will be treated via rainwater tanks, GPTs, and OSD systems. The facility's water demand is estimated at 82.9 ML/year, with recycled leachate and rainwater reuse reducing potable water use. Wastewater will be managed through sewer connection, on-site treatment, and future infrastructure for glass washing. Erosion risks are minimal, with an SEI ratio of 1.63 and energy dissipation structures included to protect Dog Trap Creek.

3.9.2. Key Findings

An initial Water Impact Assessment (WIA) was undertaken for the concept development proposal identified in the draft EIS publicly exhibited in September 2023. A further Water Impact Assessment was undertaken to consider changes made in the revised site layout and

operations proposed by Veolia. A copy of the revised assessments is available at **Appendix K** of the EIS.

Hydrological investigations included flood and water quality modelling, confirming the pad elevation (RL 616.25) is well above the 1% AEP flood level. MUSIC modelling shows the proposed stormwater treatment train meets ACT standards, achieving pollutant reductions of 70% (TSS), 69% (TP), 54.7% (TN), and 92% (gross pollutants). A 600 m^3 OSD basin ensures controlled discharge over six hours.

The SEI ratio of 1.63 indicates low erosion risk downstream. Wastewater management includes sewer connection, on-site leachate treatment, and futureproofing for glass washing. The facility is designed to handle up to 500 kL/day of wastewater, with 280 kL/day discharged and 150 kL/day recycled, supporting sustainable operations and environmental compliance.

3.9.3. Section 224 Notice

The Conservator of Flora and Fauna and other ACT Government entities provided feedback during the EIS process. Key concerns included maximizing stormwater retention for reuse and ensuring no erosion occurs downstream of the discharge point. In response, the revised design includes 450 kL of detention capacity and 408 kL of retention capacity, with water detained for up to 6 hours and discharged gradually. The discharge point connects to a 525 mm stormwater main, eliminating overland flow and erosion risks.

The Ecoceptor stormwater quality device was added downstream of detention tanks to capture pollutants. These changes addressed the concerns raised in the Section 224 notice and were incorporated into the revised Water Impact Assessment.

3.9.4. Mitigation and Avoidance

Table 20 summarises the avoidance and mitigation measures associated with water quality and hydrology as proposed in the EIS.

Table 20 Avoidance and mitigation measures (water quality and hydrology)

Potential Impact	Proposed mitigation measure	Stage of implementation
Water quality impacts to downstream waterways and associated aquatic ecosystems with regards to suspended solids	A Water Management Plan (WMP) would be developed that details with mitigation measures relating to installation and management of sediment basins and diversion drains, water quality monitoring and remedial actions, and more.	Construction
Water quality impacts to downstream waterways associated with the operation of the proposal	An Operational Water Management Plan (OWMP) would be developed and implemented. Some key features of proposed activities that would be specified and maintained include controlled material handling and indoor storage, emergency spill response procedures, and maintenance of wastewater systems and containment infrastructure.	Prior to construction.

3.9.5. Scoping Document Requirements

The table below details the risks associated with impacts as defined in the EIS.

Table 21 Scoping document requirements (water quality and hydrology)

Risks identified	Original risk rating	Residual likelihood	Residual consequence	Residual risk rating
Contaminated wastewater and stormwater may impact on surrounding land and water catchments.	Medium	Unlikely	Moderate	Low
Changes to water management infrastructure (dams, ponds) may impact hydrological regimes of surface water and groundwater in regard to volume and temporal discharge.	Low	Unlikely	Minor	Very Low
Potential impacts of wastewater and contaminant spills on local groundwater and surface water.	NA	Unlikely	Moderate	Low
Potential for impacts associated with wastewater generation and any other on-site activity, on water quality, aquatic ecosystem and erosion within Dog Trap Creek	NA	Unlikely	Moderate	Low
Potential for flooding to occur and damage the MRF.	NA	Remote	Moderate	Very Low

3.10. Socio-economic and Health

3.10.1. Impacts

In relation to socio-economic and health considerations, the Scoping Document identifies the risk of impacts from operation harbouring vermin and pest animals.

3.10.2. Key findings

A desktop review was undertaken to identify the potential social, economic and health impacts associated with construction and operation of the proposal, and identified the primary risk, as outlined in the Scoping Document, to be biosecurity, pests and vermin. In response, the EIS notes the following:

- risks during construction will be managed through the development and implementation of a construction biosecurity management plan as part of the CEMP legislation; and
- risks during construction will be managed through an operational biosecurity management plan.

The EIS notes that these plans will be prepared in accordance with the *Biosecurity Act 2015* and relevant ACT legislation. Recommended conditions requiring these plans be developed

and implemented are included at **Section 6** of this report. In response to the revised EIS, ACT Health advised that relevant issues had been addressed, and it had no further comment.

The EIS also identifies anticipated socio-economic benefits to the community, including the diversion of waste from landfill which supports a variety of ACT Government net zero emission goals, associated cost benefits, employment and training for residents in the region, and educations facilities for students to learn and understand the importance of recycling.

3.10.3. Mitigation and avoidance

Table 22 summarises the avoidance and mitigation measures associated with socio-economic and health impacts as proposed in the EIS.

Table 22 Avoidance and mitigation measures (landscape and visual impacts)

Proposed mitigation measure	Stage of implementation
A Construction Biosecurity Management Plan (including a pest and weed management plan) be developed and implemented as part of the CEMP.	Construction
An operational biosecurity management plan be developed and implemented which.	Operation

3.10.4. Scoping document requirements

The table below details the risks associated with socio-economic and health impacts as defined in the EIS.

Table 23 Scoping document requirements (socio-economic and health)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Reduction in amenity during construction (noise, visual, and dust impacts)	Medium	Unlikely	Minor	Very low
Facilities and materials may be a harbourage site for vermin and other pests with impacts on health and social amenity	Medium	Unlikely	Minor	Very low
Impacts from operation harbouring vermin and pest animals.	N/A	Unlikely	Minor	Very low

3.11. Noise and vibration

3.11.1. Impacts

In relation to noise and vibration considerations, the Scoping Document identifies the risk of noise and vibration impacts from construction and operation of the facility, including truck movements.

3.11.2. Key findings

A Noise and Vibration Impact Assessment (NVIA) was undertaken by GHD in 2023 and a further Noise Impact Assessment was undertaken by Muller Acoustics in March 2025. A copy of the assessments are provided at **Appendix O** of the EIS.

The results of the noise modelling assessment demonstrate that noise levels are anticipated to meet the daytime ACT Noise Standard of 65dBA along each of the site boundaries, with the highest noise levels, of up to 64dBA, predicted at the southeast boundary, adjacent to the glass receivals area. However, during the night period, operational noise levels are anticipated to exceed the ACT Noise Standard by up to 2dBA at the southern and southeastern boundaries. The proponent has considered alternate design options, however following consultation with the ACT EPA it was determined that the minor departure from the night-time noise standard occurs within the road reserve where there are no sensitive receivers and that such a minor departure should not cause any concern. Accordingly no additional noise mitigations are considered in the EIS to be required.

In its entity comments, the EPA has supported the revised EIS, subject to conditions which are recommended for inclusion in any future development approval.

3.11.3. Mitigation and avoidance

Table 24 summarises the avoidance and mitigation measures associated with noise and vibration impacts as proposed in the EIS.

Table 24 Avoidance and mitigation measures (noise and vibration)

Proposed mitigation measure	Stage of implementation
Construction hours would comply with Section 9.4 of the Noise Environment Protection Policy. This states that: “In industrial areas, …. noise from building work can only exceed the noise standard between 6am and 8pm.”	Construction
That should the minor departure of 2dB(A) over the night-time noise standard at the sight boundary create issues within the John Cory road reserve, then an Operational Noise Management Plan will be considered at the detailed design stage	Detailed design

3.11.4. *Scoping document requirements*

The table below details the risks associated with noise and vibration impacts as defined in the EIS.

Table 25 Scoping document requirements (noise and vibration)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
On site noise and vibration impacts during operation.	Medium	Unlikely	Minor	Very low
Operation of trucks and machinery on site may create significant sources of noise and vibration.	Medium	Unlikely	Minor	Very low
Disturbance to the local community.	N/A	Unlikely	Minor	Very low

3.12. Hazard, risk, and bushfire

3.12.1. *Impacts*

In relation to hazard, risk and bushfire considerations, the Scoping Document identifies the following risks:

- Impacts from fires at the facility.
- Impacts from fires in the surrounding area.
- Impacts from critical infrastructure failure.
- Impacts on aircraft from bird strike.

3.12.2. *Key findings*

A preliminary hazard analysis (PHA) was prepared for the proposal. The PHA approach was based on a comprehensive hazard identification study to demonstrate that the proposed activities do not pose a significant risk. The PHA process complied with Australian Standard AS 31000:2018 Risk Management – Guidelines. A copy of the PHA is provided at **Appendix P** of the EIS.

In relation to the potential on aircraft bird strike, the EIS notes that processed material would not be organic and would not attract wildlife, processed material would be housed inside the building, and most proposed site activities would be contained within an enclosed building, eliminating access to birds. Canberra Airport was referred the draft and revised EIS and did not object to the proposal, noting that no waste is proposed to be stored indoors and there will therefore be no increased risk of bird strikes associated with airport operations.

In relation to bushfires, a bushfire assessment was prepared for the proposal in accordance with the recently legislated ACT Bushfire Management Standards 2023 (ESA, 2023) and Strategic Bushfire Management Plan 2019-2024 (SBMP v4). Due to changes in the site layout from the initial concept layout used as the basis for the GHD 2023 assessment, to the revised proposal the subject of this final EIS, a further bushfire assessment was undertaken by BlackAsh Bushfire Consulting. A copy of the revised assessments can be found at **Appendix Q** of the EIS. It informs the proposed mitigation and avoidance measures provided below.

ACT Fire and Rescue support the revised EIS, subject to considerations and conditions outlined in **Section 6** of this report.

3.12.3. Mitigation and avoidance

Table 26 below summarises the avoidance and mitigation measures associated with hazard and risk impacts as proposed in the EIS.

Table 26 Avoidance and mitigation measures (hazard, risk and bushfire)

Impact	Proposed mitigation measure	Stage of implementation
Fire at facility	Preparation of a Fire Management Plan to be prepared for construction and operation.	Construction and operation
	Smoke detectors, fire extinguishers, fire blankets, fire hose reels and sprinklers appropriately placed within buildings.	Operation
	An Emergency Management Plan be prepared in line with ACT Emergency Services Agency (ESA) requirements.	Operation
	Detailed design ensure that the layout of the proposal incorporates compartmentation and appropriate features as per AFAC and NSW guidelines for fire safety in waste management facilities (AFAC, 2022) (FRNSW, 2020).	Detailed design
	Separate gates be provided for site access (delivery/pickup heavy vehicles and staff/visitors cars). Fire separation consistent with national construction code fire resistance level and the overall fire strategy of the facility.	Operation
Hazardous/ dangerous chemicals	Each chemical have appropriate labelling, an appropriately sized bund and stored within designated work areas.	Operation
	SWMS and procedures would be implemented for the handling of all chemicals including transfer, storage, spill prevention and clean up requirements.	Operation
	A SDS library would be located on-site that covers all chemicals used and/or stored on-site.	Operation
	Appropriate PPE would be provided for users of chemicals.	Operation
Wildlife strike	Organic material would not be stored on-site.	Operation

Impact	Proposed mitigation measure	Stage of implementation
	Guideline C of NASF, Managing the Risk of Wildlife Strikes in the Vicinity of Airports would be adhered to.	Operation
	Waste would be stored and processed in buildings or vessels.	Operation
	The proposal site would be kept clean and tidy.	Operation
	Waste from office and administration activities would be stored in appropriate bins (with lids).	Operation
	A Waste Management Plan would be created for the proposal site to continuously manage and monitor waste.	Operation
	Any unwanted putrescible waste sources would go into waste bins to be taken to landfill.	Operation
Failure of critical infrastructure	A regular maintenance schedule would be developed and undertaken by qualified personnel.	Operation
	Adequate training would be provided on operating machinery.	Operation
	The following plans would be developed to manage critical infrastructure: • Business Continuity Plan • Asset Management Plan	Operation
Bushfire	A bushfire prevention and response plan would be prepared as part of the CEMP, providing relevant information for fire and emergency service responders and project personnel.	Construction and operation
	An APZ would be provided in accordance with ACT Bushfire Management Standards (ESA, 2023). Appropriate fire shielding, such as a Colourbond fence would be installed to supplement the APZ.	Detailed design
	Primary access would be provided to meet set out requirements.	Detailed design
	APZ landscaping would comply with the ACT Bushfire Management Standards (ESA, 2023) fuel management standards and be guided by the fuel management principles. These would be managed by the site operator.	Operation
	An Emergency Management and Evacuation Plan would be prepared for the proposal in compliance with the requirements set out in the ACT Bushfire Management Standards (ESA, 2023) and updated prior to construction, operation and occupancy of the MRF.	Construction and operation
	The provision of shielding (non-combustible fencing) to the perimeter of the block would be considered in detailed design to assist with prevention of fire travel into the facility from grassland hazard in the event of a bushfire.	Detailed design
Facility fire	Detailed design would ensure that the layout of the MRF would incorporate compartmentation and	Operation

Impact	Proposed mitigation measure	Stage of implementation
	appropriate features as per AFAC and NSW guidelines for fire safety in waste management facilities (AFAC, 2022) (FRNSW, 2020).	

3.12.4. Scoping document requirements

Table 26 below details the risks associated with hazard and risk impacts as defined in the EIS.

Table 26 Scoping document requirements (hazard, risk and bushfire)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Fire at facility	Medium	Unlikely	Moderate	Low
Hazardous chemical spills	Medium	Unlikely	Minor	Very low
Failure of critical infrastructure	Medium	Unlikely	Moderate	Low
Impacts on aircraft from bird strike	Medium	Remote	Moderate	Very low
Pilot distraction from lighting	Low	Remote	Minimal	Negligible
Potential risk of bushfire during construction from sparks, heat, fuel storage, and general works	Medium	Unlikely	Moderate	Low
Potential impact of bushfires affecting operation of the facility	Low	Unlikely	Moderate	Low
Impacts from fires in the surrounding area.	NA	Unlikely	Moderate	Low

3.13. Heritage

3.13.1. Impacts

In relation to heritage, the Scoping Document identifies the risk of impacts to Heritage objects and/or places.

3.13.2. Key findings

A Cultural Heritage Assessment (CHA) was undertaken for the proposal to assess potential for heritage impacts relating to the proposal and site. A copy of the CHA is included at **Appendix R** of the EIS.

The following heritage values were identified on and in proximity to the site. Notably, potential direct and indirect impacts during construction were identified for HMRF01, NW1/PAD1, and Hume Site 1. No operational impacts are expected on any Heritage objects and/or places.

HMRF01 is an Aboriginal artefact scatter recorded during the site surveys within the northeast section of the proposal site. This site consisted of three lithic artefacts, one of which was a conjoin flake in two pieces, located within an exposure used as a vehicle turning circle. Disturbance at this site is extremely high. The potential for there to be additional artefacts was assessed as moderate, and the potential for there to be any subsurface archaeological deposit was assessed to be low. HMRF01 has been subject to surface salvage collection.

NW1/PAD1 is a previously recorded Aboriginal heritage site located within the proposal site. It has been previously subject to surface salvage and subsurface testing, following these actions it was recommended that no further action was required at its location.

Hume Site 1 is located in proximity of the proposal site. All information about the nature and precise location of Hume Site 1 has been declared restricted under the Heritage Act 2004. The ACT Heritage Council raised concerns about the potential impacts that noise, vibration, flooding and water runoff from construction and operation of the proposal would have on Hume Site 1. Noise and vibration and hydrological assessments indicate the proposal will not pose an increased risk to Hume Site 1.

In response to the draft and revised EIS, The Heritage Council determined heritage impacts have been adequately addressed, subject to conditions which are recommended to form part of any future development approval.

3.13.3. Mitigation and avoidance

Table 27 below summarises the avoidance and mitigation measures associated with heritage impacts as proposed in the EIS.

Table 25 Avoidance and mitigation measures (heritage)

Potential Impact	Proposed mitigation measure	Stage of implementation
Impacts to known heritage sites NW1/PAD 1 and HMRF01	Long-term management outcomes for all artefacts collected in association with HMRF01 would be developed in consultation with the RAOs following completion of the assessment for the adjacent proposed FOGO facility.	Following completion of assessment for the proposed FOGO facility
	All proposal personnel, including contractors, would be made aware of the heritage status of the NW1/PAD 1 and HMRF01 sites prior to impacts.	Prior to construction and construction

Potential Impact	Proposed mitigation measure	Stage of implementation
Impacts to unknown heritage sites	The protocols for the unanticipated discovery of archaeological material and suspected human remains (presented in Appendix 6 of the CHA) would be adopted and complied with during construction activities involving ground surface disturbance and excavation.	Construction
Impacts to Hume Site 1	If calcareous deposits are encountered during construction, then work would stop and the unanticipated discovery protocol for palaeontological material (presented in Appendix 5 of the CHA) would be adopted and complied with. The fenced area along Dog Trap Creek contains the area associated with the revised boundary of Hume Site 1. All proposal workers would be made aware of the fenced area and that it should not be removed or disturbed during construction.	Construction

3.13.4. Scoping document requirements

Table 28 below details the risks associated with heritage impacts as defined in the EIS.

Table 28 Scoping document requirements (heritage)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**

Direct or indirect impact to Aboriginal archaeological potential or places with high Aboriginal cultural values	Low	Unlikely	Moderate	Low
Unexpected finds of Aboriginal archaeological potential or places with high Aboriginal cultural value	N/A	Remote	Moderate	Low

3.14. Conclusion of impact assessment

The supporting studies and the comments of relevant entities provide sufficient information on all identified impacts of the proposal identified above.

4. Policy considerations

Legislative requirements and ACT policies were considered in the preparation of the EIS included:

4.1.1. Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The EPBC Act is the Commonwealth's primary environmental legislation, designed to protect Matters of National Environmental Significance (MNES), including threatened species, ecological communities, and heritage places. The Act requires referral to the Commonwealth if a proposal is likely to significantly impact MNES. The EIS includes a biodiversity assessment (Chapter 12 and Appendix L), which concludes that the proposed MRF will not impact MNES, and therefore does not require referral. The proposal is not considered a controlled action under the EPBC Act, and no further Commonwealth assessment is needed.

4.1.2. Planning Act 2023

Although the *Planning and Development Act 2007* has been repealed, transitional provisions under Section 636 of the *Planning Act 2023* allow the EIS to be assessed under both the former and current legislation. The proposal meets the criteria for "Significant Development" due to its scale and the requirement for an EIS. It also satisfies triggers under Schedule 4 of the former PD Act and Schedule 1 of the *Planning Regulation 2023*, ensuring compliance with both frameworks.

