



DEREK WHITE

OBJECT

Submission ID: 214488

Organisation: <i>WinZero Inc</i>	Key issues: <i>Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic, Other issues</i>
Location: <i>New South Wales 2575</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/15/2024 6:04:27 PM

Attached

WinZero Inc
P.O. Box 1193
Bowral NSW 2576

SUBMISSION TO INDEPENDENT PLANNING COMMISSION
re
PLASREFINE PLASTICS RECYCLING PROPOSAL
by
WINZERO INC

DEAR COMMISSIONERS

- WinZero is the go-to organisation on environmental matters in the Wingecarribee Shire with a mission to protect and enhance what green-between there is left in the Highlands
- The organisation has 80+ members and 800+ social media followers and, in this particular matter, this submission espouses the views of the overwhelming majority of them
- It has to be said at the outset that there is absolutely no objection to plastics recycling in principle. It is essential in order to deal with the mountain of such material cast off by our wasteful society unless and until the usage of plastic is drastically reduced across the board
- It is strongly maintained that, without a shadow of a doubt, this is absolutely the wrong place to put such a facility, and this submission will try to explain why it is considered that **this is not the right site**
- The focus will be on three areas in this submission – the paucity of operational details provided by the Proponent and its EIS consultant (GHD), the incompatibility with the objectives of strategic plan for the Southern Highlands Innovation Park (otherwise known as the SHIP), and the very doubtful economics of the project.

1. Lack of Design Detail

- Key concerns in this area are:
 - The Proponent should never have been allowed to get away with such a general **process description** as that presented here – no detailed equipment description and/or specification, no analysis of the likely feed materials, chemical additives or in-plant material flows, no detailing of the likely flue gas and particulate streams and resultant emissions or dust management etc, etc.

- They should have been required to engage a process engineering firm at the outset to do a plant design that would allow equipment sizing and specification of its performance to enable assessment of infrastructure needs, especially the likely power draws, process water requirements, as well as gas stream and waste and effluent stream quantities and qualities
- They should then have been required to do an in-depth **risk assessment** of the project, and present robust prevention or mitigation strategies for at least the higher probability/higher seriousness ones. We have seen little sign of any such assessment in the Proponent's documentation
- The DPHI would argue that they have covered off on the risks by including "mitigation measures" in their assessment report. The problems with these are:
 - There are over 60 identified issues/impacts in their report and nearly 100 "mitigation measures" stipulated
 - These measures are a combination of management plans, engineering requirements, procedures, strategies, vehicle movement plans, data gathering and modelling, systems, surveys, education, detailed designs, vegetation screenings, reporting, partnerships and consultations to be carried out before and during construction and operation of the plant
 - There are likely to be more of these measures imposed by the IPC if it is ever approved
 - The number and scope of the proposed mitigation measures required surely confirm the contention that this project is completely incompatible with its proposed location
 - They are being imposed on a Proponent with absolutely no track record in an industry that is already noted for its regular circumvention of rules and regulations
 - There is no spelling out of who and how compliance with the measures will be effectively monitored and controlled. The Wingecarribee Shire Council does not have the expertise or staff to do it, and the local community cannot be expected to do so
 - As a result, it will fall on the relevant government bodies to do this - and they are also short-staffed and at least 1.5 hours away from the site (even in the unlikely event that the right people are available at short notice)

In summary, there are far too many examples in the DPHI assessment report of “she’ll be right on the night, mate” on the apparent assumption that the Proponent will be able to work all this out in a timely and effective manner starting from ground zero and then stick with them

As a result, the overall assessment and approval process for Plasrefine leaves a lot to be desired. In fact, it is hard to imagine how any project that has so many red flags attached to it could get recommended for approval by the Department of Planning.

2. Site Incompatibility with Local Strategic Planning Objectives

- The second big overall problem with the project is the complete incompatibility of a plant like that proposed here with the stated objectives of the Wingecarribee Shire Council's overarching Master Plan for the SHIP and the Wingecarribee Local Environmental Plan (LEP)
- WinZero has worked closely with the Council's Strategic Planning team to develop the best possible outcome in the SHIP – both for the Shire as a whole, as well as nearby residents and other SHIP occupants. The focus has been on low-impact, innovative and regenerative industries, educational and research establishments, and other light industrial operations like the current data centre and bioresearch facilities
- The Master Plan for the SHIP certainly doesn't envisage a potentially hazardous and polluting operation like Plasrefine. How and why can the state government ignore the desires of the Council and the local community by recommending such a project – particularly as the State has provided significant funding to the council to facilitate the drafting of the aforesaid Master Plan?
- It is noted that the Proponent leans very heavily on the "Advanced Manufacturing" cloak of respectability in GHD's recent statements. They say it "Involves advanced manufacturing through the use of robotics for optical sorting, a research and development laboratory to advance recycling technology and an educational facility for improving knowledge about sustainability and circular economy".

Not only is this a late addition to the Proponent's project description, but it is a gross exaggeration into the bargain. "Robotics" in this instance means using a camera, a bit of AI and air jets to separate different materials and, as such, is already widely adopted in this industry (and many others) for sorting. Nothing "advanced" about it. The rest of the quoted statement is GHD's version of greenwashing, and appears to be very much like clutching at straws to make the project fit the SHIP objectives.

3. Project Economics

It is not possible to be definitive on the economics due to the lack of information available from the Proponent, but there are serious doubts that it can ever be an economic business for a number of reasons:

- Given the plant design is so sketchy and recent construction cost escalation so high, it is estimated that the base cost will be significantly higher in the end than their original guesstimate of \$88 million
- The fact that the 200,000-tonne plastics recycling plant proposed by Brightmark at Parkes is estimated to cost well in excess of \$300 million supports this contention
- All of the constraints that are likely to be placed on the operation by the outstanding infrastructure needs and the likely conditions of any approval will undoubtedly escalate both capital and operating costs
- Industry investigations suggest that the supply chains in Australia for pre-processed plastics are well developed and often locked in by long term contracts. Therefore, the Proponent will have difficulty obtaining a large quantity of good quality feed materials on an ongoing basis, and will no doubt have to resort to materials that are unwanted by the other specialist plastics recyclers
- Independent reports by the industry indicate that the margins on recycling plastics are slim, even with the best quality feed materials
- The market in Australia for the likely products is very limited, so a significant portion will have to be shipped overseas, if not dumped.

Because of the seemingly indecent haste to get this project approved, there is no time to get an expert analysis done of the business case. However, in WinZero's opinion, even if large government subsidies are made available, this project is highly likely to fail in the not-to-distant future and thus be an enduring blot on the SHIP landscape.

- **In conclusion, the Commissioners are urge not to support the DPHI's recommendation that this project proceed for three main reasons:**
 - **The inadequacy of the application and assessment process,**
 - **Its complete incompatibility with the objectives of the Wingecarribee LEP and the Wingecarribee Council's Master Plan for the SHIP, and**
 - **The likelihood of its early closure due to poor economics**

PLEASE DON'T SINK THE SHIP!!



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Derek White
for & on behalf of WinZero Inc
15 November 2024