4.1.3. Planning Regulation 2023

The *Planning Regulation 2023* outlines specific development types that require an EIS. The proposed MRF triggers Items 13 and 14 in Schedule 1, as it is a recycling facility handling over 115,000 tonnes annually and expanding from a previous capacity of 65,000 tonnes. These thresholds confirm the necessity of an EIS and classify the project as significant development.

4.1.4. Waste Management and Resource Recovery Act 2016

This Act provides the licensing framework for waste facilities and defines key terms such as waste, waste activity, and waste facility. The proposed MRF qualifies under these definitions and will require a waste facility licence under Section 22. The Act supports the ACT Waste Management Strategy 2011–2025, promoting waste minimisation, resource recovery, and innovation. The MRF will also comply with requirements for waste transporters and codes of practice under Part 10A.

4.1.5. Environment Protection Act 1997

The EP Act regulates environmental protection in the ACT, including pollution control and contaminated land management. The MRF qualifies as a Class A activity under Schedule 1 Item 45, requiring an Environmental Authorisation from the EPA. The EIS includes mitigation strategies to prevent environmental harm, aligning with the Act's objectives and addressing offences under Sections 137–139.

4.1.6. Environment Protection Regulation 2005

This regulation supports the EP Act by detailing offences related to emissions and setting standards for noise and sediment control. The proposal includes an Erosion and Sediment Control Plan (ESCP) and meets noise standards outlined in Chapter 17 and Appendix O. Although the regulation lacks specific odour and air quality criteria, the EIS includes assessments based on NSW and national guidelines (Appendix M).

4.1.7. Urban Forest Act 2023

Replacing the *Tree Protection Act 2005*, this Act aims to enhance urban biodiversity and achieve 30% tree canopy cover. The site contains regulated trees, including three adjacent to John Cory Road and others in the Mugga Lane Road reserve. The proposal ensures retention of all regulated trees and will seek approval from the Conservator if any removal or damage is necessary.

4.1.8. Heritage Act 2004

The Heritage Act protects heritage places and objects, including Aboriginal heritage. The EIS addresses heritage considerations in Chapter 20 and Appendix R, confirming that the proposal will not diminish heritage significance or require approval from the ACT Heritage Council.

4.1.9. Nature Conservation Act 2014

This Act protects biodiversity and threatened species in the ACT. The EIS includes ecological assessments (Chapter 12 and Appendix L), which show that the proposal will not significantly impact native species or ecological communities. Any necessary approvals or licences will be obtained to comply with the Act.

4.1.10. Water Resources Act 2007

The Water Resource Act ensures sustainable water resource management. The proposal does not involve constructing or altering water resources, so a Waterways Works Licence is unlikely to be required. Sampling of the on-site dam is recommended to ensure no contamination occurs.

4.1.11. Public Health Act 1997

This Act manages public health risks. The proposal is unlikely to be declared a public health risk, as it will operate under an EPA licence. The Minister is expected to refrain from declaring the activity a risk, provided Veolia, the future operator, complies with licensing requirements.

4.1.12. Utilities (Technical Regulation) Act 2014

The Act regulates dam safety and utility services. The dam on the proposal site does not meet the criteria for a registrable dam (i.e., over 5m high or 250ML capacity). However, sampling is recommended to ensure no contamination, and any specific requirements will be addressed during detailed design.

4.1.13. Climate Change and Greenhouse Reduction Act 2010

This Act promotes emission reduction and climate resilience. While it does not regulate waste directly, the proposal supports its objectives by reducing landfill waste and greenhouse gas emissions. The EIS includes assessments of climate change impacts and mitigation measures.

4.1.14. Work Health and Safety Act 2011

The WHS Act ensures safe working environments. The proposal will comply with WHS requirements during construction and operation, promoting worker safety, consultation, and continuous improvement in health and safety standards.

Other Statutory Provisions

4.1.15. National Capital Plan

Administered by the National Capital Authority, the NCP sets strategic land use policies for Canberra. The proposal site is within an Urban Area and adjacent to a Designated Area (Monaro Highway). It complies with Development Control Plan (DCP 171/09/0001), which governs building scale, setbacks, landscaping, and access.

4.1.16. Territory Plan 2023

The Territory Plan provides the statutory framework for land use in the ACT. The proposal aligns with Industrial Zone and District Policies and will be assessed under the outcomes-based framework introduced in 2023. Supporting materials such as design guides may be referenced during assessment.

4.1.17. ACT Planning Strategy 2018 and District Strategy

The Planning Strategy outlines long-term goals for a sustainable, resilient, and compact city. The proposal supports strategic directions such as protecting industrial land and improving resource efficiency. The East Canberra District Strategy reinforces the site's role in regional economic development and transport connectivity.

4.1.18. ACT Climate Change Strategy 2019–2025

This strategy aims for net zero emissions by 2045. The proposal supports waste avoidance and emission reduction goals, including Goal 6A to reduce waste generation. The MRF will promote community education and be designed to meet 4-star Green Star standards, although formal certification is not sought.

4.1.19. Canberra's Living Infrastructure Plan (2019)

The plan promotes green infrastructure to combat climate change. The proposal includes landscaping and adheres to a 50% site coverage limit, supporting tree canopy and permeable surface targets.

4.1.20. Separation Distance Guidelines for Air Emissions (2018)

These guidelines recommend buffer zones between emitters and sensitive uses. The EIS considers these in its air quality assessment (Chapter 14), ensuring minimal impact on surrounding areas and protecting industrial viability.

4.1.21. ACT Waste Management Strategy 2011–2025

The strategy promotes full resource recovery and a carbon-neutral waste sector. The proposal supports all four outcomes—less waste, full recovery, clean environment, and reduced emissions—through improved technology, education, and regional collaboration. It also supports strategies for market development and infrastructure in the Hume Resource Recovery Estate (HRRE).

4.1.22. ACT Waste Feasibility Study (2018)

The study outlines best practices for waste management and aims to increase resource recovery to 90%. The proposal supports key recommendations, including enhanced recycling and glass processing, and contributes to diverting over 170,000 tonnes of waste from landfill.

4.1.23. ACT Circular Economy Strategy and Action Plan 2023–2030

This strategy promotes circular economy principles. The proposal directly supports the action to build a new MRF with advanced sorting and processing capabilities, fostering regional collaboration and innovation. It aligns with goals for procurement, innovation, and waste stream management.

4.1.24. Environmental Protection Guidelines for Construction and Land Development

These guidelines provide best practices for construction impacts. The proposal will implement a Construction Environmental Management Plan (CEMP) to address erosion, noise, air quality, waste, and biodiversity during construction.

4.1.25. Contaminated Sites Environment Protection Policy 2017

This policy guides the management of contaminated land. A Preliminary and Targeted Site Investigation confirms low risk to human health. The site is considered contaminated under the precautionary principle, and mitigation measures are included.

4.1.26. Ecologically Sustainable Development

The proposal is assessed against principles of ecological integrity, economic prosperity, precaution, and intergenerational equity. It avoids greenfield expansion, supports biodiversity, and provides long-term environmental and social benefits. Mitigation measures include habitat restoration and fauna connectivity improvements.

4.1.27. Heavy Vehicle National Law

The HVNL regulates vehicles over 4.5 tonnes. Most vehicles accessing the site will fall under this category and must comply with safety and operational standards under five supporting regulations.

4.1.28. National Airport Safeguarding Framework

The site is within 10 km of Canberra Airport. The MRF will be fully enclosed, with no open waste storage, reducing bird attraction risk. Canberra Airport has no objection to the proposal, subject to further review at the DA stage.

5. Other considerations

5.1. Principles of ecologically sustainable development

The following ecologically sustainable development principles have been considered at **Section 3.3.12** of the revised EIS, and by the Authority.

5.1.1. Economic, environmental, social and equitable considerations

The long-term and short-term economic, environmental, social, and equitable considerations have been considered by the Authority in the preparation of this Report. The Authority is satisfied that information relating to the above considerations and the cumulative impacts, have been provided in the EIS.

5.1.2. The precautionary principle

The precautionary principle has been considered in the assessment, and the proponent has provided sufficient information relating to all potential environmental impacts and has proposed mitigation measures to be adopted during the construction and operation phases.

5.1.3. The principle of inter-generational equity

The proposal will provide the ACT with the capability to recycle materials within the Territory. The current social and environmental cost of having an inoperable recycle facility means that funds are being used to transport recyclables inter-state for processing at a considerable cost to the Territory.

The EIS notes that the proposal will provide additional benefits to future generations including employment, community environmental awareness, supporting a carbon neutral waster sector, and efficiently utilising existing industrial land.

5.1.4. The conservation of biological diversity and ecological integrity

Section 12 of the EIS and Section 3.6 of this report outlines how the proposal considers and mitigates impacts on biodiversity and nature conservation.

5.1.5. Improved valuation, pricing and incentive mechanisms

Improved valuation, pricing, and incentive mechanisms have been considered. The EIS states that the proposal optimises the valuation and pricing of the land resources within the Hume Resource Recovery Estate with minimal environmental impact by maximising the efficient use of a brownfield resource. The proposal is largely on developed land and would replace an existing facility.

6. Recommended conditions

After considering the revised EIS, the Authority recommends DA considerations to assist with the avoidance, mitigation of adverse environmental impacts, as outlined in Table 11.

Any DA related to the completed EIS must include the DA considerations as part of the application.

Table 6 Draft Conditions of Development Approval for the proposal

No.	Condition contents	Endorsement/approval	Construction stage	Draft condition of approval
1	General	Territory Planning Authority (TPA)	All works	1.1 All works must be consistent with the mitigation measures in Table 22.1 of the ACT Materials Recovery facility – revised, prepared for Veolia Environmental Services (Australia) Pty Ltd dated 13 August 2025 (the EIS).
2	Construction Traffic and Site Access	TCCS (CED)	Before to construction	2.1. Prior to construction, a Construction Traffic Management Plan (CTMP) must be prepared and implemented, including: • Traffic guidance schemes and signage. • Defined haulage routes to minimize impacts on sensitive receptors. • Measures to maintain pedestrian and cyclist access. • Consultation with relevant road authorities. • Monitoring traffic arrangements and road conditions. • Induction of all staff and contractors on CTMP requirements. 2.2. All construction and operational vehicles must comply with road rules and park within the site. Public roads must not be used for long-term parking. 2.3. Carpooling and shuttle services for workers must be explored and implemented where feasible. 2.4. Internal haulage routes must separate light and heavy vehicles. All vehicles must move in an anticlockwise direction within the site to minimize conflict points. 2.5. Emergency vehicle access must be maintained at all times, and emergency services must be notified of any changes to traffic arrangements.

3	Utilities and Services Management plan	Evoenergy and Icon Water	Before to construction	3.1. Utility locations must be confirmed during detailed design in consultation with service providers. BYDA must be conducted prior to construction. 3.2. The CEMP must include erosion and sediment controls to prevent contamination from utility works. 3.3. Evoenergy and Icon Water must be consulted during detailed design to confirm service capacity.
4	Waste and Materials Management	Environment Protection Authority (EPA)	Before to construction and Prior to operation	4.1. A Demolition and Construction Waste Management Plan must be prepared prior to construction, incorporating waste hierarchy principles and classification and disposal procedures. 4.2. An Operational Waste Management Plan (OWMP) must be prepared prior to operation, detailing waste streams, handling, classification, disposal, and contingency plans.
5	Landscape and Visual Impact	TPA	During Construction	5.1. Construction equipment and storage areas must be screened from sensitive views. 5.2. Night works must be avoided where possible. Tree protection and rehabilitation of disturbed areas must be implemented. 5.3. Visual screening and landscaping must align with DCP guidelines and ACT heritage values. 5.4. Signage must be minimal and integrated into building design.
6	Soil, Geology, and Contamination	TPA Environment Protection Authority (EPA)	Before construction	6.1. A CEMP must be prepared and submitted to the territory planning authority (EPDImpact@act.gov.au) for endorsement. The CEMP must outline the construction conditions/methods and temporary environmental protection measures to manage the impact of construction activities, consistent with the EIS. 6.2. Hazardous material surveys and asbestos assessments must be completed prior to demolition. 6.3. Drainage improvements must be implemented to protect Dog Trap Creek.

				6.4. Washdown areas must be provided for contaminated material transport. 6.5. Spill kits, bunding, and SDS sheets must be available on-site. All spills must be logged and reported.
7	Water Quality and Hydrology	TPA	Before construction	7.1. A Water Management Plan (WMP) must be developed for construction, including sediment basins and runoff controls. 7.2. An Operational Water Management Plan (OWMP) must manage wastewater, spills, and littering. 7.3. All stormwater infrastructure must comply with ACT Water Sensitive Urban Design standards. 7.4. The stormwater discharge point must be designed to prevent downstream erosion, demonstrated through hydraulic modelling. 7.5. Stormwater retention must be maximized on-site for reuse to reduce potable water demand and discharge volumes.
8	Biodiversity and Conservation	Conservator of Flora and Fauna	Before construction	8.1. A Flora and Fauna Management Plan (FFMP) must be developed prior to construction, including fencing and revegetation of habitat corridors, minimization of vegetation removal, and wildlife carer presence during clearing. 8.2. A Weed and Pest Management Plan (WPMP) must be developed, including herbicide use, exclusion zones, vehicle washdowns, and monitoring. 8.3. Further analysis of habitat connectivity impacts must be undertaken, with details on management of retained grassland and dam areas to improve ecological function.
9	Socioeconomic and Health	Environment Protection Authority (EPA)	Before construction	9.1. A Construction Biosecurity Management Plan must be included in the CEMP. 9.2. An Operational Biosecurity Management Plan must be implemented, including pest control and covered deliveries.
10	Air Quality and Odour	Environment Protection Authority (EPA)	During construction	10.1. A Dust Control Protocol must be included in the CEMP, with suppression measures, complaint procedures, and monitoring.

				10.2. Dust collector systems must be installed in high-emission areas. 10.3. An Odour Management Procedure must be implemented, including complaint handling, segregation of odorous materials, and sealed drainage. 10.4. Air quality monitoring and inspections must be conducted regularly. Sorted materials must be covered during transport
11	Greenhouse Gas Emissions		Before and During construction	11.1. Low-carbon construction materials and methods must be considered. 11.2. Diesel use must be minimized and alternatives explored. 11.3. Equipment must be maintained to reduce emissions. 11.4. An independent sustainability rating or equivalent must be pursued
12	Climate Change Adaptation	Climate Change and Energy Division	During construction	12.1. WHS plans must be updated for extreme heat conditions. 12.2. Additional flood protection structures must be considered. 12.3. Facility design must comply with wind and earthquake loading standards
13	Noise and Vibration	Environment Protection Authority (EPA)	During construction	13.1. Construction hours must comply with ACT noise policies. 13.2. An Operational Noise Management Plan must be considered if night-time noise exceeds acceptable levels
14	Hazard and Risk Management	ACT Fire and Rescue (ACT F&R)	Before construction	14.1. A Fire Management Plan and Emergency Management Plan must be developed. 14.2. Fire safety infrastructure including sprinklers, thermal imaging, and compartmentation must be installed. 14.3. Chemical handling must follow SWMS and SDS protocols. 14.4. Wildlife strike risks must be managed through site cleanliness and waste containment. 14.5. A Business Continuity Plan and Asset Management Plan must be developed.
15	Bushfire Management	ACT Fire and Rescue (ACT F&R)	Before construction	15.1. A Bushfire Prevention and Response Plan must be included in the CEMP.

				15.2. Asset Protection Zones (APZs) and fire shielding must be incorporated into detailed design. 15.3. Emergency access and evacuation plans must comply with ACT Bushfire Management Standards. 15.4. Internal and perimeter roads must be designed to accommodate ACTF&R CAFS 8000 vehicles, with appropriate pavement loading and turning radius. 15.5. All emergency access gates must be fitted with standard Fire Brigade locks
16	Heritage Protection	ACT Heritage Council	Before construction	16.1. All disturbances must be contained within the mapped 'Updated Impact Area' as per Figure 2 in the Addendum Cultural Heritage Assessment (CHA). Any disturbance beyond this boundary must be referred to the ACT Heritage Council. 16.2. A Return to Country outcome for Aboriginal objects recovered from HMRF01 must be developed within two years of the date of advice, in consultation with Aboriginal stakeholders. 16.3. The Unanticipated Discovery Protocols outlined in Appendix 1 of the Addendum CHA must be adhered to for the duration of ground-disturbing works and incorporated into the CEMP. 16.4. Restricted heritage information must not be included in any publicly exhibited documents, reports, or plans. 16.5. Vegetation or visual impact mitigation measures must not damage Aboriginal places or objects, nor diminish the significance of registered heritage places. Any proposed screening within or adjacent to heritage curtilage must be referred to the ACT Heritage Council
17	Icon Water Requirements	Icon Water	Before and during construction	17.1. The proponent must consult with Icon Water to confirm the adequacy of existing infrastructure, including hydrant spacing, and ensure compliance with Fire Risk Type 5 (FRT5) requirements, including a minimum firefighting flow provision of 150 L/s.

				17.2. The glass washing component of the proposal must not proceed until Icon Water confirms that the wastewater network can accept the proposed discharge volumes and quality. 17.3. The proponent must follow Icon Water's Service and Installation Rules and Asset Creation and Acceptance processes for all new connections and infrastructure upgrades. 17.4. The proponent must provide updated information to Icon Water as it becomes available. Any changes to the proposal may require reassessment by Icon Water.
18	EPA Requirements	Environment Protection Authority (EPA)	Before construction	18.1. The targeted site investigation referenced in the EIS must be submitted to the ACT Environment Protection Authority (EPA) for review and endorsement prior to commencement of development. 18.2. An Environmental Authorisation must be obtained from the EPA under the Environment Protection Act 1997 to operate a waste transfer station receiving 30,000 tonnes or more of waste annually.

7. Recommended action on this EIS

Having regard to the documentation and information provided, the Authority has assessed the ACT Material Recovery Facility revised EIS as meeting the requirements of Chapter 8 of the PD Act.

It is the Authority's assessment that the revised EIS has provided sufficient information to the ACT Government and the community to allow an informed evaluation of potential environmental impacts which could be attributed to the proposal. The proponent has proposed a range of avoidance, mitigation and management measures to reduce and avoid potential environmental impacts arising from construction and operational activities associated with the project. It is considered that any potential adverse impacts can be adequately addressed by implementing these measures and the development application conditions specified in this report.

The Authority's recommendation is that the Minister need take no action in relation to the revised EIS. The Minister may however, decide to present the revised EIS to the Legislative Assembly. This action does not affect an EIS being complete in accordance with section 209 of the Act.

Appendix 1 – Final scoping document

ACT Government
Environment, Planning and Sustainable Development

Scoping Document

Under Division 8.2.2 of the *Planning and Development Act 2007*

APPLICATION NUMBER: 202200011		**DATE OF THIS NOTICE:** 21 July 2022
DATE LODGED: 8 June 2022		
PROJECT: Materials Recovery Facility Huma ACT PMCA - upgrades to the existing Hume Materials Recovery Facility (MRF), delivering additional warehouse structures, hardstand facilities, and other associated works to augment current operations. The upgraded MRF is expected to have a capacity of 115,000 tonnes per annum.		
IMPACT TRACK TRIGGER: Schedule 4, Part 4.2, Item 10 of the *Planning and Development Act 2007.* Other triggers may also apply.		
BLOCKS: 6 & 10	**SECTION:** 25	**DIVISION:** Hume
ADDRESS: Corner of John Cory Road and Recycling Road, Hume, ACT 2620		
PROPONENT: ACT NoWaste (Transport Canberra and City Services - TCCS)		
APPLICANT: GHD Pty Ltd		
LESSEE/LAND CUSTODIAN BLOCK 6: ACT NoWaste (TCCS) **LESSEE/LAND CUSTODIAN BLOCK 10:** ACT NoWaste (TCCS)		

SCOPING DOCUMENT

The planning and land authority (the Authority) within the Environment, Planning and Sustainable Development Directorate received your application under section 212(1) of the *Planning and Development Act 2007* (the PD Act) for Scoping of an Environmental Impact Statement (EIS) for the above proposed development. Pursuant to section 212(2) of the PD Act, the Authority has:

a) Identified the matters that are to be addressed by an EIS in the relation to the development proposal; and

b) Prepared this written notice (the ***scoping document***) of the matters.

NB: The EIS must conform to the requirements of this scoping document. This document does not indicate approval or support in any way, nor does it indicate approval in principle.

TERM OF SCOPING DOCUMENT

Pursuant to section 213(2) of the PD Act, the proponent must give the draft EIS to the Authority by the end of the period of 18 months starting on the day the Authority gives the scoping document for the development proposal to the applicant.

FORM AND FORMAT OF EIS

The Authority requires that the proponent engage a suitably qualified independent consultant to prepare an EIS, OR the proponent submits, with the draft EIS, an independent review of the draft EIS undertaken by a suitably qualified consultant. The EIS must be in the following form and format:

- The EIS must be prepared in accordance with section 50 of the *Planning and Development Regulation 2008.*
- The EIS must be written in plain English and avoid the use of jargon as much as possible.
- The EIS is required to be provided in the same structure as described in this Scoping Document as closely as possible. A table that cross-references the EIS to the scoping document must be included in the EIS submission.
- The report must reference any figures or supporting information used to the supporting appendix and page number, table or figure.
- Additional technical detail, including relevant data, technical reports and other sources of the EIS analysis must be provided in appendices.
- Maps, diagrams and other illustrative material should be included in the EIS to assist readers to interpret information.
- The EIS document sized A4 with maps and drawings in A4 or A3 format.
- The proponent must supply a copy of all draft EIS and revised EIS documents in electronic formats for circulation and web posting. These are to be supplied by email, USB, or another agreed method.
- Digital files must not exceed 20 MB each.

COST OF PREPARATION OF EIS

The proponent is responsible for the preparation of the draft and revised EIS and any related applications and associated costs. This includes additional copies of the draft and revised EIS and other associated documents as required by the Authority from time to time.

NEXT STEPS

The proponent is now required to prepare a document (a ***draft EIS***) that addresses each matter raised in this scoping document for the proposal within the timeframe provided. Once the draft EIS has been accepted for lodgement, a public notification fee is payable in order for notification, referrals and assessment to commence. After the notification period has closed, the Authority will provide comments and any public representations received for the proponent to address in preparing a ***revised EIS***, and any further instructions on the application.

If you have any queries about the requirements outlined in this scoping document, please contact Hayden Pini to arrange a suitable time to discuss.

Delegate of the planning and land authority
George Cilliers
Executive Group Manager
Statutory Planning Division
Environment, Planning and
Sustainable Development Directorate

Contact
Hayden Pini
Development Assessment Officer
Impact Assessment
Environment, Planning and
Sustainable Development Directorate
E: Hayden.Pini@act.gov.au
T: (02) 6207 8728

GENERAL REQUIREMENTS FOR THE EIS

1. Cover Page

The cover page must clearly display the following:

- The name of the proposal (project title)
- The block identifier(s) and street address for the proposal
- The date of the preparation of the document
- Full name and postal address of the designated proponent
- Full name and postal address of the designated applicant
- Name and contact details of the person/organisation who prepared the documents (if different to the above)

2. Glossary

Provide a glossary of technical terms, acronyms and abbreviations used in the EIS.

3. Executive Summary

Provide a non-technical summary of the EIS including a description of the proposal, key findings and recommendations.

4. Introduction

Summarise the proposal background and justification for the proposal.

5. Proposal Details

5.1. Project Description

Provide a description of the proposal, including:

a) The objectives and justification for the proposal;

b) The location of the land to which the proposal relates, including detailed maps;

c) The division and/or district names and block and/or section numbers of the land under the *Districts Act 2002;*

d) If the land is leased – the lessee's name;

e) If the land is unleased or public land – the custodian of the land;

f) The purposes for which the land may be used;

g) A clear identification of all lands subject to direct disturbance from the proposal and associated infrastructure and geomorphic features such as waterways and wetlands. This is to be supported by a map showing all affected lands;

h) An outline of any developments that have been, or are being, undertaken by the proponent, or other person(s) or entities, within the proposal area and broadly in the region. Describe how the proposal relates to these developments;

i) A description of all the components of the proposal, including the proposal specifications, the predicted timescale for implementation (design, approvals, construction and decommissioning) and project life;

j) A plan/description of the precise location of any works to be undertaken, structures to be built or elements of the proposal that may have relevant impacts; and

k) A description of the construction methodologies for the proposal.

5.2. Alternatives to the proposal

For background, provide details of any alternatives to the proposal considered in developing the proposal including a description of:

a) Any alternatives to the proposal and provide reasons for selecting the preferred option with an analysis of site selection as an attachment to the EIS;

b) The criteria used for assessing the performance of any alternative to the proposal considered;

c) Any matters considered to avoid or reduce potential impacts prior to the selection of the preferred option; and

d) Details of the consequences of not proceeding with the proposal.

6. Legislative and Strategic Context

A description of the EIS process including any statutory approvals obtained or required for the proposal, and how the proposal is aligned with strategic priorities for the ACT.

6.1. Statutory requirements

The description must include information on statutory requirements for the preparation of an EIS:

- *Planning and Development Act 2007 (including confirmation of relevant Schedule 4 triggers based on impacts identified in the scoping document and any studies undertaken in preparing the draft EIS)*
- *Planning and Development Regulation 2008*
- *Waste Management and Resource Recovery Act 2016*
- Other related statutory approvals.

6.2. Climate change

The EIS must include information on how the proposal will reduce the risks from climate change impacts and include proposed adaptation measures to reduce vulnerability and increase resilience of the community and the Territory, particularly the extreme events of heatwaves, droughts, storms with flash flooding and bushfires. The information must address impacts on the local microclimate and how it will avoid contribution to urban heat and positively contribute to urban cooling measures.

Additionally, the EIS must address the contribution the proposal will make to reducing greenhouse gas emissions and meeting the legislated target for a net zero emissions Territory (by 2045 at the latest).

Preparation of the EIS must consider the relevant sections of ACT Government's following policies:

- ACT Climate Change Strategy 2019-2025
- Canberra's Living Infrastructure Plan: Cooling the City

6.3. Other requirements

The description must also include information on how each of the following has been considered in the preparation of the EIS and the development of the proposal:

- Territory Plan 2008, including the Statement of Strategic Directions (Section 2.1)
- ACT Planning Strategy
- National Capital Plan
- Sustainability Policies
- *Climate Change and Greenhouse Gas Reduction Act 2010*
- ACT Waste Management Strategy 2011-2025
- Relevant environment protection policies and guidelines for air, noise, and odour emissions; the management of stockpiles; and the handling of non-domestic liquid trade waste
- Environmental Protection Guidelines for Construction and Land Development in the ACT
- Contaminated Sites Environment Protection Policy 2017
- *Environment Protection Act 1997*
- *Environment Protection Regulation 2005*
- *Heritage Act 2004*
- *Nature Conservation Act 2014*
- *Public Health Act 1997*
- *Utilities (Technical Regulation) Act 2014*
- *Utilities (Technical Regulation) (ACT Dam Safety Code) Approval 2018*
- Plans of Management for any public land
- Any relevant Master Plan
- Other relevant planning and environmental guidelines and management plans.

6.3.1. Ecologically sustainable development (ESD)

Provide a description of how the proposed development demonstrates ESD. This is to include long-term and short-term considerations related to economic development, social development and environmental protection at local, regional, and national scales. The proponent should ensure that the EIS adequately addresses the ESD principles as defined by section 9 of the PD Act.

6.3.2. Territory Plan strategic directions

A statement must be provided regarding the proposal's compatibility with the principles in the Statement of Strategic Directions in the Territory Plan 2008 (Section 2.1 - Strategic Direction).

7. Risk Assessment

7.1. Risk Assessment Methodology

Provide a risk assessment in accordance with the Australian and New Zealand Standard for risk management AS/NZS ISO 31000:2009 *Risk Management – Principles and guidelines.* The proposed criteria for determining which risks are potentially significant impacts must be described.

The Preliminary Risk Assessment (PRA) submitted as part of the request for a scoping document must be revised to include, but not be limited to, the risks identified by the Authority in Table 1.
The risks identified in Table 1 are based on the scoping document application and comments received from entities on the application. All of these risks are considered potentially significant (i.e. a medium risk level or above), and must be addressed in the EIS. Should any risk levels change during the preparation of the EIS or any new risks become apparent, these must be assessed and included with a justification in the EIS, and where relevant, the residual risk assessment.

-Assessment guide-			
Provide a table with the headings below to describe the risks identified and the original risk rating without any mitigation strategies in place. This table format is one option, however alternative formats can be used provided the methodology is clearly described and in accordance with AS/NZS ISO 31000:2009 *Risk Management – Principles and guidelines*			
Risk	Likelihood	Consequence	Risk rating

8. Assessment of Impacts

Sufficient information is required to provide the Authority with an adequate understanding of the environmental impacts associated with the proposal. Table 1 identifies the potentially significant risks considered by the Authority that must be addressed in the EIS. The risks and their associated risk levels were determined from the information submitted with the PRA, comments received from entities on the request for scoping document application and the Authority's risk assessment. Each potentially significant impact rated with a risk rating of medium and above as identified in the risk assessment must be addressed, and structured as outlined in the table below, with the information required by sections 8.3.1-8.3.13 of this scoping document.

Table 1 – Identified impacts and requirements to be addressed in the EIS

Environmental Theme	Risk identified	See section/s below for further detail
Planning and land status	• Sterilisation of surrounding land uses.	8.2.1
Traffic and transport	• Traffic impacts from construction and operation of the facility.	8.2.2
Utilities and infrastructure	• Impacts on existing utilities and infrastructure. • Impacts from required upgrades to existing utilities and infrastructure.	8.2.3
Materials and Waste	• Impacts from excess stockpiling of recyclable and non-recyclable materials and waste. • Increased waste to landfill during construction and operation. • Impacts from spread of waste. • Impacts from hazardous waste and/or chemicals stored/received at the facility.	8.2.4
Landscape and Visual	• Visual impacts from the facility and its operation	8.2.5
Soils and Geology	• Impacts from the disturbance of existing contaminated soils. • Contamination of soils arising from	8.2.6

Environmental Theme	Risk identified	See section/s below for further detail
	construction and facility operations.	
Water Quality and Hydrology	• Contamination of groundwater. • Impacts on stormwater and surrounding waterways, such as Dog Trap creek.	8.2.7
Biodiversity and Nature Conservation	• Impacts on Flora and Fauna. • Impact on protected matters due to facilitation of weed, pest and pathogen spread.	8.2.8
Socio-economic and Health	• Impacts from operation harbouring vermin and pest animals.	8.2.9
Climate Change and Air Quality	• Increased greenhouse gas emissions. • Air quality impacts, including cumulative impacts. • Impacts on facility operations from increase in frequency of extreme climatic events.	8.2.10
Noise and Vibration	• Noise and vibration impacts from construction and operation of the facility, including truck movements.	8.2.11
Hazard and Risk	• Impacts from fires at the facility. • Impacts from fires in the surrounding area. • Impacts from critical infrastructure failure. • Impacts on aircraft from bird strike.	8.2.12
Heritage	• Impacts to Heritage objects and/or places.	8.2.13

8.1. Standard requirements

Each potentially significant environmental impact identified within Table 1 should be addressed/structured as per sections 8.1.1 - 8.1.5.

-Assessment Guide-		
Assessment Scenarios: Proponent should describe and use baseline case, application case and planned development case in their EIS to describe and address impacts at all stages of the project (construction, operation, decommissioning and reclamation)		
Baseline case The baseline case establishes and describes the conditions that exist prior to the development or if the project were not developed. Describe the environmental conditions that include the effects of existing land uses of the area.	**Application case** The application case describes the baseline case with the effects of the proposal added. Information is provided to allow regulators to determine how project operations should be controlled and how adverse effects can be mitigated and managed.	**Planned development case** The planned development case describes the environmental conditions of the project when integrated with the existing conditions and any other planned projects which can be reasonably expected to occur.

8.1.1. Environmental conditions and values

Describe the environmental conditions and identify the environmental values for the environmental themes identified in Table 1. This section should discuss the baseline conditions for the area.

8.1.2. Investigations

Identify the findings and results of any environmental investigation in relation to the land to which the proposal relates.

8.1.3. Impacts

Describe the effects of the environmental impact as a result of construction and operation for the environmental themes identified in Table 1 and in the proponent's risk assessment (including cumulative, consequential, and indirect effects) on physical and ecological systems and human communities. Particular emphasis should be placed on the potentially significant impacts identified in the risk assessment and this scoping document. Include a discussion of the timeframes of impacts i.e. short or long term, their nature and extent and whether they are reversible or irreversible, unknown or unpredictable. Include an analysis of the significance of the relevant impacts. Information must include any technical data and other information used or needed to make a detailed assessment of the relevant impacts.

8.1.4. Mitigation

Discuss the proposed safeguards and mitigation measures proposed to be taken for the environmental management of the land to which the proposal relates for the environmental themes identified in Table 1 and the proponent's risk assessment. This is to include:

a) A description and an assessment of the proposed impact prevention, mitigation or offsetting measures to deal with the environmental impact of the proposal, along with which stage the mitigation measures will be adopted

b) Any statutory or policy basis for the mitigation measures

c) An outline of an environmental management plan (EMP) that sets out the framework for continuing management, mitigation and monitoring programs for the relevant impacts of the action, including any provisions for independent environmental auditing

d) The frequency, duration and objectives of monitoring proposed

e) The name of the agency responsible for endorsing or approving each mitigation measure or monitoring program

f) A description of the cost effectiveness of environmental mitigation or rehabilitation measures proposed and the expected or predicted effectiveness of those measures.

8.1.5. Residual risk

Provide a table that details the residual risk for the potentially significant impacts identified for the environmental themes in Table 1 and the proponent's risk assessment. A residual risk assessment is only required where the significance of impact is determined as medium or above. The calculation of the residual risk should take into account the influence of implementation of mitigation or offsetting measures on the impacts identified by the risk assessment. A discussion of how the calculations were determined should also be included, including the expected or predicted effectiveness of the mitigation measures.

-Assessment Guide-				
Provide the residual risk assessment as set out in the table below.				
Risk identified in Section 7.1	**Original risk rating from items identified in 7.1**	**Residual likelihood**	**Residual consequence**	**Residual risk rating**

8.2. Detailed requirements

The following items (sections 8.2.1 - 8.2.14), relate to the potentially significant environmental impacts identified in Table 1. They must be addressed in detail in the EIS.

NOTE: The information provided under the following headings is not an exhaustive list of matters that may be required to accurately detail the assessment scenarios.

8.2.1. Planning and land status

- *Include a description of planning context of the area where the project will be located.*
- *Describe planning and development status of any land or project relevant to the proposal.*
- *Describe land use of the proposed land and any land to be affected (including, but not limited to, zoning, lessee(s) or custodian of the land, the permissibility of the proposed use defined in the Territory Plan).*
- *Investigate the impact the proposal will have on surrounding uses and whether the proposal will limit existing or future uses for the surrounding businesses/residences.*

8.2.2. Traffic and transport

- *Investigate the traffic impacts from construction and operation of the facility on Mugga Lane and the Monaro Highway, including consideration of whether continued safe and efficient movement of vehicles accessing the existing facility, or relating to other activities such as the Mugga Landfill or the proposed ACT FOGO waste facility, is not impeded by road network arrangements.*
- *Undertake a Transport Impact Assessment (TIA) in accordance with Transport Canberra and City Services (TCCS) Transport Impact Assessment Guidelines which is available at: https://www.cityservices.act.gov.au/__data/assets/pdf_file/0009/991989/TCCS-Transport-Impact-Assessment-Guidelines.pdf*
- *The TIA must include intersection analysis of the nearby roads.*
- *The TIA should also describe short-term parking arrangements for the existing facility whilst the new materials recovery facility is being constructed and long-term parking arrangements once the new facility is operational.*
- *Describe how hazardous materials will be transported to and from the site.*

8.2.3. Utilities and Infrastructure

- *Describe current utilities on and surrounding the site.*
- *Provide details of new connections and any proposed relocation or removal.*
- *Provide details of any proposed discharge of liquid trade waste required.*
- *Information must be provided regarding utility works that are required as part of the proposal and mitigation measures proposed to avoid contamination.*

8.2.4. Materials and Waste

- *Describe the nature, location, and quantities of all materials (including any hazardous wastes) to be handled on the site, including the assessment, storage, stockpiling, processing and disposal of materials and waste.*
- *Provide details of expected material and waste volumes, including residual waste to landfill.*
- *Outline management procedures in case of oversupply and/or stockpiling of materials and waste and any consideration of measures to be implemented when/if the facility ceases operation.*
- *Prepare an Operational Waste Management Plan in accordance with TCCS Waste Code.*
- *Describe any hazardous materials and dangerous chemicals to be used or stored on site during construction and operation.*
- *Identify any Schedule 11 hazardous chemical, as per Work Health and Safety Regulation 2011 (WHS Regulation).*
- *Provide details of maximum storage capacities for any hazardous chemicals.*
- *Provide safety data sheets for any hazardous chemicals.*
- *Identify whether any Schedule 11 hazardous chemicals meet the placard quantity as per the WHS Regulation.*
- *Describe how any potential hazardous materials will be transported to and from the site.*

8.2.5. Landscape and Visual

- *Undertake a visual assessment of the site and surrounds to describe the current landscape character of the area.*
- *Describe the predicted impacts the facility and its operations (such as incoming waste and material, potential stockpiling, artificial lighting) may have on the landscape character of the site and surrounds.*
- *Provide perspectives and/or a visual analysis of the proposal from local vantage points.*
- *Consider visual impact to the Monaro Highway and consistency with Development Control Plan 171/09/0001.*
- *Consider lighting impacts in relation to pilot distraction.*

8.2.6. Soils and Geology

- *Describe the soil and geology features of the area.*
- *Provide an environmental assessment of potential existing contamination from previous and adjacent land uses at the development site undertaken by a suitably qualified environmental consultant.*
- *Discuss any contamination impacts that are present at the site (soil and groundwater), and how the site will be remediated (if required).*
- *Describe the potential impacts of contaminant spills on the local soils.*

8.2.7. Water Quality and Hydrology

- *Describe the surface water and groundwater features of the area.*
- *Provide a description of likely annual wastewater volumes generated on site under maximum operational capacity.*
- *Provide a description about suitable sizing/treatment of the proposed bioretention pond system, to give confidence about the ability of the proposed bioretention pond system to manage volume and quality of wastewater under maximum operational capacity.*
- *Provie details of the existing dam and proposed bioretention pond, including height of the*

dam/pond wall from toe to crest in metres and volume of the dam/pond in ML.

- *Consider the potential for impacts associated with wastewater generation and any other on-site activity, on water quality, aquatic ecosystem and erosion within Dog Trap Creek (which flows to Jerrabomberra Creek and Lake Burley Griffin).*
- *Include mitigation measures to prevent potential water quality, aquatic ecosystem and erosion impacts to Dog Trap Creek and further downstream.*
- *Demonstrate compliance with the 'Waterways: Water Sensitive Urban Design General Code' made under the Territory Plan.*
- *Consider any feasible options to divert wastewater away from Dog Trap Creek.*
- *Describe the potential impacts of wastewater and contaminant spills on local groundwater and surface water.*
- *Describe how runoff from the development site will be treated before entering the receiving environment.*
- *Provide information on stormwater retention and reuse capabilities at the development site.*
- *Provide information on measures to manage wastewater/contaminants emanating from the facility to avoid impacts on groundwater and surface water.*

8.2.8. Biodiversity and Nature Conservation

- *Provide a description of ecological values on and adjacent to the site.*
- *Provide details of whether the proposal will impact the existing connectivity for the area and whether the site will contribute to the future connectivity of the area.*
- *Consider impact on the area from the facility attracting vermin and associated predators.*
- *Consider impacts from the spread of weeds.*
- *A targeted Striped legless lizard (SLL) survey must be undertaken for the site.*
- *Any impacts identified in the EIS must also consider avoidance and mitigation measures to ensure impacts are reduced.*

8.2.9. Socio-economic and Health

- *Provide maps and details showing potential impacts on surrounding sensitive receptors.*
- *Provide an assessment of impacts from the operation harbouring vermin and pest*
- *animals.*
- *Outline vermin and pest control measures encompassing both the transport and storage of materials and waste on site.*

8.2.10. Climate Change and Air Quality

- *Outline the greenhouse gas emissions that will be generated by the proposed development during construction and operation, including measures to mitigate the impact.*
- *Provide quantitative estimates of the Scope 1 and 2 greenhouse gas emissions that will be generated by the proposed development during operation.*
- *Outline how the proposal has assessed and responded to increased natural disaster risk being driven by climate change, particularly the extreme events of heatwaves, droughts, storms with flash flooding, and bushfires.*
- *Consider air quality impacts such as odour emissions and dust due to increased traffic movements and outline avoidance and mitigation measures to ensure any impacts are reduced.*

8.2.11. Noise and Vibration

- *Provide a noise and vibration impact assessment regarding the operation of the facility prepared in accordance with the "Guidelines for the preparation of Noise Management Plans for development applications Environment Protection Authority, March 2021".*

8.2.12. Hazard and Risk

- *Provide an assessment of the potential threat of fire occurring at the facility, such as risk in relation to fire in stockpiled material, any effect on the surrounding area that a fire may have, and the protection measures necessary to address the potential threat of fire.*
- *A bushfire assessment must be undertaken by a suitably qualified person.*
- *Consider how the development will limit the storage of flammable materials on-site during the bushfire danger period.*
- *A climate change risk assessment is required addressing the risk from increased events from flood, bushfire or extreme heat risk.*
- *Describe any hazardous materials and dangerous chemicals to be used or stored on site during construction and operation.*
- *Outline management procedures to be followed should critical infrastructure failure occur.*
- *Provide assessment and mitigation measures against the requirements of the "National Airport Safeguarding Framework (NASF)" and airport operations including "Guideline C Managing the Risk of Wildlife Strikes in the Vicinity of Airports" and "Guideline E Lighting and Pilot Distraction".*
- *Provide a Wildlife Management Program in accordance with the NASF Guidelines.*

8.2.13. Heritage

- *Include an expert assessment of the potential for Hume Site 1 to extend into the proposed development area, by a geomorphologist or other suitably qualified specialist.*
- *Include an expert assessment of the potential environmental impacts to Hume Site 1 arising from the proposal, such as but not limited to water quality, hydrology, erosion and vibration.*
- *Provide a Cultural Heritage Assessment (CHA) of the potential Aboriginal heritage impacts of the proposal.*
- *If testing or archaeological excavation is required to assess the extent of Hume Site 1, and/or to assess the Aboriginal heritage significance of the subject area, this investigation must be undertaken to inform the EIS.*
- *If the above assessment actions identify that the proposal may have detrimental heritage effects, all alternatives to heritage impacts must be considered and adopted where reasonably practicable. Where alternatives are not reasonably practicable, measures to minimise heritage impacts must also be considered and adopted.*
- *The EIS must redact information on some heritage places and objects as:*
    - *It is an offence under Section 55 of the Heritage Act 2004 to make information on Hume Site 1 publicly available; and*
    - *Information on Aboriginal places and objects is culturally sensitive, and should not be made public in accordance with Traditional Custodians views. It is also an offence under Section 55 of the Heritage Act 2004 to make information on some Aboriginal places at Hume publicly available.*

8.3 Entity requirements

The EIS must address the entities comments provided in **Attachment A**. If the issues raised by entities have been addressed in other sections of the EIS, this must be cross referenced.

9. Community and stakeholder consultation

The intention of the consultation in this scoping document is to ensure significant proposals include meaningful engagement with the community in the early stages of the project and provide clear expectations and an understanding of the actual development proposed. Consultation also provides an opportunity for the community to contribute to the design of the proposal and to resolve any major concerns early in the planning stages.

9.1. Consultation must be undertaken with:

- Lease holders and land managers of land potentially impacted by the proposal.
- Any recreational groups which may be affected by the proposal.
- Any volunteer conservation, landscape management or land care groups active in the area to be affected by the proposal, such as the Molonglo Conservation Group and the Isaacs Ridge Mount Mugga Mugga Park Care Group.
- Adjacent and nearby business owners and employees.
- The local community; and community groups, such as the Tuggeranong Community Council, the Jerrabomberra Residents Association and other community groups in the Southern Central Canberra area.

9.2. Provide a consultation report that includes:

- A description of the methodology and criteria for identifying stakeholders and how they were identified. Details and plans must be provided showing potential impacts on the local and wider community to justify how stakeholders were identified.
- An outline of the communication methods used. A variety of communication methods must be adopted to ensure all stakeholders are engaged appropriately, such as face to face, email/letters, community meetings and information sessions and website notifications.
- Details on the information provided during the community consultation process. Note: A plain English statement explaining the proposal and conceptual drawings must be made available to the community and stakeholders.
- A summary of the responses and the main comments raised. Evidence must be provided demonstrating that consultation has been undertaken with each relevant group/person including specific detail on how these concerns were addressed.
- A description on how any concerns have been considered and identify any changes that have been made to the proposal.

Consultation must occur as early as possible and avoid, or make allowances for public holidays, school holidays and the summer holiday (Christmas) shutdown period. The level of engagement must be comparable with the size, location and nature of the development and potential impact on the wider community.

9.3. Consideration of public representations from Draft EIS notification

The revised EIS must include a consultation report outlining the representations received, issues raised in the representations and a response to the issues and values identified. The summary response must clearly identify the representation(s) to which the responses relate.

10. Recommendations

Provide a summary of any commitments to impact prevention, mitigation measures, offsetting measures and other actions within the EIS.

Describe the monitoring parameters, monitoring points, frequency, data interpretation and reporting proposals.

11. Other relevant information

The proponent may wish to include issues outside the scope of the EIS as a separate section of the EIS. This allows the proponent to identify matters not required to be addressed in the EIS, but that would be subject to development assessment consideration and notification. This can provide additional context for members of the public regarding management of environmental issues, by ensuring that the public is aware that these issues will be addressed in the detailed design of the proposal.

12. References

A reference list using standard referencing systems must be included.

13. Required Appendices

13.1. Scoping document for the EIS

A copy of the scoping document should be included in the EIS. Where it is intended to bind appendices in a separate volume from the main body of the EIS, the scoping document should be bound with the main body of the EIS for ease of cross-referencing.

13.2. Scoping Document Reference

Include a table that cross-references the EIS to the scoping document. If the EIS addresses the scoping document in multiple places then this must be also referenced.

13.3. Proponent's Environmental History

Provide details of any proceedings under a Commonwealth or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against:

- The person proposing to take the action
- For an action for which a person has applied for a permit, the person making the application.

If the person proposing to take the action is a corporation, then provide details of the corporation's environmental policy and planning framework. Enough information is required to satisfy s136(4) of the EPBC Act.

13.4. Information Sources

For information given the following must be stated:

- The author or any reports or studies
- The publication date
- The source of the information
- How recent the information is (i.e. when a study was conducted or when primary sources were produced)

- How the reliability of the information was tested
- What uncertainties (if any) are in the information.

13.5. Study team

The qualifications and experience of the study team and specialist sub-consultants and expert reviewers must be provided.

13.6. Specialist studies

All reports generated based on specialist studies undertaken as part of the EIS are to be included as appendices.

13.7. Research

Any proposals for researching alternative environmental management strategies or for obtaining any further necessary information should be outlined in an appendix.

Attachment A

ENTITY REQUIREMENTS

Where not otherwise identified as a potentially significant impact, provide information in accordance with the requirements of the entities. If the issues raised by entities have been addressed in other sections of the EIS, this must be cross referenced in this section.

A1. ACT Emergency Services Agency

This proposal is located within the bushfire prone area. A bushfire risk assessment prepared by a qualified practitioner is required.

A2. ACT Health Protection Service

The HPS supports the implementation of standard mitigation measures, controls and studies in table 5.5 of the EIS scoping document. This includes controls to minimise pest harbourage, Soil contamination and for an air quality impact assessment to be conducted.

The applicant is advised that the design and construction of any Bioretention pond must minimise the potential for them to cause an insanitary condition (local mosquito nuisance) under the Public Health Act 1997. The applicant is advised to contact the HPS for further information.

A3. ACT Heritage Council

The Council does not support the heritage content of the scoping application, as set out in the 'Environmental Impact Statement Scoping Document' (GHD, March 2022); as it does not identify the presence of a significant palaeontological site, recorded as 'Hume Site 1', adjacent to the proposed development.

Hume Site 1 is registered on the ACT Heritage Register and is subject to Heritage Act 2004 provisions. Hume Site 1 is of high heritage significance and conservation value, and impacts to Hume Site 1 from construction or related changes in water quality, erosion and hydrology would be significant adverse impacts.

A recent assessment of Hume Site 1, by Navin Officer Heritage Consultants (in prep), has also identified that significant features of the place may extend beyond the registered boundary; and the potential for significant deposits to occur within Block 10 Section 25 Hume must be assessed by the EIS for the proposal.

The Council notes that it previously provided advice to Purdon Planning on 12 May 2020, who were assisting ACT No Waste on the subject proposal, of the presence of Hume Site 1 as a consideration for the proposal.

Information on Hume Site 1 has been declared as restricted and is not publicly available. However, this information can be provided by the Council to the applicant on request, following submission of a Section 57 application form, which is found online at: https://www.legislation.act.gov.au/af/2017-2/default.asp

Additionally, the Council advises that previous archaeological studies of landforms along Dog Trap Creek have found Aboriginal subsurface deposits of heritage significance and conservation value at a number of locations. Review of Council records indicates that parts of Blocks 6 and 10 Section 25 Hume were identified as a 'sensitive area' by Barber (2000), which was named 'PAD1' by Navin Officer Heritage Consultants (2001) and subsequently subject to

surface investigation by Australian Archaeological Survey Consultants (2003) with one subsurface Aboriginal object recovered.

Advice:

In this context, the Council identifies the following heritage assessment requirements required to inform the EIS for the proposed development:

1. *An expert assessment of the potential for Hume Site 1 to extend into the proposed development area, by a geomorphologist or other suitably qualified specialist.*
2. *An expert assessment of the potential environmental impacts to Hume Site 1 arising from the proposal, such as but not limited to water quality, hydrology, erosion and vibration.*
3. *A Cultural Heritage Assessment (CHA) of the potential Aboriginal heritage impacts of the proposal, which must:*

    a. *Be undertaken by a suitably qualified archaeologist;*
    b. *Be informed by consultation with Representative Aboriginal Organisations (RAOs) about: the cultural and heritage significance of any identified Aboriginal places and objects; the potential heritage impacts of proposed development; and proposed management outcomes;*
    c. *Meet the information requirements of the Council's Cultural Heritage Reporting policy, which is available at https://www.environment.act.gov.au/heritage/publications-and-resources; a. If the CHA identifies that proposed works will cause damage or diminish the significance of heritage places, recommendations must be presented to comply with Heritage Act 2004 provisions; and*
    d. *This CHA is to be submitted directly to the Council for review, and for advice on any additional Heritage Act 2004 requirements.*

4. *If testing or archaeological excavation is required to assess the extent of Hume Site 1, and/or to assess the Aboriginal heritage significance of the subject area, this investigation must be undertaken to inform the EIS. The investigation must include:*

    a. *Preparation of an Excavation Permit application by suitability qualified specialists, and including a Research Design and Methodology;*
    b. *Where the application relates to Aboriginal places and objects, consultation with RAOs regarding the proposed investigation, its methods and the management of any objects recovered;*
    c. *Submission of the application to the Council under Section 61E of the Heritage Act 2004; and*
    d. *Following approval of the application under Section 61F of the Heritage Act 2004, completion of the investigation in accordance with the conditions of that approval.*

5. *If the above assessment actions identify that the proposal may have detrimental heritage effects, all alternatives to heritage impacts must be considered and adopted where reasonably practicable. Where alternatives are not reasonably practicable, measures to minimise heritage impacts must also be considered and adopted.*

Note: *The EIS must redact information on some heritage places and objects, including in attached heritage reports, as:*

- *It is an offence under Section 55 of the Heritage Act 2004 to make information on Hume Site 1 publicly available; and*
- *Information on Aboriginal places and objects is culturally sensitive, and should not be made public in accordance with Traditional Custodians views. It is also an offence under Section 55 of the Heritage Act 2004 to make information on some Aboriginal places at Hume publicly available.*

The Council also advises that, if the above assessment demonstrates that the proposal would have a significant adverse impact on Hume Site 1, the proposed expansion of the Material Recycling Facility may not be suitable at this location; and may not be supported by the Council in the future.

The Council also notes that, in accordance with Heritage Act 2004 provisions, approval from the Council will be required where the proposal may diminish the heritage significance of Hume Site 1 or damage Aboriginal places and objects; in addition to any approvals required under the Planning and Development Act 2007.

Such approval is sought by making a Statement of Heritage Effect (SHE) application under Section 61G of the Heritage Act 2004, which are approved by the Council where it is satisfied on reasonable grounds that: the proposed activity is justifiable; and that there are no other reasonably practicable alternatives to heritage impacts; and that measures to minimise the heritage impacts of the proposal have been adopted.

A4. Canberra Airport

We acknowledge the application document references the NASF Guidelines, but there is no undertaking to have a Bird and Wildlife Assessment (Guideline C). We request this occurs and we are happy to provide contact details of preferred consultants if required. The site is just over 9km away from the airport and so it lies between the Area B and Area C of the NASF Guideline C, this details a Mitigate and Monitor action plan for dealing with birds and wildlife. A thorough investigation is required by the proponent.

We also request that Guideline E- lighting and pilot distraction be regarded to, we acknowledge that this would be addressed under the NCA Outdoor Lighting policy.

We would also require a copy of the environmental management documentation for our records and comment once the document is prepared.

A5. Conservator of Flora and Fauna

There are several concerns which have been identified and are required to be included in the Scoping Document and addressed in the EIS process. The specific items for inclusion are:

1. *Potential presence of Striped Legless Lizard (Delma impar)*
   As indicated in the scoping document the vegetation on this site is heavily degraded and unlikely to support threatened communities such as Natural Temperate Grassland or Box Gum Woodland. However, the vegetation structure and landscape position is still suitable for Striped Legless Lizard (SLL). A recent survey further down Dog Trap Creek located a population of SLL and this population has continuous

habitat linking it to the referral site. Therefore, a SLL survey should be undertaken in spring of 2022 to determine if the species is present on this site.

2. *Impacts associated with water quality and freshwater ecology*
   Consideration of potential impacts to water quality and aquatic habitat are required to be included in the EIS. The EIS should include:
   a. *A description of likely annual wastewater volumes generated on site under maximum operational capacity;*
   b. *A description about suitable sizing/treatment of the proposed bioretention pond system, to give confidence about the ability of the proposed bioretention pond system to manage volume and quality of wastewater under maximum operational capacity;*
   c. *The potential for impacts associated with wastewater generation and any other on-site activity, on water quality, aquatic ecosystem and erosion within Dog Trap Creek (which flows to Jerrabomberra Creek and Lake Burley Griffin);*
   d. *Mitigation measures to prevent potential water quality, aquatic ecosystem and erosion impacts to Dog Trap Creek and further downstream;*
   e. *Demonstration of compliance with the 'Waterways: Water Sensitive Urban Design General Code' made under the Territory Plan; and*
   f. *Consideration of any feasible options to divert wastewater away from Dog Trap Creek.*

3. *Bushfire management*
   While there are no concerns with the potential of the development to contribute to bushfire hazard for adjacent lands, it may be worthwhile for the EIS to consider how the development will limit the storage of flammable materials on-site during the bushfire danger period. Flammable recyclables including paper, cardboard and plastics may be impacted by fire and embers from fires off-site and if ignited will contribute significantly to the suppression effort required and to the potential spread of fire to other sites.

A6. Environment Protection Authority (EPA)

The Environment Protection Authority supports and recognises the importance of investment into waste management and recycling which is consistent with the objects of the Environment Protection Act, 1997 and provides the following advice on the documentation as circulated:

- *Section 4.1.5 of the scoping document does not reflect the contamination status of the block as recorded by the EPA. While contamination matters will be resolved through the DA process, the EIS should accurately reflect the contamination status.*
- *The document also does not sufficiently reference EPA requirements (including the requirement for an Environmental Authorisation) or EPA guidelines such as for the management of stockpiles etc. Similarly, it does not indicate the need for an Approval to Discharge Non-Domestic Liquid Trade Waste to Sewer.*
- *The EIS should refer to relevant EPA policies and guidelines for air, noise and odour emissions, discuss the management of materials stockpiled on the site, Environmental Protection Guidelines for Construction and Land Development in the ACT and demonstrate proposed measures and strategies to prevent impacts to the surrounding environment.*

- *Several environmental protection matters have been assessed as of low or very low significance in the EPA scoping document. However the EPA considers that these ratings may be understated, and that there may be potential for material environmental harm in the absence of controls being applied. They include potential impacts of odour and on the waterway described as a 'degraded' 'erosion gully'.*

The document could also outline how materials accepted at the site will be processed to ensure the highest order uses economically achievable.

A7. Environment, Planning and Sustainable Development Directorate

Sustainability Policy:
It is not clear from the information provided whether the proposed development will be a significant emitter of greenhouse gas emissions (e.g., methane). Climate Change and Energy Division recommends that the proponent is required to document likely sources of greenhouse gas emissions during operation and assess whether the proposed development has the potential to be a significant emitter. Note that construction emissions are not a concern.

If the proposal has the potential to be a significant emitter and may impact on the ACT's greenhouse gas emissions targets, the proponent will need to provide quantitative estimates of the Scope 1 and 2 greenhouse gas emissions that will be generated by the proposed development during operation. Mitigation and/or offsetting measures proposed and the extent to which they reduce emissions must also be quantified. Estimates must be calculated in a way that is comparable to the greenhouse gas emissions targets in the Climate Change and Greenhouse Gas Reduction Act 2010.

The Climate Change and Energy Division notes the proximity of the proposed development to the Mugga Lane Solar Park. The Division recommends the proponent is required to consider the potential impacts (e.g., dust) of the development on the solar facility.

If the proponent is assessing flood, bushfire or extreme heat risk, the Division advises that the impacts of climate change also need to be considered in the EIS, ideally through a climate change risk assessment. The Division encourages the use of NARClim regional downscaled climate projections for any reference to the ACT's future climate. More information can be found here: https://www.climatechange.environment.nsw.gov.au/climate-projections-used-adaptnsw?elqTrackId=f72f9814d12b4d16ba7df19f02bf31e5&elqaid=83&elqat=2.

Strategic Planning:
No comments.

A8. Icon Water

Development Services
Developer Services team has no comment on the EIS scoping Document. The block is currently being serviced by existing water and sewer tie. The developer should contact the team if they want to make changes to the location/size of water and sewer tie.

Liquid Trade Waste
All connections to sewer that are classified as Liquid Trade Waste (any non-domestic sewage) must apply to Icon Water's Liquid Trade Waste team for approval before connection to sewer.

Further information on acceptance requirements for liquid trade waste can be found on the Icon Water website www.iconwater.con.au\tradewaste .

In this circumstance at a minimum the Hume Materials Recovery Facility will need a current Icon Water Approval to discharge to sewer. If the works include a change to their processes, trade waste pre-treatment, the volume, or the chemical characteristics of the waste water they are discharging, a new trade waste application must be submitted. A consultation may be required to ascertain the likely discharge and discuss any pre-treatment requirements or if some waste must be collected for off-site disposal.

Environment
No comments.

A9. National Capital Authority

The NCA's requirements and interests have been adequately addressed in the Environmental Impact Statement Scoping Document. The proposal is not inconsistent with the National Capital Plan. The future development application must be consistent with Site Development Control Plan 171/09/0001.

The NCA has no additional comments or concerns.

A10. Queanbeyan-Palerang Regional Council

The lands adjoining the ACT border immediately adjacent to Hume was identified for residential uses under the Queanbeyan Residential and Economic Strategy 2031. The land known as 'South Tralee' as well as the land known as 'South Jerrabomberra' is zoned for residential purposes and is currently being developed as such. In addition, residential development exists at Jerrabomberra, which may also be impacted by the proposed development.

Accordingly, QPRC requests that any EIS recognise across border impacts and addresses the potential impacts of noise, odour as well as increased traffic on land identified for residential purposes in NSW as well as make recommendations on how these might be ameliorated.

QPRC would request to be consulted on the draft EIS, as well as on any subsequent development application for the site to further assess the likely impact of the proposed facility on land in NSW.

A11. Transport Canberra and City Services (TCCS)

TCCS supports the application.

A12. Utilities Technical Regulator (UTR)

UTR request the following information be obtained via the EIS:

- *Details of the existing dam / pond – height of the dam wall from toe to crest in metres and volume of the dam in ML.*
- *Details of the proposed dam / pond – height of the dam wall from toe to crest in metres and volume of the dam in ML.*

Details of the existing dam will be used to confirm that the dam should not be regulated

under the Utilities (Technical Regulation) Act 2014 and that Utilities Technical Regulation should not provide further advice on the decommissioning of the dam.

Details of the proposed dam can be used by UTR to determine if the dam is eligible for regulation under the Utilities (Technical Regulation) Act 2014. Should the dam reach the thresholds to be a registrable dam in Section 57 of the Act, further details of the dam will be required as detailed in Part 8 of the Act and the dam may require an Operating Certificate Under Part 6 of the Act and / or be subject to the Utilities (Technical Regulation) (ACT Dam Safety Code) Approval 2018.

A13. Evoenergy Electricity

No comments provided at this stage.

A14. Jemena

No comments provided at this stage.

Attachment B

GLOSSARY

Controlled Action (EPBC): An action defined under the EPBC Act, section 67.

Development application (DA): Application for development as defined under the PD Act.

Environment: As defined under the *Planning and Development Act 2007* (the PD Act), each of the following is part of the environment:

(a) the soil, atmosphere, water and other parts of the earth;

(b) organic and inorganic matter;

(c) living organisms;

(d) structures, and areas, that are manufactured or modified;

(e) ecosystems and parts of ecosystems, including people and communities;

(f) qualities and characteristics of areas that contribute to their biological diversity, ecological integrity, scientific value, heritage value and amenity;

(g) interactions and interdependencies within and between the things mentioned in paragraphs (a) to (f);

(h) social, aesthetic, cultural and economic characteristics that affect, or are affected by, the things mentioned in paragraphs (a) to (f).

Environmental Impact Statement (EIS): As defined under the PD Act.

EPBC Act: *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth)

Impact Track: An assessment track that applies to a development proposal defined under the PD Act, section 123.

Long term: Greater than 15 years duration.

Medium term: Greater than three (3) years to 15 years duration.

PD Act: *Planning and Development Act 2007* (ACT)

Regulated waste: waste defined under the *Environment Protection Act 1997*

Scoping: The process of identifying the matters that are to be addressed by an EIS in relation to the development proposal - see the PD Act, Section 212 (2).

Short term: Zero to three (3) years duration.

Socio-economic: Involving both social and economic factors.

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Appendix 2 – Cross reference table between EIS and the final scoping document

ACT MATERIALS RECOVERY FACILITY

APPENDIX B SCOPING DOCUMENT CHECKLIST

Prepared for Veolia Environmental Services (Australia) Pty Ltd | 2 April 2025

Introduction

This report is prepared as an Addendum to *Appendix B – Scoping Document Checklist* which provides a cross-reference to the requirements of the Scoping Document issued under Notifiable instrument NI2022–377 by the delegate of the ACT Planning and Land Authority on 5 August 2022.

The Scoping Document was issued to ACT NoWaste as the proponent for the proposed Materials Recovery Facility (MRF). GHD prepared a draft EIS for ACT NoWaste in 2023.

Since that time ACT NoWaste contracted Veolia to build and operate the MRF. GHD are not in a position to complete the EIS and as such, Veolia has engaged Element Environment to undertake this work.

Assessment

The requirements of the 2022 Scoping Document are repeated in Table 1.1 below, together with a cross reference to the Chapter within the EIS where the matter is addressed.

Table 1.1 Section of the EIS where Scoping Document is addressed

Scoping Document reference	Assessment requirements	Location in EIS
General requirements		
Cover Page	The cover page must clearly display the following: The name of the proposal (project title) The block identifier(s) and street address for the proposal The date of the preparation of the document Full name and postal address of the designated proponent Full name and postal address of the designated applicant Name and contact details of the person/organisation who prepared the documents (if different to the above)	Cover page
Glossary	Provide a glossary of technical terms, acronyms and abbreviations used in the EIS.	Glossary and abbreviations
Executive Summary	Provide a non-technical summary of the EIS including a description of the proposal, key findings and recommendations.	Executive summary
Introduction	Summarise the proposal background and justification for the proposal.	Chapter 1 and 2
Proposal Details		
5.1 Proposal Description	Provide a description of the proposal, including: a) The objectives and justification for the proposal; b) The location of the land to which the proposal relates, including detailed maps; c) The division and/or district names and block and/or section numbers of the land under the Districts Act 2002; d) If the land is leased – the lessee's name; e) If the land is unleased or public land – the custodian of the land; f) The purposes for which the land may be used; g) A clear identification of all lands subject to direct disturbance from the proposal and associated infrastructure and geomorphic features such as waterways and wetlands. This is to be supported by a map showing all affected lands; h) An outline of any developments that have been, or are being, undertaken by the proponent, or other person(s) or entities, within the proposal area and broadly in the region. Describe how the proposal relates to these developments;	Chapter 2

Scoping Document reference	Assessment requirements	Location in EIS
	i) A description of all the components of the proposal, including the proposal specifications, the predicted timescale for implementation (design, approvals, construction and decommissioning) and proposal life; j) A plan/description of the precise location of any works to be undertaken, structures to be built or elements of the proposal that may have relevant impacts; and k) A description of the construction methodologies for the proposal.	
5.2 Alternatives to the proposal	Provide details of any alternatives to the proposal considered in developing the proposal including a description of: a) Any alternatives to the proposal and provide reasons for selecting the preferred option with an analysis of site selection as an attachment to the EIS; b) The criteria used for assessing the performance of any alternative to the proposal considered; c) Any matters considered to avoid or reduce potential impacts prior to the selection of the preferred option; and d) Details of the consequences of not proceeding with the proposal.	Section 2.7
Legislative and Strategic Context	A description of the EIS process including any statutory approvals obtained or required for the proposal, and how the proposal is aligned with strategic priorities for the ACT.	Chapter 3
6.1 Statutory Requirements	The description must include information on statutory requirements for the preparation of an EIS: Planning and Development Act 2007 (including confirmation of relevant Schedule 4 triggers based on impacts identified in the scoping document and any studies undertaken in preparing the draft EIS) Planning and Development Regulation 2008 Waste Management and Resource Recovery Act 2016 Related statutory approvals	Section 3.2
6.2 Climate Change	The EIS must include information on how the proposal will reduce the risks from climate change impacts and include proposed adaptation measures to reduce vulnerability and increase resilience of the community and the Territory, particularly the extreme events of heatwaves, droughts, storms with flash flooding and bushfires. The information must address impacts on the local microclimate and how it will avoid contribution to urban heat and positively contribute to urban cooling measures. Additionally, the EIS must address the contribution the proposal will make to reducing greenhouse gas emissions and meeting the legislated target for a net zero emissions Territory (by 2045 at the latest). Preparation of the EIS must consider the relevant sections of ACT Government's following policies: ACT Climate Change Strategy 2019-2025 Canberra's Living Infrastructure Plan: Cooling the City	Section 3.3 and Chapter 16
6.3 Other requirements	The description must also include information on how each of the following has been considered in the preparation of the EIS and the development of the proposal: Territory Plan 2008 ACT Planning Strategy National Capital Plan Sustainability Policies Climate Change and Greenhouse Gas Reduction Act 2010 ACT Waste Management Strategy 2011-2025 Relevant environment protection policies and guidelines for air, noise, and odour emissions; the management of stockpiles; and the handling of non-domestic liquid trade waste Environmental Protection Guidelines for Construction and Land Development in the ACT	Section 3.3

Scoping Document reference	Assessment requirements	Location in EIS
	Contaminated Sites Environment Protection Policy 2017 Environment Protection Act 1997 Environmental Protection Regulation 2005 Heritage Act 2004 Nature Conservation Act 2014 Public Health Act 1997 Utilities (technical Regulation) Act 2014 Utilities (Technical Regulation) (ACT Dam Safety Code) Approval 2018 Plans of Management for any public land Any relevant Master Plan Other relevant planning and environmental guidelines and management plans	
6.3.1 Ecological sustainable development	Provide a description of how the proposed development demonstrates ESD. This is to include long-term and short-term considerations related to economic development, social development and environmental protection at local, regional and national scales. The proponent should ensure that the EIS adequately addresses the ESD principles as defined by section 9 of the PD Act.	Section 3.3.11
6.3.2 Territory Plan strategic directions	A statement must be provided regarding the proposal's compatibility with the principles in the Statement of Strategic Directions in the Territory Plan 2008 (Section 2.1 - Strategic Direction)	N/A. Not part of Territory Plan 2023
Risk Assessment		
7.1 Risk Assessment Methodology	Provide a risk assessment in accordance with the Australian and New Zealand Standard for risk management AS/NZS ISO 31000:2009 Risk management – Principles and guidelines. The proposed criteria for determining which risks are potentially significant impacts must be described. The PRA submitted as part of the request for a scoping document must be revised to include, but not be limited to, the risks identified by the Authority in Table 1. The risks identified in Table 1 are based on the scoping document application and comments received from entities on the application. All of these risks are considered potentially significant (i.e. a medium risk level or above), and must be addressed in the EIS. Should any risk levels change during the preparation of the EIS or any new risks become apparent, these must be assessed and included with a justification in the EIS, and where relevant, the residual risk assessment.	Chapter 4
Assessment of impacts		
	Sufficient information is required to provide the Authority with an adequate understanding of the environmental impacts associated with the proposal. Table 1 (scoping document) identifies the potentially significant risks considered by the Authority that must be addressed in the EIS. The risks and their associated risk levels were determined from the information submitted with the PRA, comments received from entities on the request for scoping document application and the Authority's risk assessment. Each potentially significant impact rated with a risk rating of medium and above as identified in the risk assessment must be addressed, and structured as outlined in the table below, with the information required by sections 8.3.1-8.3.13 of this scoping document.	Chapter 5 to Chapter 21
8.2 Detailed requirements	The following items (sections 8.2.1 - 8.2.14), relate to the potentially significant environmental impacts identified in Table 1. They must be addressed in detail in the EIS. NOTE: The information provided under the following headings is not an exhaustive list of matters that may be required to accurately detail the assessment scenarios.	As listed below
8.2.1 Planning	Include a description of planning context of the area where the project will be located.	Chapter 5

Scoping Document reference	Assessment requirements	Location in EIS
and land status	Describe planning and development status of any land or project relevant to the proposal. Describe land use of the proposed land and any land to be affected (including, but not limited to, zoning, lessee(s) or custodian of the land, the permissibility of the proposed use defined in the Territory Plan). Investigate the impact the proposal will have on surrounding uses and whether the proposal will limit existing or future uses for the surrounding businesses/residences.	
8.2.2 Traffic and transport	Investigate the traffic impacts from construction and operation of the facility on Mugga Lane and the Monaro Highway, including consideration of whether continued safe and efficient movement of vehicles accessing the existing facility, or relating to other activities such as the Mugga Landfill or the proposed ACT FOGO waste facility, is not impeded by road network arrangements. Undertake a Transport Impact Assessment (TIA) in accordance with Transport Canberra and City Services (TCCS) Transport Impact Assessment Guidelines which is available at: https://www.cityservices.act.gov.au/__data/assets/pdf_file/0009/991989/TCCS-Transport-Impact-Assessment-Guidelines.pdf The TIA must include intersection analysis of the nearby roads. The TIA should also describe short-term parking arrangements for the existing facility whilst the new materials recovery facility is being constructed and long-term parking arrangements once the new facility is operational.	Chapter 6
	Describe how hazardous materials will be transported to and from the site.	Chapter 18
8.2.3 Utilities and Infrastructure	Describe current utilities on and surrounding the site. Provide details of new connections and any proposed relocation or removal. Provide details of any proposed discharge of liquid trade waste required. Information must be provided regarding utility works that are required as part of the proposal and mitigation measures proposed to avoid contamination.	Chapter 7
8.2.4 Materials and waste	Describe the nature, location, and quantities of all materials (including any hazardous wastes) to be handled on the site, including the assessment, storage, stockpiling, processing and disposal of materials and waste. Provide details of expected material and waste volumes, including residual waste to landfill. Outline management procedures in case of oversupply and/or stockpiling of materials and waste and any consideration of measures to be implemented when/if the facility ceases operation.	Chapter 8
	Prepare an Operational Waste Management Plan in accordance with TCCS Waste Code.	Appendix E
	Describe any hazardous materials and dangerous chemicals to be used or stored on site during construction and operation. Identify any Schedule 11 hazardous chemical, as per Work Health and Safety Regulation 2011 (WHS Regulation). Provide details of maximum storage capacities for any hazardous chemicals. Provide safety data sheets for any hazardous chemicals. Identify whether any Schedule 11 hazardous chemicals meet the placard quantity as per the WHS Regulation. Describe how any potential hazardous materials will be transported to and from the site.	Chapter 18
8.2.5 Landscape and Visual	Undertake a visual assessment of the site and surrounds to describe the current landscape character of the area.	Chapter 9

Scoping Document reference	Assessment requirements	Location in EIS
	Describe the predicted impacts the facility and its operations (such as incoming waste and material, potential stockpiling, artificial lighting) may have on the landscape character of the site and surrounds. Provide perspectives and/or a visual analysis of the proposal from local vantage points. Consider visual impact to the Monaro Highway and consistency with Development Control Plan 171/09/0001. Consider lighting impacts in relation to pilot distraction.	
8.2.6 Soils and Geology	Describe the soil and geology features of the area. Provide an environmental assessment of potential existing contamination from previous and adjacent land uses at the development site undertaken by a suitably qualified environmental consultant. Discuss any contamination impacts that are present at the site (soil and groundwater), and how the site will be remediated (if required). Describe the potential impacts of contaminant spills on the local soils.	Chapter 10
8.2.7 Water Quality and Hydrology	Describe the surface water and groundwater features of the area. Provide a description of likely annual wastewater volumes generated on site under maximum operational capacity. Provide a description about suitable sizing/treatment of the proposed bioretention pond system, to give confidence about the ability of the proposed bioretention pond system to manage volume and quality of wastewater under maximum operational capacity. Provide details of the existing dam and proposed bioretention pond, including height of the dam/pond wall from toe to crest in metres and volume of the dam/pond in ML. Consider the potential for impacts associated with wastewater generation and any other on-site activity, on water quality, aquatic ecosystem and erosion within Dog Trap Creek (which flows to Jerrabomberra Creek and Lake Burley Griffin). Include mitigation measures to prevent potential water quality, aquatic ecosystem and erosion impacts to Dog Trap Creek and further downstream. Demonstrate compliance with the 'Waterways: Water Sensitive Urban Design General Code' made under the Territory Plan. Consider any feasible options to divert wastewater away from Dog Trap Creek. Describe the potential impacts of wastewater and contaminant spills on local groundwater and surface water. Describe how runoff from the development site will be treated before entering the receiving environment. Provide information on stormwater retention and reuse capabilities at the development site. Provide information on measures to manage wastewater/contaminants emanating from the facility to avoid impacts on groundwater and surface water.	Chapter 11
8.2.8 Biodiversity and Nature Conservation	Provide a description of ecological values on and adjacent to the site. Provide details of whether the proposal will impact the existing connectivity for the area and whether the site will contribute to the future connectivity of the area. Consider impact on the area from the facility attracting vermin and associated predators. Consider impacts from the spread of weeds. A targeted Striped legless lizard (SLL) survey must be undertaken for the site. Any impacts identified in the EIS must also consider avoidance and mitigation measures to ensure impacts are reduced.	Chapter 12
8.2.9 Socio-economic and Health	Provide maps and details showing potential impacts on surrounding sensitive receptors.	Chapter 13

Scoping Document reference	Assessment requirements	Location in EIS
	Provide an assessment of impacts from the operation harbouring vermin and pest animals. Outline vermin and pest control measures encompassing both the transport and storage of materials and waste on site.	
8.2.10 Climate Change and Air Quality	Consider air quality impacts such as odour emissions and dust due to increased traffic movements and outline avoidance and mitigation measures to ensure any impacts are reduced.	Chapter 14
	Outline the greenhouse gas emissions that will be generated by the proposed development during construction and operation, including measures to mitigate the impact. Provide quantitative estimates of the Scope 1 and 2 greenhouse gas emissions that will be generated by the proposed development during operation.	Chapter 15
	Outline how the proposal has assessed and responded to increased natural disaster risk being driven by climate change, particularly the extreme events of heatwaves, droughts, storms with flash flooding, and bushfires.	Chapter 16
8.2.11 Noise and Vibration	Provide a noise and vibration impact assessment regarding the operation of the facility prepared in accordance with the "Guidelines for the preparation of Noise Management Plans for development applications Environment Protection Authority, March 2021".	Chapter 17
8.2.12 Hazard and Risk	Provide an assessment of the potential threat of fire occurring at the facility, such as risk in relation to fire in stockpiled material, any effect on the surrounding area that a fire may have, and the protection measures necessary to address the potential threat of fire. A bushfire assessment must be undertaken by a suitably qualified person.	Chapter 18
	Consider how the development will limit the storage of flammable materials on-site during the bushfire danger period.	Chapter 19
	A climate change risk assessment (CCRA) is required addressing the risk from increased events from flood, bushfire or extreme heat risk.	Chapter 16
	Describe any hazardous materials and dangerous chemicals to be used or stored on site during construction and operation. Outline management procedures to be followed should critical infrastructure failure occur. Provide assessment and mitigation measures against the requirements of the "National Airport Safeguarding Framework (NASF)" and airport operations including "Guideline C Managing the Risk of Wildlife Strikes in the Vicinity of Airports" and "Guideline E Lighting and Pilot Distraction".	Chapter 18
	Provide a Wildlife Management Program in accordance with the NASF Guidelines.	Appendix L
8.2.13 Heritage	Include an expert assessment of the potential for Hume Site 1 to extend into the proposed development area, by a geomorphologist or other suitably qualified specialist. Include an expert assessment of the potential environmental impacts to Hume Site 1 arising from the proposal, such as but not limited to water quality, hydrology, erosion and vibration. Provide a Cultural Heritage Assessment (CHA) of the potential Aboriginal heritage impacts of the proposal. If testing or archaeological excavation is required to assess the extent of Hume Site 1, and/or to assess the Aboriginal heritage significance of the subject area, this investigation must be undertaken to inform the EIS. If the above assessment actions identify that the proposal may have detrimental heritage effects, all alternatives to heritage impacts must be considered and adopted where reasonably practicable. Where alternatives are not reasonably practicable, measures to minimise heritage impacts must also be considered and adopted. The EIS must redact information on some heritage places and objects as:	Chapter 20

Scoping Document reference	Assessment requirements	Location in EIS
	It is an offence under Section 55 of the Heritage Act 2004 to make information on Hume Site 1 publicly available; and Information on Aboriginal places and objects is culturally sensitive, and should not be made public in accordance with Traditional Custodians views. It is also an offence under Section 55 of the Heritage Act 2004 to make information on some Aboriginal places at Hume publicly available.	
Entity requirements		
8.3 Entity requirements	The EIS must address the entities comments provided in Attachment A. If the issues raised by entities have been addressed in other sections of the EIS, this must be cross referenced.	
8.3.1 ACT Emergency Services Agency	This proposal is located within the bushfire prone area. A bushfire risk assessment prepared by a qualified practitioner is required.	Chapter 19
8.3.2 ACT Health Protection Service	The Health Protection Service (HPS) supports the implementation of standard mitigation measures, controls and studies in table 5.5 of the EIS scoping document. This includes controls to minimise pest harbourage, Soil contamination and for an air quality impact assessment to be conducted. The applicant is advised that the design and construction of any Bioretention pond must minimise the potential for them to cause an insanitary condition (local mosquito nuisance) under the Public Health Act 1997. The applicant is advised to contact the HPS for further information.	Chapter 12
8.3.3 Heritage Council	Council does not support the heritage content of the scoping application, as set out in the 'Environmental Impact Statement Scoping Document' (GHD, March 2022); as it does not identify the presence of a significant paleontological site, recorded as 'Hume Site 1', adjacent to the proposed development. Hume Site 1 is registered on the ACT Heritage Register and is subject to Heritage Act 2004 provisions. Hume Site 1 is of high heritage significance and conservation value and impacts to Hume Site 1 from construction or related changes in water quality, erosion and hydrology would be significant adverse impacts. A recent assessment of Hume Site 1, by Navin Officer Heritage Consultants (in prep), has also identified that significant features of the place may extend beyond the registered boundary; and the potential for significant deposits to occur within Block 10 Section 25 Hume must be assessed by the EIS for the proposal. The Council notes that it previously provided advice to Purdon Planning on 12 May 2020, who were assisting ACT No Waste on the subject proposal, of the presence of Hume Site 1 as a consideration for the proposal. Information on Hume Site 1 has been declared as restricted and is not publicly available. However, this information can be provided by the Council to the applicant on request, following submission of a Section 57 application form, which is found online at: https://www.legislation.act.gov.au/af/2017-2/default.asp Additionally, the Council advises that previous archaeological studies of landforms along Dog Trap Creek have found Aboriginal subsurface deposits of heritage significance and conservation value at a number of locations. Review of Council records indicates that parts of Blocks 6 and 10 Section 25 Hume were identified as a 'sensitive area' by Barber (2000), which was named 'PAD1' by Navin Officer Heritage Consultants (2001) and subsequently subject to surface investigation by Australian Archaeological Survey Consultants (2003) with one subsurface Aboriginal object recovered.	Chapter 20
	Advice: In this context, the Council identifies the following heritage assessment requirements required to inform the EIS for the proposed development:	Chapter 20

Scoping Document reference	Assessment requirements	Location in EIS
	An expert assessment of the potential for Hume Site 1 to extend into the proposed development area, by a geomorphologist or other suitably qualified specialist. An expert assessment of the potential environmental impacts to Hume Site 1 arising from the proposal, such as but not limited to water quality, hydrology, erosion and vibration. A CHA of the potential Aboriginal heritage impacts of the proposal, which must: Be undertaken by a suitably qualified archaeologist; Be informed by consultation with Representative Aboriginal Organisations (RAOs) about: the cultural and heritage significance of any identified Aboriginal places and objects; the potential heritage impacts of proposed development; and proposed management outcomes; Meet the information requirements of the Council's Cultural Heritage Reporting policy, which is available at https://www.environment.act.gov.au/heritage/publications-and-resources; If the CHA identifies that proposed works will cause damage or diminish the significance of heritage places, recommendations must be presented to comply with Heritage Act 2004 provisions; and This CHA is to be submitted directly to the Council for review, and for advice on any additional Heritage Act 2004 requirements. If testing or archaeological excavation is required to assess the extent of Hume Site 1, and/or to assess the Aboriginal heritage significance of the subject area, this investigation must be undertaken to inform the EIS. The investigation must include: Preparation of an Excavation Permit application by suitability qualified specialists, and including a Research Design and Methodology; Where the application relates to Aboriginal places and objects, consultation with RAOs regarding the proposed investigation, its methods and the management of any objects recovered; Submission of the application to the Council under Section 61E of the Heritage Act 2004; and Following approval of the application under Section 61F of the Heritage Act 2004, completion of the investigation in accordance with the conditions of that approval. If the above assessment actions identify that the proposal may have detrimental heritage effects, all alternatives to heritage impacts must be considered and adopted where reasonably practicable. Where alternatives are not reasonably practicable, measures to minimise heritage impacts must also be considered and adopted. Note: The EIS must redact information on some heritage places and objects, including in attached heritage reports, as: It is an offence under Section 55 of the Heritage Act 2004 to make information on Hume Site 1 publicly available; and Information on Aboriginal places and objects is culturally sensitive and should not be made public in accordance with Traditional Custodian views. It is also an offence under Section 55 of the Heritage Act 2004 to make information on some Aboriginal places at Hume publicly available. The Council also advises that, if the above assessment demonstrates that the proposal would have a significant adverse impact on Hume Site 1, the proposed expansion of the Material Recycling Facility may not be suitable at this location; and may not be supported by the Council in the future. The Council also notes that, in accordance with Heritage Act 2004 provisions, approval from the Council will be required where the proposal may diminish the heritage significance of Hume Site 1 or damage Aboriginal places and objects; in addition to any approvals required under the Planning and Development Act 2007. Such approval is sought by making a Statement of Heritage Effect (SHE) application under Section 61G of the Heritage Act 2004, which are approved by the Council where it is satisfied on reasonable grounds that:	

Scoping Document reference	Assessment requirements	Location in EIS
	the proposed activity is justifiable; and that there are no other reasonably practicable alternatives to heritage impacts; and that measures to minimise the heritage impacts of the proposal have been adopted.	
8.3.4 Canberra Airport	We acknowledge the application document references the NASF Guidelines, but there is no undertaking to have a Bird and Wildlife Assessment (Guideline C). We request this occurs and we are happy to provide contact details of preferred consultants if required. The site is just over 9km away from the airport and so it lies between the Area B and Area C of the NASF Guideline C, this details a Mitigate and Monitor action plan for dealing with birds and wildlife. A thorough investigation is required by the proponent. We also request that Guideline E- lighting and pilot distraction be regarded to, we acknowledge that this would be addressed under the National Capital Authority (NCA) Outdoor Lighting policy. We would also require a copy of the environmental management documentation for our records and comment once the document is prepared.	Chapter 18
8.3.5 Conservator of Flora and Fauna	There are several concerns which have been identified and are required to be included in the Scoping Document and addressed in the EIS process. The specific items for inclusion are:	
	Potential presence of SLL (Delma impar) As indicated in the scoping document the vegetation on this site is heavily degraded and unlikely to support threatened communities such as Natural Temperate Grassland or Box Gum Woodland. However, the vegetation structure and landscape position is still suitable for SLL. A recent survey further down Dog Trap Creek located a population of SLL and this population has continuous habitat linking it to the referral site. Therefore, a SLL survey should be undertaken in spring of 2022 to determine if the species is present on this site.	Chapter 12
	Impacts associated with water quality and freshwater ecology. Consideration of potential impacts to water quality and aquatic habitat are required to be included in the EIS. The EIS should include: A description of likely annual wastewater volumes generated on site under maximum operational capacity; A description about suitable sizing/treatment of the proposed bioretention pond system, to give confidence about the ability of the proposed bioretention pond system to manage volume and quality of wastewater under maximum operational capacity; The potential for impacts associated with wastewater generation and any other on-site activity, on water quality, aquatic ecosystem and erosion within Dog Trap Creek (which flows to Jerrabomberra Creek and Lake Burley Griffin); Mitigation measures to prevent potential water quality, aquatic ecosystem and erosion impacts to Dog Trap Creek and further downstream; Demonstration of compliance with the 'Waterways: Water Sensitive Urban Design General Code' made under the Territory Plan; and Consideration of any feasible options to divert wastewater away from Dog Trap Creek.	Chapters 11 and 12
	Bushfire management While there are no concerns with the potential of the development to contribute to bushfire hazard for adjacent lands, it may be worthwhile for the EIS to consider how the development will limit the storage of flammable materials on-site during the bushfire danger period. flammable recyclables including paper, cardboard and plastics may be impacted by fire and embers from fires off-site and if ignited will contribute significantly to the suppression effort required and to the potential spread of fire to other sites.	Chapter 19

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Appendix 3 – Section 224 notice

Delete if not relevant

ACT Government
City and Environment

Trevor Fitzpatrick
Element Environment
Principal Planner
trevor@elementenvironment.com.au

Dear Mr Fitzpatrick,

Revised EIS-202200011 – ACT Materials Recovery Facility Environmental Impact Statement (EIS) – Chance to Address Unaddressed Matters – Section 224 Notice

I refer to the revised EIS submitted to the Territory Planning Authority (the Authority) on 14 May 2022.

The Authority has performed an assessment of the revised EIS in accordance with section 222 of the *Planning and Development Act 2007* (PD Act), as per the transitional arrangements under section 636 of the *Planning Act 2023.* The Authority is not satisfied that the EIS sufficiently addresses each matter raised in the scoping document for the proposal. As a result, the Authority does not accept the EIS and is providing a notice to this effect under section 224 of the PD Act.

You are required to provide further information as described in **Attachment A**. Comments from referral entities are described in **Attachment B**. You must respond to this notice by providing a revised EIS by 23 July 2026. If you do not respond within this time, the Authority must reject the EIS.

For your information, the Authority may provide up to two notices for a chance to address unaddressed matters. If the Authority remains unsatisfied after the two notices are responded to, the Authority must reject the EIS.

If you have any questions, please contact me on 6207 8728 or email EPDImpact@act.gov.au.

Yours sincerely,

Hayden Pini
A/g Senior Director, Impact Assessment
Statutory Planning Division
City and Environment Directorate
23 July 2025

Attachment A

This is a notice under section 224 of the *Planning and Development Act* (the Act) that Territory Planning Authority (the Authority) does not accept EIS-202200011 – ACT Material Recovery Facility under section 222 of the Act. The following further information is required to be addressed in a Revised EIS.

Please note: Entity comments are included at **Attachment B** and must also be addressed in the Revised EIS.

Ecologically Sustainable Development (ESD)

In accordance with section 6.3.1 of the Scoping Document, the description at section 3.3.12 of the revised EIS - which details how the proposed development demonstrates ESD, must provide clearer differentiation between long-term and short-term considerations related to economic development, social development and environmental protection at local, regional, and national scales.

Water Quality and Hydrology

In accordance with section 8.2.7, item 11 of the Scoping Document, further information is required to demonstrate how stormwater will be retained and reused at the development site, consistent with the advice received from the Conservator of Flora and Fauna (the Conservator).

In accordance with section 8.2.7, item 6 of the scoping document, further information is required to demonstrate that the stormwater discharge point will be designed to ensure that there will be no erosion impacts downstream of the discharge point.

Biodiversity and Nature Conservation

Section 8.2.8, Item 2 of the Scoping Document requested that the EIS "*Provide details of whether the proposal will impact the existing connectivity for the area and whether the site will contribute to the future connectivity of the area*". The revised EIS only mentions the loss of connectivity for birds and it does not consider the loss of connectivity for grassland fauna.

In accordance with the advice received from the Conservator, greater analysis of this impact is required, along with more details on how the facility could improve connectivity for the future. The Conservator has noted that development will retain a strip of grassland parallel to Dog Trap creek as well as a large farm dam. Commitment to improved management of these areas could contribute to improved ecological function of the Dog Trap Creek riparian area.

Climate Change and Air Quality

Advice from Climate Change within the City and Environment Directorate states that greenhouse gas mitigation and abatement measures have not been fully considered nor documented in the EIS. Measures should include, but not be limited to, adhering to the ACT low carbon concrete policy, looking at alternate options for diesel use which could include electric options wherever possible, and seeking an independent sustainability rating or equivalent.

In accordance with section 8.2.10, Item 1 of the Scoping Document, further consideration should be given to measures to mitigate greenhouse gas emissions that will be generated by the proposed development during construction and operation and any opportunities to reduce emissions, such as those suggested above.

Hazard and Risk

Bushfire:

The revised Bushfire Assessment Report has considered the proposal as a building of class 5-8 in the Bushfire Management Standards. However, advice from the ESA states that the nature of the facility is consistent with section 8.3.7 – "Hazardous Industry" and consideration of increased protection measures such as asset protection zone (APZ) may be applied. The advice also notes that because the proposal relates to redevelopment of an existing site, there is an opportunity to consider the existing APZ arrangement that is applied to the precinct.

In accordance with section 8.2.12, Item 1 of the Scoping Document, please provide further consideration to the protection measures necessary to address the potential threat of fire and whether the proposed APZ is appropriate for the development type.

Flood risk:

Advice from ACT State Emergency Services states that they are unable to provide an assessment as no flood study/mapping is available. However, the Authority notes that flood mapping is included at Appendix K of the revised EIS. For ease of reference, it is requested that the body of the EIS be updated to incorporate the flood mapping (in addition to Appendix K).

Heritage

In accordance with the advice received from the ACT Heritage Council, restricted heritage information is not to be included in any documents, reports or plans to be placed on public exhibition for the Development Application or any other associated planning process.

Please provide redacted versions of documents that contain any restricted heritage information for public exhibition purposes, noting that the final EIS will be placed on the planning.act.gov.au webpage.

ACT Government
Environment, Planning and Sustainable Development

Mr George Cilliers
Chief Planner
Territory Planning Authority
epdimpact@act.gov.au

Dear Mr Cilliers

CONSERVATOR COMMENT- REVISED EIS – Hume Materials Recovery Facility Upgrades – EIS 202200011

Thank you for the opportunity to provide comment on the revised Environmental Impact Statement (EIS) for the proposed development of a new Materials Recovery Facility (MRF) on Block 12, Section 25 Hume, Recycling Road.

I have reviewed the revised EIS with particular consideration to the comments provided during the Draft EIS process. The Revised EIS has now addressed the majority of my previous feedback.

However I would like to request further consideration and improvement of site ecological connectivity, as well as consideration of stormwater flow and infrastructure design, as detailed in Attachment A.

The contact officer within my office for matters described in this letter is Ms Karen Taylor, A/g Conservator Liaison on telephone 620 54668 or by email at ConservatorFloraFauna@act.gov.au.

Yours sincerely

Bren Burkevics
Conservator of Flora and Fauna

19 June 2025

1. The Revised EIS does not fully address the issue of connectivity. The scoping document requested that the EIS "*Provide details of whether the proposal will impact the existing connectivity for the area and whether the site will contribute to the future connectivity of the area*". The EIS only mentions the loss of connectivity for birds and it does not consider the loss of connectivity for grassland fauna.

   More analysis of this impact is required, along with more details on how the facility could improve connectivity for the future. The development will retain a strip of grassland parallel to Dog Trap creek as well as a large farm dam. Commitment to improved management of these areas could contribute to improved ecological function of the Dog Trap Creek riparian area.

2. The proponent should look to maximise stormwater retention on-site for re-use. This would have multiple benefits including reduced potable water demand and reducing stormwater discharge to the receiving environment.

3. The stormwater discharge point needs to be designed to ensure that no erosion occurs downstream of the discharge point. Demonstration of this should be a requirement of the Development Application submission.

ACT Heritage Council

HERITAGE ADVICE

Environmental Impact Statement

ACTPLA Reference:	EIS202200011
Heritage Reference:	Hume-S25-B12
Contact Officer:	JM
Received by Council:	26 May 2025
Due date:	19 June 2025

TO: **Territory Planning Authority**
Environment, Planning and Sustainable Development Directorate
EPDImpact@act.gov.au

Block:	Section:	Division / District:	Heritage Place:
12	25	Hume	Adjacent to Hume Site 1

Status of Place: Adjacent to Registered Heritage Place

Description of Works: Materials Recovery Facility

Council Advice provided by: Director (Approvals and Advice)

Pursuant to Part 8 of the *Planning and Development Act 2007* and Section 60 of the *Heritage Act 2004*, the ACT Heritage Council advises that:

☒ The Revised Environmental Impact Statement has adequately addressed the requirements of the Scoping Document.

☒ The Revised Environmental Impact Statement does adequately describe the anticipated heritage impacts of the development, and how these will be avoided, minimised and mitigated.

Background:

On 26 May 2025, the Territory Planning Authority referred the Revised Environmental Impact Statement (EIS202200011) to the ACT Heritage Council (the Council) for entity advice. EIS202200011 relates to a proposal to develop a new Materials Recovery Facility (MRF) in Block 12 Section 25 Hume.

The Council issued EIS scoping advice on 30 June 2022 on heritage assessment requirements, relating to Hume Site 1 and Aboriginal heritage, and these requirements were incorporated into the Scoping Document.

The Council provided advice endorsing the Draft EIS202200011 on 16 October 2023, subject to additional conditions in relation to heritage mitigation and managements measures.

Since providing that advice, the Council was made aware by the Office of Water that the reports relating to the water impact assessment required amendments. Noting this information, it was considered that the development and operation of the MRF may lead to impact to Hume Site 1 from associated stormwater management.

Accordingly, further Council advice was issued to various parties outside of the formal EIS process on 8 May, 9 August and 13 December 2024, requesting further information to determine if the proposal would impact Hume Site 1. Part of this information is included in *"Materials Recovery Facility, Hume, ACT – Additional Works, Addendum to Cultural*

Heritage Assessment" (Navin Officer Heritage Consultants 2025) provided with the EIS202200011 referral. The Revised EIS202200011 also includes a larger project footprint which is assessed in an Addendum CHA included in the referral (Navin Officer Heritage Consultants, 2025).

Review of this information, along with comment from the Office of Water, indicates that the proposed MRF will not pose an increased risk to Hume Site 1 and is therefore unlikely to diminish its heritage significance. This assessment is noted with the limitation that all models in the "*Water Impact Assessment: Proposed Hume Materials Recovery Facility*" (Martens 2025) are assumed to be correct.

Advice:

Noting the above, and as a Council delegate, I advise that the Revised EIS202200011 has adequately addressed the requirements of the Scoping Document, and adequately describes the heritage impacts of the development, and how these will be avoided, minimised and mitigated.

Accordingly, the Revised EIS is endorsed in relation to heritage mitigation and managements measures, subject to the following conditions:

1. Disturbance associated with the new MRF is to be contained to the mapped 'Updated Impact Area' as per Figure 2 in the Addendum CHA. If disturbance beyond this boundary is proposed, further advice must be sought from the Council;

2. Any Return to Country outcome for the Aboriginal objects recovered from HMRF01 must be developed within 2 years of the date of this advice, which is an extended timeframe from prior advice;

3. The Unanticipated Discovery Protocols outlined in Appendix 1 of the *"Materials Recovery Facility, Hume, ACT – Additional Works, Addendum to Cultural Heritage Assessment"* (Navin Officer Heritage Consultants 2025) must be adhered to for the duration of ground disturbing works associated with the project, and be incorporated into the project's Construction Environment Management Plan (CEMP) (where applicable);

4. Restricted heritage information is not to be included in any documents, reports or plans to be placed on public exhibition for the Development Application or any other associated planning process; and

5. Vegetation, or other associated visual impact mitigation measures must not cause damage to an Aboriginal place or object, or diminish the significance of a registered heritage place or object. Further advice will be required from the Council should any screening be proposed in the curtilage of a registered heritage place, and/or should any screening be proposed outside the 'Updated Impact Area' as per Figure 2 in the Addendum CHA.

The Council will also provide advice on subsequent development applications, and any other relevant referrals in relation to this project.

Meaghan Russell
Director (Approvals and Advice) (as delegate for),
ACT Heritage Council

18 June 2025

ACT Emergency Services Agency
Development Application Review

ACTESA | 9 Amberley Avenue | Fairbairn Business Park | Majura ACT 2609

DEVELOPMENT APPLICATION NO: REVISED EIS 202200011

DATE RECEIVED: 26 May 2025

BLOCKS: 12	SECTION: 25	DIVISION:

DESCRIPTION OF THE PROPOSAL: Revised EIS for ACT Materials Recovery Facility - HUME

COMMENTS PROVIDED FROM:

ACTF&R ☒ **ACTRFS** ☐ **ACTSES** ☐ **ACTAS** ☐

ACT Emergency Services Agency's (ACTESA) position on the Development Application is:	
That the proposal is supported	X
That the proposal is supported with conditions	
That the proposal is not supported	
That further information is required for assessment	

ACTF&R Advice

ACT Fire & Rescue (ACTF&R) has assessed the proposal regarding the following:

Criteria	Assessed	Not Applicable
Fire Station Response Area	X	
Water Supply	X	
Fire Brigade Access	X	
Bushfire Protection Requirements	X	
Hazardous Materials	X	
Street Furniture, Landscaping and Tree Planting		X
Building Fire Safety Systems		X

ACTF&R Advice

1. Fire Station Response Area:

The proposed development's location indicates that ACTF&R will be able to respond operationally to the area and its surroundings.

2. Water Supplies:

Fire Risk Type (FRT) is designated based on land use zones aligned with the ACT Territory Plan 2023 and a risk-based assessment considering building classification, occupancy, building size, and other factors that may demand specific water flow and hydrant spacing requirements.
Based on the above, the subject site has been assessed as FRT5, requiring a minimum firefighting flow provision of 150 l/s.

The proponents must seek clarification from ICON Water to determine the adequacy of existing infrastructure, including hydrant spacing, for the proposed development.

3. ACT Fire and Rescue Access:

All roads and driveways on the development site must be suitably constructed to allow access and egress for firefighting vehicles, crews, and equipment.
Paths of travel that traverse or are close to basement surfaces or water retention pits require pavement loading suitable for ACTF&R Pumper/Specialist Vehicles access/egress.

CAFS

ACTF&R Compressed Air Foam System (CAFS) 8000 fire appliances are designed for fires on the urban interface; however, they can also be used as multi-functional vehicles. CAFS provides asset protection from bushfire sources along the urban interface. Therefore, the development's internal and perimeter roads need to be designed to allow access to these vehicles.

The advice below provides specifications of the Volvo FM9 CAFS 8000, the largest of the two vehicles.

Compressed Air Foam System Appliance

- Length: 10.5m
- Width: 3.2m (with mirrors)
- Height: 3.7m
- Weight: 23 tonnes
- Turning circle: 21.2m

All emergency access gates are to be fitted with standard Fire Brigade locks.

4. Bushfire Protection Requirements:

Bushfire Threat Assessment and Compliance Report:
This development is inside the area designated by the ESA to be subject to the threat of bushfires. Appropriate bushfire protection measures are advised, and an assessment of the proposal by an accredited Bushfire Consultant is required as part of a development application.

The revised Bushfire Assessment Report provided is broadly supported with regard to consideration as a building of class 5-8 in the Bushfire Management Standards. However, the nature of the facility is consistent with section 8.3.7 – "Hazardous Industry" and consideration of increased protection measures such as APZ may be applied. As redevelopment of an existing site there is an opportunity to consider the existing APZ arrangement that is applied to the precinct.
ACTF&R look forward to providing further commentary and advice with detailed design at Development Application. Specific consideration will be given to the ACT Bushfire Management Standards and NSW Fire Safety Guideline – Fire Safety In Waste Facilities

5. Information:

Please email actfr.riskplanning@act.gov.au for further information regarding these comments.

……
Matt Shonk
A/g Chief Officer,
ACT Fire & Rescue
12. 06. 2025

7 November 2023

Level 4, 21 Terminal Avenue
Plaza Offices - West
Canberra Airport ACT 2609
Phone: 02 6275 2222
www.canberraairport.com.au

EPD Customer Services
Environment, Planning and Sustainable Development Directorate
GPO Box 158
CIVIC ACT 2601

By email: ACEPDCustomerServices@act.gov.au

Dear EPD Customer Services,

RE: CANBERRA AIRPORT SUBMISSION ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS-202200011) FOR THE MATERIALS RECOVERY FACILITY, AT BLOCKS 6 & 10 SECTION 25 HUME ACT

Thank you for the opportunity to comment on the Draft EIS (EIS202200011) for the proposed Materials Recovery Facility, Blocks 6 & 10 Section 25 Hume.

Our concerns are focussed on the safe and efficient operation of aircraft arriving and departing from Canberra Airport which is located approximately 10 kilometres away.

Following a review of the documents available on your website in regard to the Draft EIS, Canberra Airport notes that the MRF building will be fully enclosed and that, most importantly, there will be no open waste stored outside the MRF building unless it is containerised in waterproof shipping containers: thereby negating the risk of attracting more birds in the area.

On this basis, Canberra Airport has no objection to the proposal. We look forward to reviewing the Development Application when lodged to be reassured that bird attraction risk is appropriately mitigated when the MRF is operational.

Should EPSDD Impact Assessment have any questions regarding the submission please contact the Canberra Airports Planning Team via email planning@canberraairport.com.au or phone on 02 6275 2207.

Your sincerely,

Michael Lee

Planning and Environment Officer

ACT Health

The Health Protection Service (HPS) notes that ACT NoWaste has selected Veolia Environmental Services (Australia) Pty Ltd as the nominated proponent for this development is proposing to upgrade the existing Hume MRF to better separate and process recycling streams such as paper, glass and plastic.

The HPS has reviewed the revised EIS documents and notes that previous HPS comments provided to the draft EIS have been addressed.

There are no further public health concerns in relation to the Revised EIS.

ACT State Emergency Services

ACTSES has reviewed the subject DA and are unable to provide an assessment as no flood study/mapping is available. Flood mapping should be available through EPSDD and/or SLA and should be sourced from them.

Climate Change, City and Environment Directorate

We have reviewed the greenhouse gas emissions calculations included in the reviewed EIS. We deem that the revised EIS is satisfactory and meets the requirement and provides quantitative estimates of the Scope 1 and 2 greenhouse gas emissions that will be generated by the proposed development during operation.

Advisory note: As a government funded project, the project should be taking leadership in undertaking greenhouse gas mitigation and abatement measures. These have not been fully considered nor documented in the EIS. Measures should include, but not be limited to, adhering to the ACT low carbon concrete policy, looking at alternate options for diesel use which could include electric options wherever possible, and seeking an independent sustainability rating or equivalent.

For further information on greenhouse gas emissions calculations and mitigation measures such as the low carbon concrete policy, please contact climatechange@act.gov.au.

Environment Protection Authority (EPA)

Thank you for the opportunity to review and provide comments on the environmental significance opinion (ESO) application for 202200011-Materials Recovery Facility Hume ACT - 12/25 Hume.

The Office of the Environment Protection Authority (EPA) supports the revised EIS and provides the following comments:

- The targeted site investigation referenced in the EIS must be submitted to EPA for review and endorsement prior to the commencement of the proposed development.

- In accordance with the Environment Protection Act 1997, an Environmental Authorisation must be obtained to operate a waste transfer station that receives 30,000 tonnes or more of waste annually.

ICON Water

In recent discussions with the proponent on the updated MRF proposal contained within the revised EIS, wastewater network capacity and sewage quality constraints were identified from the proposed wastewater discharges relating to the glass washing component of the proposal. The quantity and quality of wastewater discharge proposed from the glass washing component is not currently able to be accepted into the wastewater network.

Icon Water's assessment of the wastewater discharge issues is based on the updated information provided by the proponent at the end of 2024 and early 2025 that has been developed from more advanced design work than what was available in the draft 2023 EIS for the proposal.

Whilst the revised EIS does not propose construction of the glass washing facility in the initial phases, Icon Water notes it remains a potential "value add" that has been allowed for within the design, to future proof operations of the MRF. Icon Water is supportive of this approach and further investigative work around potential options, including both onsite management of waste and upgrades to Icon Water assets that may allow future inclusion of the glass washing function.

Icon Water has existing processes that define the requirements for the design, acceptance and connection of new assets and developments to Icon Water's networks, including the Service and Installation Rules and the Asset Creation and Acceptance processes. These processes will need to be followed by the proponent and will ensure that Icon Water's requirements are met as the proposal progresses into and through the development application (DA) process.

Icon Water notes the proponent's responses to Icon Water's comments on the draft EIS and that the proponent will provide more detailed information on the specific issues raised when it becomes available. Any changes that are made to the proposal through these subsequent steps may require Icon Water to reassess the impacts and requirements of the proposal.

Jemena Gas

Jemena has reviewed the location of the Development Application and undertaken a review of the documentation provided. Please note this must comply with the ACT Government regulations & Development/Building Approvals https://www.legislation.act.gov.au/View/a/2010-41/current/html/2010-41.html.

Jemena has no objection to this development application if it meets these requirements. It is noted that there is a gas network in the vicinity however, all care is to be taken around our underground assets & please ensure appropriate Before You Dig Australia (BYDA) processes are followed as part of the construction process.

National Capital Authority (NCA)

Thank you for the referral for EIS 202200011, Hume Materials Recovery Facility at Block 12 Section 25 Hume. The NCA's requirements and interests from the scoping document have been adequately addressed in the revised Environmental Impact Statement. The NCA has no additional comments for the EIS.

Transport Canberra and City Services (TCCS)

It is understood all access to and from the site is proposed via Recycling Road. A separate verge crossing is proposed for the carpark to separate conflict between passenger and heavy vehicles.

Compared to the previous assessment, traffic generation and subsequent impacts are similar, as per the statement provided by Element Environment, dated 2 April 2025.

As per the Executive Summary of the EIS, prepared by Element Environment dated 13 May 2025, parking is to be provided on-site as per ACT Industrial Zones requirements.

Therefore, TCCS have no further comments and the revised EIS proposal can be supported.

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Appendix 4 – Proponent response to Section 224 notice

Only include this appendix if a Section 224 notice is issued

#	Subject	Agency Issue (from S224 Notice)
1	ESD	The description at section 3.3.12 of the revised EIS must provide clearer differentiation between long-term and short-term considerations related to economic development, social development and environmental protection at local, regional, and national scales.
2	Water Quality and Hydrology	Further information is required to demonstrate how stormwater will be retained and reused at the development site, consistent with the advice received from the Conservator of Flora and Fauna (the Conservator).
3		Further information is required to demonstrate that the stormwater discharge point will be designed to ensure that there will be no erosion impacts downstream of the discharge point.
4	Biodiversity and Nature Conservation	The revised EIS only mentions the loss of connectivity for birds and it does not consider the loss of connectivity for grassland fauna.
5		Commitment to improved management of the strip of grassland parallel to Dog Trap creek as well as a large farm dam could contribute to improved ecological function of the Dog Trap Creek riparian area.
6	Climate Change and Air Quality	Greenhouse gas mitigation and abatement measures have not been fully considered nor documented in the EIS. Measures should include, but not be limited to, adhering to the ACT low carbon concrete policy, looking at alternate options for diesel use which could include electric options wherever possible, and seeking an independent sustainability rating or equivalent

7		Further consideration should be given to measures to mitigate greenhouse gas emissions that will be generated by the proposed development during construction and operation and any opportunities to reduce emissions, such as those suggested above.
8	Bushfire:	The revised Bushfire Assessment Report has considered the proposal as a building of class 5-8 in the Bushfire Management Standards. However, advice from the ESA states that the nature of the facility is consistent with section 8.3.7 – “Hazardous Industry” and consideration of increased protection measures such as asset protection zone (APZ) may be applied.
9		The advice also notes that because the proposal relates to redevelopment of an existing site, there is an opportunity to consider the existing APZ arrangement that is applied to the precinct.
10		Please provide further consideration to the protection measures necessary to address the potential threat of fire and whether the proposed APZ is appropriate for the development type
11	Flood risk:	For ease of reference, it is requested that the body of the EIS be updated to incorporate the flood mapping (in addition to Appendix K).

12	Heritage	Restricted heritage information is not to be included in any documents, reports or plans to be placed on public exhibition for the Development Application or any other associated planning process.
13		Please provide redacted versions of documents that contain any restricted heritage information for public exhibition purposes, noting that the final EIS will be placed on the planning.act.gov.au webpage.

Response
Section 3.3.12 has been updated to include details on short-term and longer-term benefits and their local or national scale. Refer pages 50-52.
Further water impact assessment maximises stormwater retention on-site for re-use and ensuring that no erosion occurs downstream of the discharge point. The key components of the revised stormwater detention, retention and treatment system include: * 450 kL of on-site detention within three (3) 150kL tanks equating to detention capacity of 1 kL per 100m2 of total impervious area on-site * 408 kL stormwater retention tanks equating to retention capacity of 1.4 kL per 100m2 of total impervious area * Ecoceptor stormwater quality improvement device to be installed downstream of the on-site detention tanks to capture gross pollutants, nitrates, phosphates and suspended solids * Peak flow rate from the site post development will be less than the peak flow rate from the site pre-development * The on-site detention system will discharge into the existing 525 mm stormwater main in Recycling Road via a new manhole Refer to Section 11.3.6 on page 164 for details.
No erosion occurs at or downstream of the stormwater discharge point as all stormwater runoff from the impervious areas of the site drain towards and are captured in the on-site detention tanks and no stormwater drains offsite via overland flow. The stormwater discharge point is into the existing 525 mm stormwater main in Recycling Road via a new manhole.
Capital Ecology undertook further assessment, to identify opportunities to enhance habitat connectivity and (in conjunctions with the Conservator) recommended: * Fencing off a 30m wide corridor of approximately 0.96 hectares along the northern boundary of the site including the area around the dam. * Implement a weed control program to remove Blackberry and other significant weeds, with ongoing maintenance to prevent reinvasion. * Planting the fenced area with a mix of native grasses, rushes, sedges and forbs to provide connectivity between the existing plantings along Mugga Lane, the dead tree and the dam, * Placement of rocks and coarse woody debris in suitable locations within the fenced native planting area to provide additional fauna habitat. Refer to Section 12.4.1 on page 180 for details.
Commitment by Veolia to implement the above recommendations will result in improved management of the strip contibuting to improved ecological function of the riparian area. The above measures have been included in the Mitigation table 12.2 as well as the table in the Executive Summary and table 22.1
The EIS has been revised to include additional measures to be considered including low carbon concrete policy , alternatives to diesel use and electric options. Proposed measures are summarised below in incuded in section 15.4, page 216. The facility will be designed to be consistent with 4-star Green Star Building v1.1. (Design and As-Built) from the Green Building Council of Australia.

The facility design considers a range of measures to reduce GHG emissions including but not limited to: Design and construction of the MRF Facility to achieve an equivalent of GreenStar 4-Star rating. Reduction of operation emissions by provision of:
* A substantial portion of the power from rooftop solar. Veolia is also investigating location of a Battery Energy Storage System on site.
* Use of Variable Speed Drives (VSDs) for process equipment shall reduce energy demand.
* Digital project management tools: Reduce paper use and improve coordination, cutting down on rework and delays.
* Just-in-time material delivery: Reduces storage needs and energy used in handling.
* Provision of electric vehicle ready charging infrastructure Encourage staff to transition to electric or hybrid vehicles for personal use. When purchasing vehicles for our fleet, consider purchasing an electric or hybrid vehicle.
* Installation of transparent roof sheeting to reduce lighting consumption
* Undertake periodic reviews during the operational lifetime of technologies and abatement measures to reduce GHG emissions from the proposal (e.g. robotics and AI)
* Elimination of gas driven technologies for glass processing.
* Implement energy-efficient practices in construction processes, including:
* Selection of site levels to minimise cut-and-fill
* Slab design to minimise number of trucks/pours
* Engineering design to optimise size of concrete and steel structures
* Implement efficient design and materials to minimise waste particularly on the structure.
* Optimize machinery use to reduce idling and fuel waste.
* Use electric tools where possible and battery tools: Especially for smaller tasks.
* Use of cranes and lifts efficiently: Plan lifts to minimise idle time and fuel use.
* Switch to electric EWPs where possible once concrete slab is poured.
* Regularly maintain equipment to ensure optimal fuel efficiency.
* Bulk ordering: Minimizes packaging and delivery trips.
* Buy local: Reduces transport emissions and supports local economies.

The recommendations of the additional assessment by BPPAS are summarised as follows:
The development is to incorporate fire safety construction provisions as per NCC.
* All components of the development to be non-combustible (BAL-12.5).
* Education building to be constructed to BAL-19.
* An APZ maintained to the block boundary (excluding riparian/grassland constraint).
* A 10m defendable space to be maintained around the development.
* A 2m high colourbond fence to be constructed along the southern boundary, where unmanaged vegetation is within 20m of the building.
* Future grassland management to keep grasses below 200mm.
* Landscaped or vegetated areas to be maintained as ‘low threat’ as per BMS.
* Any tree planting not to result in overhang or obstruct internal driveways.
* No storage of hazardous materials within 10m of building.
* Electrical supply connections to be underground. Any exposed water pipes to be metal.
* Water supply tanks to incorporate 65mm outlet.
* Emergency management and fire evacuation procedures to be prepared and submitted to ACT Fire & Rescue before occupation.
* Fixed firefighting hose and reels to be of a length to reach all immediate surrounding areas.
* Signs to be installed to identify emergency vehicle access, locations of hydrant connection points and evacuation procedures.
Refer to Section 19.5, page 264-265 for details.

The APZ is considered as part of the additional BPPAS report outlined above.

The additional Bushfire Risk Assessment, included in full in Appendix Q confirmed that even with conservatively assessing the development as a ‘sensitive use’ the implementation of recommended measures and emergency management procedures would provide a far better outcome for bushfire safety compliance

Figure 11.1 has been added to the EIS to show the 1% flood depth and extent in the area. The design floor level of RL 616.25 is well above the 1 in 100 AEP flood level, with diversion infrastructure conveying floodwater around the pad.

Redacted version of the EIS and Appendix R provided
Redacted version of the EIS and Appendix R provided

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Appendix 5 – Public representations

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Representation for EIS or Territory Plan Variation Notification - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time	Reference code
13 Oct 2023 3:31:01 PM	YBF284N5

Thank you for your representation regarding application number: EIS202200011. A copy of your representation will be forwarded to the proponent of this proposal. The proponent must consider your representation when preparing a revised application for the planning and land authority's assessment.

Access Canberra
GPO Box 158
Canberra City ACT 2601
Phone: (02) 6207 1923
epdcustomerservices@act.gov.au

Type of representation

Application type

Please select the application type: *

EIS

Representor details

Title	Given name *	Family name *
Ms	Elle	Lawless

Organisation name

Conservation Council ACT Region

Enter at least one phone number: *

Home phone number	Work phone number	Mobile number
	0262293202	

Email address *

director@conservationcouncil.org.au

Application details

EIS /EIS exemption application number *

EIS202200011

Provide the details of your representation *

Submission Attached

You may upload any additional supporting documentation or photos.

SUBMISSION_MRF-EIS-Oct2023.pdf

Disclaimer

Please Note: Under section 220 (2) of the *Planning and Development Act 2007*; The planning and land authority must— (a) make a copy of the representation available on the authority website (b) give a copy of the representation to the proponent of the development proposal as soon as practicable after the public consultation period for the draft EIS ends.

In complying with the obligation under section 220(2), the authority discloses the representations, which may include personal information on its website and to the proponent. You may request to have part or all of your representation excluded from the public register under Sections 411 or 412 of the *Planning and Development Act 2007*. The request for exclusion must be in writing and clearly identify what you are seeking to exclude and how the request satisfies the exclusion criteria.

The Authority may approve or refuse to approve an exclusion application. If your request for exclusion is approved the Authority will seek to protect the information from disclosure. However, the Authority cannot guarantee that the information will not have to be disclosed pursuant to a legal obligation. The Environment, Planning and Sustainable Development Directorate's (EPSDD) Information Privacy Policy (https://www.planning.act.gov.au/about-us/privacy) contains information about how you may access or seek to correct your personal information held by EPSDD, and how you may complain about an alleged breach of the Territory Privacy Principles. Read our Information Privacy Policy. (https://www.planning.act.gov.au/about-us/privacy) If you require any further information on this Draft EIS please contact the Impact Assessment Team at EPDImpact@act.gov.au (mailto:EPDImpact@act.gov.au).

☑ Click here for more information on applying for exemption from the public register.

Exemption from the public register

To approve your request to exempt all or part of your representation from the public register the planning and land authority must be satisfied that the part of the representation to which your exclusion application relates contains information that:

(a) the publication of which would disclose a trade secret; or

(b) the publication of which would, or could reasonably be expected to

(i) endanger the life or physical safety of any person; or

(ii) lead to damage to, or theft of, property.

Please note: Completing this section does not guarantee your application for exemption from the public register will be approved. A customer service officer will contact you to discuss any request for exemption from the public register.

Do you want to apply to have all or part of your representation excluded from the public register? *

○ Yes ◉ No

Provide details of your exemption request *

N/A

CONSERVATION COUNCIL ACT REGION

Submission to ACT Chief Planning Executive

Materials Recovery Facility, Hume: Draft environmental impact statement

October 2023

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

Elle Lawless, Executive Director, director@conservationcouncil.org.au.

Introduction

The Conservation Council ACT Region welcomes the opportunity to provide comment on the draft environmental impact statement (Draft EIS) for the ACT Government's proposed new Materials Recovery Facility (MRF)[1].

The Council supports the rebuilding of an advanced materials recovery facility on the existing site in Hume. Re-establishing recycling processing in the ACT is critical to recovering the confidence of Canberrans to put their valuable waste materials into the appropriate bins. Diverting waste from landfill is essential to reducing greenhouse gas emissions, and the ACT Government is aware of the imperative to rapidly cut emissions from all sources as damaging climate change accelerates.

The Council supports the ambition for the new facility to be "one of the first advanced facilities in Australia" so as to recover and resell high-quality products at their highest-possible value usage, consistent with circular economy principles and ensuring the financial sustainability of the new MRF.

The Government must, however, not allow the building of this facility to divert efforts from the top of the waste management hierarchy: avoidance. The scale should be designed to be modular, to accommodate current waste levels but be responsive to efforts to reduce consumption and divert usable/repairable goods and materials, rather than require "feeding the beast" to maintain financial viability.

The Council provides the following comments on selected aspects of the MRF Draft EIS.

High-value materials recovery

The Conservation Council recommends building the MRF to world best practice standard.

The greater the sorting capacity and technological capabilities of the facility, the higher quality the recovered materials will be, ensuring that these materials have a high market value which will help fund the facility.

The Council supports the inclusion of glass processing and washing. However, the Council urges the Government to aim for recovery and processing of glass from and for higher-value uses in a broader range of glass products (including windows, solar panels, electronic device screens, medical products, household glassware and fibre optic cables). More sources of glass should be sorted by colour and feed back into glass production rather than the increasingly common approach of downgrading recovered glass into trench filler and roadbase. Glass can be endlessly repurposed as glass[2], with significant material and energy savings compared to mining and processing virgin sand, consistent with circular economy principles. Only residual glass that would otherwise end up in landfill should then feed into construction materials[3].

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[1] GHD, 2023, Hume Material Recovery Facility: Draft environmental impact statement, ACT NoWaste, https://www.planning.act.gov.au/__data/assets/pdf_file/0007/2273029/MRF-Draft-EIS-202200011.pdf

[2] Dalla Costa, S, & De Meillon, M, 2022, 'Improving Australia's glass recycling', CSIRO, https://www.csiro.au/en/news/All/Articles/2022/August/glass-recycling
Glass Packaging Institute, n.d., Glass container recycling loop, https://www.gpi.org/glass-recycling-facts

[3] University of Melbourne, 2020, 'Breaking glass and breaking traditions: innovation in the construction industry', Faculty of Engineering and Information Technology, https://eng.unimelb.edu.au/industry/infrastructure/news-and-events/breaking-glass-and-breaking-traditions-innovation-in-the-construction-industry

Plastics should likewise be sorted by polymer, quality and colour to feed back into circular production to reduce demand for virgin plastics. The ACT Government should investigate expanding the plastics processing capability to include soft plastics following the collapse of RedCycle.

The Government should take the opportunity to collect and process a wider range of post-consumer products, partnering with local enterprises to invest in adjoining processing facilities for complex materials and feeding these back into the local market to support a circular economy. Technical nutrients such as plastics, metals, glass, concrete, textiles and minerals should be returned to technical cycles to reduce extraction of virgin resources. Invest in research collaborations, such as SMaRT@UNSW and the CSIRO, to develop solutions for complex wastes such as disposable coffee capsules, rubber tyres, electronics, medical wastes and mattresses.

For further discussion, see the Conservation Council's submissions on the Tarago Veolia Woodlawn Waste to Energy facility[4] and the Draft ACT Circular Economy Strategy[5].

The new facility should also include collection and processing of soft plastics, given the complete failure of REDcycle and the national industry to address this massive problem.

Environmental impacts

The Council appreciates the measures designed to minimise and manage environmental risks during both construction and operation.

The Council supports the approach of avoidance, salvage and onsite reuse of construction materials during demolition and redevelopment of the site.

Water flow, containment and treatment across the site must be managed to avoid washing of toxins and particulates into local waterways, including during extreme weather flood events. The Council recommends regular testing of runoff from the site to prevent toxins reaching local waterways.

The Council notes that the facility will be enclosed, which should minimise potential for materials to escape the boundaries and become environmental pollutants (such as wind-blown plastics). The operators should ensure that perimeters of buildings and the outdoor bale storage area are kept clean and tidy, and that doors and windows are effective at containing loose materials.

The Government should ensure state-of-the-art fire suppression systems are installed in both facilities to avoid a repeat of last year's fire. This needs to include temperature control measures to prevent combustion of materials and equipment in extreme hot weather and bushfire events.

Weber, K, 2020, 'Paving the roads with glass', The Fifth Estate, https://thefifthestate.com.au/innovation/materials/paving-the-roads-with-glass/

[4] Conservation Council ACT Region, 2022, Submission to NSW Government Major Projects: Woodlawn Advanced Energy Recovery Centre, https://conservationcouncil.org.au/wp-content/uploads/SUBMISSION_VeoliaWoodlawnIncinerator-CCACTR-Dec2022.pdf

[5] Conservation Council ACT Region, 2022, Submission to ACT Government: Draft ACT Circular Economy Strategy, https://conservationcouncil.org.au/wp-content/uploads/SUBMISSION_CircularEconomyStrategy_Dec2022-CCACTR.pdf

The ACT Government should implement a schedule of regular inspections and maintenance to ensure ongoing compliance and effectiveness of environmental risk management strategies.

Air quality

It is critical that the new facility manage odour, dust and airborne particulates, including during extreme weather high-wind events, so as to ensure good air quality and social acceptance of the facilities.

There are only three air quality monitoring stations in the ACT, and potential air pollution is a cause of concern for many residents of Canberra and surrounding suburbs. The building of this new facility provides the Government with an excellent opportunity to install a new air quality monitoring station in an industrial area. This would provide valuable data, contributing to preventative health measures for vulnerable residents. It would enable operators of the MRF to monitor and respond rapidly to any sources of pollution within the facility and provide assurance to the public.

Biodiversity and nature conservation

The Council notes that the Government intends to clear up to one hectare of grassland habitat in which no threatened species have been recorded.

The Government should plant native vegetation including grasses, ground covers and shrubs around the site. This would provide multiple benefits including visual screening, biodiverse habitat, soil moisture retention, wind-breaking and cooling microclimate. This should include restoration of indigenous grasses to offset the cleared grassland habitat.

Greenhouse gases

The Council notes that total greenhouse gas emissions during construction of the facility are estimated at 5,150 t CO2-e, and at full scale, operational emissions are estimated to be on average 24,960 t CO2-e per year.

Given that the majority of operational emissions are expected to be due to “feedstock contamination sent to landfill”, it is clearly imperative to minimise contamination of collected materials, and maximise diversion from landfill. Education is critical to minimising contamination in the first instance (more below). Expanding the sorting, washing and recovery capabilities of the facility will help to minimise contaminated loads sent to landfill (more in ‘circular economy’ below).

The remainder of the operational emissions will presumably be from operating facility machinery. The Government should seek to replace all fossil-fuel driven machinery with electric machinery, or, at the least, investigate low-emissions fuel alternatives such as methane gas captured from landfill or biodiesel from local agricultural sources.

Transport

Again, to minimise greenhouse gas emissions associated with the MRF, the Government should replace the fossil-fuel collection truck fleet with electric vehicles.

The Government should also ensure that collection trucks are restricted in size so as to safely navigate all Canberra streets without compromising mature trees and planning for active travel infrastructure.

Heritage

The Council urges the Government to take all appropriate measures to avoid disturbance to identified Aboriginal heritage sites and artefacts within the development site.

Community education

The Council fully supports the inclusion of an educational facility within the MRF site.

The new facility must be supported by significant investment in community education to minimise contamination of both comingled recycling and FOGO collected from households. Money spent on education is well spent. As the Government well knows, lack of education leads to high contamination rates which leads to poor quality products which cannot be sold, leading in turn to failure of economic viability of the facilities, plus greenhouse gas emissions from resulting landfill. An example is the highly contaminated organic waste exported from Sydney to Veolia's Woodlawn facility, leading to unsaleable product that ends up dumped in landfill, completely defeating the purpose of collecting it from households, and undermining public confidence in recycling services.

Community education could be delivered in partnership with enterprises such as Capital Scraps, the Canberra Environment Centre and SEE-Change (with adequate funding). This education should commence well ahead of completion of the facility and the start of scaled-up collections.

Circular economy

The ACT Government should invest further in developing a circular economy for Canberra. See the Conservation Council's submission on the Draft ACT Circular Economy Strategy.

Community and business education must drive a shift in thinking from "waste management" to "circular economy". This requires us to reconceptualise "wastes" as "valuable byproducts", ie that outputs from one process become inputs to another process either onsite or at a completely different operation. For instance, many organic byproducts could have higher-value uses than being composted, if they can be managed to an appropriate quality. Construction materials salvaged from demolition sites should be reused as construction materials wherever possible.

Government could support this transfer of materials through:

- Mapping these processes, inputs and outputs across the ACT via an online platform that enables organisations to connect.
- Removing regulatory barriers to higher value uses (e.g. Goterra's insects could become protein for human consumption).

Government efforts should include advocating at the national level for compulsory stewardship schemes across all product categories, and mandatory recycled content targets. These are essential for driving producer responsibility, funding to invest in recovery and processing, and markets for recovered materials, all of which are essential to the financial sustainability of this MRF.

Government should also continue with efforts to categorise materials and goods that cannot be recycled by the MRF and invest in developing solutions, including recycling technologies where feasible and policy solutions to avoid producing such goods and materials.

The ACT Government should expand partnerships with local enterprises (such as The Green Shed and Lids4Kids) and local research institutions (such as the CSIRO) to expand the sorting and recovery capabilities of the new MRF. Enabling more forensic manual and technologically advanced sorting would reduce contamination of materials at the facility and greater recovery of usable materials. Partnerships with industrial research institutions should be directed at developing recycling solutions for those materials the MRF will not yet be capable of.

The Government should also proceed with plans to build a FOGO facility and collection service, and a hygiene products strategy, both of which should reduce contamination of co-mingled recycling and waste-to-landfill.

Summary and recommendations

The Conservation Council supports the building of the proposed MRF at Hume with the following recommendations:

- Install an air quality monitoring station
- Implement environmental containment measures proposed
- Implement a schedule of regular environmental monitoring (including water runoff), maintenance and compliance
- Plant native vegetation around the facility for multiple benefits
- Replace the fossil-fuel collection truck fleet with electric vehicles, at a size suitable for slow-traffic streets safe for active travel
- Protect Aboriginal heritage values
- Partner with and adequately fund local enterprises and research institutions to expand the sorting and recovery capacity to maximise reuse, high-quality materials recovery and diversion from landfill
- Aim for the highest-value uses of glass, plastics and all other recoverable materials, according to circular economy principles
- Partner with and adequately fund community organisations to enhance community education

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